



**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals****Sub-Committee of Experts on the Transport of Dangerous Goods****Forty-sixth session**

Geneva, 1 – 9 December 2014

Item 2 (b) of the provisional agenda

**Recommendations made by the Sub-Committee on its forty-third,
forty-fourth and forty-fifth sessions and pending issues: listing, classification and packing****Table tennis balls transported as UN 2000****Submitted by the Dangerous Goods Advisory Council (DGAC)¹****Introduction**

1. The Sub-Committee will recall at the previous session, DGAC raised a question regarding the applicability of the Model Regulations to table tennis balls manufactured from celluloid (see ST/SG/AC.10/C.3/2014/33 and ST/SG/AC.10/C.3/90, paras 55-56).
2. The majority view appeared to be that these articles are not inherently exempt from the provisions of the Model Regulations as DGAC believed, and although there was some discussion regarding whether they should be assigned to UN 1325 or UN 2000, a majority of the Sub-Committee appeared to favor classification as UN 2000. It was mentioned that the danger associated with these articles occurs when they are transported in large quantities and a suggestion was made that perhaps a special provision could be developed for use against UN 2000 that would create an exemption based on the packaging and quantity of table tennis balls. DGAC agreed to take the comments on board and return at the forty-sixth session with a revised proposal.
3. Celluloid table tennis balls do not meet the defined criteria for Division 4.1 in the Model Regulations which states, “Readily combustible solids are powdered, granular, or pasty substances which are dangerous if they can be easily ignited by brief contact with an ignition source, such as a burning match, and if the flame spreads rapidly.” (See

¹ In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

2.4.2.2.1.2). Table tennis balls are not subject to the classification test for Division 4.1 in the Manual of Tests and Criteria which states, “The tests should only be applied to granular, paste-like or powdery substances.” (See 33.2.1.3.2) Thus, classification as Division 4.1 is not possible other than by analogy with existing entries (per 33.2.1.2.1 of the Manual of Tests and Criteria), or through a specific entry being placed in the Dangerous Goods List. Special provision 223 is assigned to UN 2000, and states,

“If the chemical or physical properties of a substance covered by this description are such that when tested it does not meet the established defining criteria for the class or division listed in Column 3 of the Dangerous Goods List of Chapter 3.2, or any other class or division, it is not subject to these Regulations.”.

4. Celluloid table tennis balls are generally 40 mm in diameter or less and each ball weighs 2.7 grams or less. UN 2000 may be transported as a limited quantity with a maximum quantity per inner packaging or article of 5 kg. UN 2000 may be transported as an excepted quantity with a maximum net quantity per inner packaging of 30 grams and a maximum net quantity per outer packaging of 1 kg (1000 grams).

5. Celluloid table tennis balls are often shipped in fibreboard sleeves, plastics bags, or blister packs in quantities of three, six or twelve balls per package, they may be packed loose in a fibreboard box in a quantity of one gross (144 balls), or they may be shipped in an article, such as an air flow meter, containing a single celluloid table tennis ball. DGAC understands that in large numbers, celluloid table tennis balls may present a hazard of Division 4.1. However, DGAC believes that when transported in very small numbers, celluloid table tennis balls present no hazard worthy of being declared a dangerous good, and that even the lesser requirements for transporting dangerous goods in excepted quantities represent an unnecessary and overly cautious application of the dangerous goods regulations and in such situations, those requirements should not be applied.

6. Figures 1 - 9 below show the types of packages and articles of concern.



Figure 1



Figure 2



Figure 3



Figure 6



Figure 9

Figure 4



Figure 7

Figure 5



Figure 8

Proposal

7. Create a new special provision XXX for use with UN 2000 which reads as follows:
 “Articles manufactured from celluloid, such as table tennis balls, are not subject to these Regulations when 144 or fewer celluloid articles are contained in a package or other article and when the total net mass of the celluloid articles does not exceed 0.5 kg.”
