



**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-fifth session**

Geneva, 23 June- 2 July 2014

Item 4 (c) of the provisional agenda

Listing, classification and packing: miscellaneous**Clarification of requirements applicable to UN 2000, celluloid****Transmitted by the Dangerous Goods Advisory Council (DGAC)¹****Introduction**

1. At a previous session, the Sub-Committee agreed to include a provision in 2.2.2.4 to indicate that sports balls are not subject to the Model Regulations. 2.2.2.4 states: "Gases of Division 2.2 are not subject to these Regulations when contained in the following: Balls intended for use in sports". Nevertheless, it has come to DGAC's attention that some manufacturers of tennis table (ping pong) balls that are manufactured from celluloid are transporting them as regulated goods under the entry UN 2000, Celluloid. Some airline personnel and competent authorities have suggested that celluloid tennis table balls are subject to the transport regulations and questioned whether the exception in 2.2.2.4 applies. DGAC has uncovered Safety Data Sheet documents related to celluloid tennis table balls. While some may think that it should be obvious that celluloid table tennis balls are not subject to the Model Regulations there appears to be a need for clarification.

2. Celluloids are a class of compounds created from nitrocellulose and camphor, with added dyes and other agents. They were generally considered the first thermoplastics and are easily molded and shaped. While the entry "UN 2000, CELLULOID in block, rods, rolls, sheets, tubes, etc., except scrap" specifically mentions in block, rods, rolls, sheets, tubes, etc. except scrap there seems to be confusion that is leading to some individuals believing that the entry applies to manufactured articles such as jewelry, guitar picks, billiard balls, dolls, picture frames, charms, hat pins, buttons, buckles, stringed instrument

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).

parts, accordions, fountain pens, cutlery handles, kitchen items and table tennis balls. DGAC suggests that there may be a need to further clarify that the entry should not be used for manufactured articles. It is DGAC's understanding that the intent of UN 2000 was to regulate quantities of celluloid raw materials used in manufacturing or materials shipped for recycling or disposal and not consumer articles such as table tennis (ping pong) balls which are typically 40 mm in diameter and weigh approximately 2.7 grams. DGAC does not believe that such articles pose a risk to health, safety, the environment or property during transportation.

Proposal

3. DGAC requests that the Sub-Committee clarify that celluloid tennis table balls are not subject to the Model Regulations. DGAC requests that the Sub-Committee:

- (a) Include a clear statement in the report of the 45th session indicating that celluloid tennis table balls are not subject to the Model Regulations; and
- (b) Include a new SP XXX against UN 2000 as follows:

“XXX This entry does not apply to manufactured articles [such as table tennis balls*].”

* The Sub-Committee is invited to consider whether examples are necessary.
