8.0
Tracking very hazardous substances

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Some very hazardous substances must be tracked, recording what happens to them from when they were imported into New Zealand or manufactured, through their distribution and transport, to their final use or disposal.

Tracked substances can only be transferred to competent persons. The Calculator will let you know if your substances have tracking requirements.

Some examples of tracked substances are embalming substances or cyanide in the metal working industry.

Tracking highly hazardous substances makes sure that:
- these substances are under the control of an appropriately trained person (tracked substances must be under the control of a competent person, if not, they must be appropriately secured)
- if the substances are held in transit, the place meets the requirements for a transit depot, and
- tracked substances are stored at a site that has a location compliance certificate (if one is necessary).

8.1 Where does tracking start?

If the substance is manufactured in New Zealand, tracking starts at the premises where it was manufactured.

If the substance is imported into the country, tracking starts at the port where the substance enters New Zealand.

8.2 The competent person’s responsibilities

Any hazardous substance requiring tracking must be under the responsibility of a competent person or appropriately secured throughout its lifecycle.

A competent person is either a certified handler, or a person who has received the information, instruction and training required to work with the substance.

If a tracked substance substance is transferred:
- the conditions and circumstances of its transfer must be recorded, and
- a competent person must be identified at the destination.

A tracked substance must be either:
- under the personal control of a competent person, or
- appropriately secured at all times.

8.3 Keeping tracking records

If you are the PCBU of a site where tracked substances are used and stored, you are responsible for keeping tracking records.

Tracking records must be readily accessible to workers or competent persons who handle the substance and readily understandable to a competent person required to have access to the substance. This means that these people know where to find the record, and that it uses commonly understood terminology.

An inspector must be able to find the substance location on the tracking record in two minutes, and find the substance or its container at the place stated on the record in one hour or the time specified on the emergency response plan, whichever is shorter.

The records must be kept for 12 months after the substance has been transferred to someone else.

If the substance is discharged into the environment or otherwise used or disposed of, the record must be kept for three years.
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8.4 Information needed in tracking records

The tracking record must contain:

- the name, position and contact details of the competent person in control of the substance, including the physical address of the place of work
- if applicable, the hazard classifications of each phase of the lifecycle of the substance for which the person has a certified handler certificate and the expiry date of the certified handler certificate
- the product or chemical name and amount of the tracked substance under the control of the competent person at any one time
- the exact location of the substance allowing an inspector to locate the substance within the times mentioned above
- details of any transfers of the substance to another location such as the product or chemical name of the transferred substance, the identity and address of the PCBU receiving it and the date of transfer
- information about the disposal (including use) of the tracked substance, including how, when and where it was disposed of and the quantity disposed of
- the unique identifiers of containers for vertebrate toxic agents (VTAs) containing certain active ingredients.

Further information

See WorkSafe’s website for more detailed guidance on tracking.