



Tracking very hazardous substances: what you have to do and how to do it

There are some substances that are so highly hazardous that their whereabouts needs to be known at all times. This means a record of them must be kept, from the time of manufacture or importation, to their final use and/or disposal. As a retailer you have a key role in this.

Agrichemicals that must be tracked include

- highly toxic (class 6.1A or 6.1B) substances (for example, Agpro Metamitron, Aquathol, and Goltix)
- substances with a high capacity to oxidise (class 5.1.1A) (for example, hydrogen peroxide >60% aqueous solution, and potassium periodate), and
- some VTAs and fumigants, which may not carry a class 6.1A or B classification, but are still considered toxic enough to warrant tracking controls.

You need to know where they are, where they are going, and who is looking after them

At every point, a tracked substance needs to be under the control of a competent person who will take responsibility for it from the time it is received to the time it is used, transferred, or disposed of.

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

You must have a written record

The retailer is responsible for keeping records of all tracked substances in stock and every transfer or use of a tracked substance.

An inventory is not a substitute for having a tracking record. A tracking record requires more detailed information.

The tracking record must include

- the name and amount of the tracked product
- where exactly it is being held

- the name, job title, and physical address of the workplace for the competent person in control of the substance, and (if applicable) details of their certified handler certificate (that is, the hazard classifications they are competent to handle)
- details of every sale and transfer, including the identity and address of the purchasing PCBU and the date of sale
- details of any disposal of the product and its container (for example, if it was damaged or there was a spill) - how much, how, when, and where.

The records should be easily understood and accessible

- They must be readily understandable by any competent person required to have access to the substance.
- They must be readily accessible to any worker who is handling the substance.
- They must be kept for at least 12 months if the substance has been transferred, or three years if the substance has been changed so that it is no longer a tracked substance, or disposed of.

The records must be easily available for inspectors

- An inspector must be able to identify the exact location of the substance within two minutes of having obtained the record.
- An inspector must be able to physically find the tracked substance within one hour of arriving on site.



Further information

Substances that must be tracked

Schedule 26 of the Health and Safety at Work (Hazardous Substances) Regulations 2017 (Tables 1 and 2 only)

There are certain chemicals (such as 6.1C substances) that can only be sold to workplaces and therefore also require a competent person and tracking

Sell or supply certain chemicals to workplaces only EPA, 2018