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Inventory requirements for hazardous substances

KEY FACTS

You must prepare and keep an inventory of every hazardous substance that you use, handle, manufacture or store at your workplace, including hazardous waste.

This guide describes how to prepare an inventory, the information it needs to include and who needs to have access to it.

What does the law require?

Under the Health and Safety at Work (Hazardous Substances) Regulations 2017, as a PCBU¹ with management or control of a workplace where hazardous substances are present, you must:

- prepare and keep a list, called an inventory, of all the hazardous substances used, handled, manufactured or stored at your workplace, including hazardous waste
- keep the inventory up-to-date
- make sure the inventory is available to emergency services attending the workplace.

For more details about what you need to include in your inventory, see *Inventory Content* further below.

Why do you need an inventory?

An inventory will help you:

- quickly access information about your hazardous substances
- work out what controls (eg measures to manage risks, such as signage and secondary containment) you need to put in place
- plan your emergency procedures
- tell emergency workers, compliance certifiers or health and safety inspectors what hazardous substances you have.

¹ Person Conducting a Business or Undertaking. In simple terms, a PCBU is an individual or company carrying on a business, but it can also be other types of organization. For more information about what a PCBU is, see the special guide *Introduction to the Health and Safety at Work Act 2015* and related fact sheets available on the WorkSafe website.

Inventory content

What must be in the inventory

For each hazardous substance used, handled, manufactured or stored at your workplace, your inventory **must** include:

- the product or chemical name and United Nations (UN) number (if available)
 - This information will be in *Section 14: Transport Information* on your safety data sheet (SDS).
- the maximum amount likely to be at the workplace
- its location
- any specific storage and segregation requirements. See the following sections of your SDS for this information:
 - *Section 7: Handling and Storage*
 - *Section 10: Stability and Reactivity*. This section also has information on any incompatible materials or substances.
- an SDS (see below) or a condensed version of the key information from the SDS.

Safety data sheets

A current SDS (or a condensed version of its key information, for example a product safety card) must be available for all hazardous substances at your workplace, except hazardous waste. An SDS contains important information about:

- substance identification
- first aid
- storage
- cleaning up spills
- suitable personal protective equipment.

You must obtain (and the supplier must provide) a compliant and up-to-date SDS for products when they are first supplied to your workplace, including if it has been five years since you last received the substance, or when a product is supplied for the first time after a significant change to its SDS.

Hazardous waste

The inventory must also include hazardous waste. This means waste likely to meet the classification criteria for substances with explosive, flammable, oxidising, toxic or corrosive properties in the Hazardous Substances (Classification) Notice 2017.

For hazardous waste, your inventory must include:

- an identifier describing the waste as closely as possible (ie chlorinated solvent waste)
- the maximum quantity of the waste likely to be at the workplace
- its location
- any specific storage and segregation requirements for the waste.

Hazardous waste does not require an SDS.

Other useful information

You should also include other information in your inventory that is useful for finding which controls you need to implement. Depending on the substance, you may also need this information to enter a substance into the *Hazardous Substances Calculator* (the Calculator).²

² The Calculator can be found on the Hazardous Substances Toolbox at: www.hazardoussubstances.govt.nz

Instead of the name of the substance, you can enter its approval number and/or group standard name into the Calculator. To find this information, see *Section 15: Regulatory Information* on the SDS, or visit the Environmental Protection Authority's *Approved Hazardous Substances with Controls Database*, available at: www.epa.govt.nz

Other additional items included on the inventory template at the end of this guide are:

- the hazard classification
 - To find this information on your SDS, see *Section 2: Hazards Identification*.
- the UN class and packing group
- the substance state (gas, liquid or solid)
- information about flammable liquids:
 - container size
 - whether the container is open or closed.

Container size and type can affect the controls you must comply with. For example, you will need a location compliance certificate for flammable liquids if you store:

- 50 L or more in an open container
- 100 L or more in closed containers larger than 5 L
- 250 L or more in closed containers up to 5 L.

Preparing your inventory

First steps

You will need your *Workbook* to gather information about your substances that you will input into the Calculator. The *Workbook* is available at: www.hazardoussubstances.govt.nz

Take a look around your workplace and record all of the hazardous substances in it.

Read the SDS for each hazardous substance you identified. From the SDS, put the required information into the *Workbook*.

Complete any remaining fields in the *Workbook*.

Table 1 at the back of this guide is an example that may help you prepare your inventory.

Using the Calculator

You can also use the Calculator to prepare your inventory.

When you open a new inventory using the Calculator, it will give you a personal identification number (PIN) that will let you access and edit the inventory online.

Keep this PIN safe, or you will lose access to your inventory. WorkSafe will not be able to reset this PIN for you. You can use the Calculator to email the PIN to yourself.

Enter all of the information about your substances requested by the Calculator.

After you have entered your substances, they will be saved as an inventory, which the Calculator can print. The Calculator will also tell you the controls that apply to your substances.

How to keep and use your inventory

What kind of inventory should you have?

Your inventory can be a paper or an electronic document, such as a database or spreadsheet on a PC, tablet or phone. It can also be created, edited and accessed online using the Calculator. If you have an electronic inventory, make sure you have a backup (eg a printed copy, or a copy on a device like a memory stick).

This back up needs to be readily accessible to emergency service workers.

Where should you keep your inventory?

You must keep your inventory at your workplace and make it readily accessible to any emergency service worker attending the workplace during an emergency and after the workplace has been evacuated. Emergency service workers need to know what hazardous substances are at the workplace to decide how to deal with any emergencies.

Remember: It is useful to have hard copies of your inventory available on site for quick access in an emergency. You can also provide copies to your local branch of Fire and Emergency New Zealand.

Do your workers need to access the inventory?

While your workers do not need to have access to the inventory, they must be able to access SDS and understand the safety information they contain.

This could mean giving your workers the key safety information in another way (eg in product safety cards).

Check with your supplier if product safety cards are available for the hazardous substance.

See our *Guide to Safety Data Sheets in the Workplace* for more information.

Keeping your inventory up-to-date

You must maintain your inventory so that it is correct and up-to-date.

You need to update your inventory whenever there is a change to the information that is kept in it, such as the substances or maximum amounts likely to be at your workplace.

You will also need to update your inventory if the information on the SDS changes (eg the recommended segregation or storage requirements) or you move substances to a different location.

When you update your inventory, you should also review and, if needed, update your control measures. For example, you may have a new substance that needs to be stored inside secondary containment.

When don't you need to keep an inventory?

You don't need an inventory for hazardous substances that are also consumer products used at the workplace in amounts similar to those used at home, for example household cleaning products sold in supermarkets.

You don't need an inventory for hazardous substances in a transit depot or designated transfer zone. This is because goods in transit remain in their packaging and are subject to the Land Transport Rule: Dangerous Goods 2005.³

However, the PCBU with management or control of the transit depot or transfer zone must be able to provide a list of hazardous substances and the quantity of each substance to emergency service workers when requested.

A final example of when you do not need to keep an inventory of hazardous substances is if your workplace is a small scale laboratory where hazardous substances are used in research and development, teaching or analytical testing.

In this case, you only need to keep a record of:

- hazardous substances that need tracking
- any substances likely to be hazardous substances that are not approved.

³ www.nzta.govt.nz/resources/rules/dangerous-goods-2005-index

NAME OF PRODUCT AND/OR UN NUMBER	APPROVAL NUMBER AND GROUP STANDARD NAME (if applicable)	HAZARD CLASSIFICATION, UN CLASS AND PACKING GROUP	CURRENT SDS AVAILABLE?	SPECIFIC STORAGE AND SEGREGATION REQUIREMENTS*	CONTAINER SIZE	OPEN OR CLOSED CONTAINER?	GAS, LIQUID OR SOLID	LOCATION (eg Flammable Goods Cabinet, Storage Room 02)	MAXIMUM LIKELY AMOUNT
Required or useful	Useful for Calculator	Useful for Calculator	Required information	Required information	Useful for Calculator	Useful for Calculator	Useful for Calculator	Required information	Required information
Acetone	HSR001070	3.1B, 6.1E, 6.3B, 6.4A 3 II	Yes	Store away from sources of heat and ignition Keep away from bases, oxidising agents, reducing agents, reacts violently with phosphorous oxide	4 x 10 L 1 x 5 L	Closed	Liquid	Flammable goods cabinet	45 L
Polyurethane	HSR002662 - Surface coatings and colourants (Flammable) Group Standard 2006	3.1C, 6.1E, 6.3A, 6.4A, 6.5A, 6.5B, 6.8B, 6.9A, 9.1D 3 III	Yes	Incompatible with oxidising agents and flammable gases Store in approved flammable liquid storage area	10 L	Closed	Liquid	Flammable goods cabinet	10 L
Polyurethane thinner	HSR002650 - Solvents (Flammable) Group Standard 2006	3.1B, 6.1E, 6.3A, 6.4A, 6.8B, 6.9B, 9.1D, 9.3C 3 III	Yes	Store out of direct sunlight Incompatible with oxidising agents and flammable gases	10 L	Closed	Liquid	Flammable goods cabinet	6 L
LPG	HSR001009	2.1.1A 2.1 (no packing group)	Yes	Incompatible with oxidising agents, flammable liquids and acids Keep away from heat and ignition sources Hazardous area Location compliance certificate required	45 kg	Closed	Gas	Locked LPG cage	180 kg

TABLE 1: Example inventory

* These are only examples of the information you can include in this column. See section 7 and 10 of your substance's SDS for specific storage requirements and incompatible substances.