

10 Transportation of Dangerous Goods Training Pitfalls to Avoid



Part 6 of the Transportation of Dangerous Goods (TDG) Regulations require employers to ensure that workers who handle, offer for transport or transport dangerous goods are adequately trained for the duties they perform. Employers must issue each trainee a “[certificate of training](#)” documenting that TDG training was provided. But the certification paperwork is only the beginning rather than the end of the employer’s compliance responsibilities. Employers must ensure that trainees are not only aware of TDG concepts but also capable of performing their TDG responsibilities correctly and safely. Compliance with these requirements is one of the first things government inspectors check when responding to a spill or other TDG incident. Here are 10 common TDG training pitfalls that can get employers into trouble and how to avoid them. Go to the OHS Insider site for a [Game Plan for complying](#) with Transport Canada’s new competency-based TDG training requirements.

Pitfall 1. Treating TDG Training as a One-Time Paperwork Exercise

Pitfall: Some employers consider TDG training complete once a worker receives the training certificate. The certificates go into a file, and nobody pays attention to them until they

expire. Then, it's rinse and repeat.

Problem: TDG responsibilities and working conditions may change long before a certificate expires. Thus, workers who were properly trained 18 months ago may no longer have adequate training for the duties they perform today.

Solution: Treat TDG training as an ongoing compliance program and review training needs whenever:

- Job duties change.
- New dangerous goods are introduced into the workplace.
- Work procedures change.
- Incidents or near misses occur.
- Regulatory requirements affecting TDG operations change.

Pitfall 2. Assuming a Certificate of TDG Training Automatically Means Compliance

Pitfall: An employer assumes it complies with TDG training rules because all of its workers have a TDG training certificate.

Problem: A certificate confirms that TDG training occurred. It doesn't prove that the training addressed the worker's actual TDG-related duties or that the worker understands how to perform those duties.

Solution: The key compliance question is not whether workers have a certificate but whether they're adequately trained. To answer the "adequately trained" question, you must ask:

- What TDG duties does this worker perform?
- Did the training address those duties?
- Can the worker explain the procedures they follow?

Pitfall 3. Not Identifying All Workers Who Need TDG Training

Pitfall: TDG training must be provided to any worker who performs TDG-related functions. The tendency is to target training to “transportation” roles only.

Problem: TDG responsibilities may also be embedded within non-transportation jobs. Thus, warehouse, maintenance, laboratory, purchasing, or production workers may handle dangerous goods.

Solution: In determining the need for TDG training, consider job duties rather than just job titles. Ask: “Who in our company touches, prepares, ships, receives, transports, or handles dangerous goods?” Include workers involved in emergency response.

Pitfall 4. Providing Identical TDG Training to Every Worker

Pitfall: Some organizations provide the same course to all workers requiring TDG training, regardless of their actual job responsibilities.

Problem: Workers perform different TDG functions. A worker who prepares shipping documents may require different knowledge than a worker who loads or transports dangerous goods.

Solution: Match TDG training to actual job responsibilities. Determine whether the training the worker needs relates to:

- Classification
- Packaging
- [Shipping](#)
- Safety marks
- Documentation
- Handling procedures

- Loading and unloading
- [Emergency response.](#)

Pitfall 5. Letting TDG Training Certificates Expire

Pitfall: A worker's TDG training certificate expires, but nobody notices until an audit or inspection occurs.

Problem: In the eyes of OHS inspectors, expired training certificates raise red flags and concerns about whether workers were authorized to perform TDG duties.

Solution: Maintain a TDG training certificate tracking system that identifies:

- Certificate issue dates.
- Expiry dates.
- Workers whose certificates are getting ready to expire.
- Required retraining dates.

Responsibility for tracking should also be clearly assigned.

Pitfall 6. Ignoring TDG Training Needs When Jobs Change

Pitfall: A worker transfers to another position involving different TDG responsibilities without receiving new or adjusted TDG training.

Problem: New duties may involve different TDG requirements. For example, a worker trained to handle packaged dangerous goods may not have the knowledge needed to prepare shipments or complete required documentation.

Solution: Build TDG training reviews into your change-management process. Whenever workers change roles, ask:

- Does this person handle different dangerous goods?
- Are new TDG functions involved?
- Is additional training required before the worker performs the work?

Pitfall 7. Not Providing TDG Training to Supervisors

Pitfall: Companies train workers but overlook supervisors.

Problem: Supervisors are the pivot point for compliance to the extent they decide who performs TDG tasks, assign work, and respond when problems occur. Without the right TDG training, they may:

- Assign TDG duties to untrained workers.
- Fail to recognize TDG errors.
- Overlook expired TDG training certificates.

Solution: Ensure supervisors in charge of workers who perform TDG functions understand:

- Who requires TDG training.
- How training is tracked.
- When retraining is required.
- What TDG errors require corrective action.

Pitfall 8. Keeping Poor Training Records

Pitfall: TDG training is provided but the records are incomplete, scattered, or difficult to locate.

Problem: OHS inspectors will want proof that workers received proper TDG training. A company that can't produce training records quickly will likely raise the inspector's suspicions and scrutiny level.

Solution: Maintain organized TDG training records showing:

- Trainee workers' names
- Training dates
- Training certificates
- Expiry dates
- Who provided the training
- Any additional workplace-specific instruction.

Pitfall 9. Relying Only on Online Training Without Workplace Verification

Pitfall: An employer assumes that completing an online TDG course guarantees that workers can perform their TDG duties correctly and safely.

Problem: While they can provide important knowledge, online courses may be too generic to address every workplace-specific activity, hazard, or condition. Result: Workers understand basic TDG concepts but still make mistakes when applying them in their own workplace.

Solution: Review online training courses to ensure they're specific enough for your workplace and workers. Also supplement online training with practical verification. Supervisors should periodically confirm that workers can safely perform TDG tasks such as:

- Preparing shipments
- Applying safety marks
- Completing documents
- Handling dangerous goods
- Responding to incidents.

Pitfall 10. Not Reviewing the TDG Training Program Until an Incident Occurs

Pitfall: The company reviews its TDG training program only after something goes wrong.

Problem: A dangerous goods incident may result in injuries, environmental impacts, operational disruption, and OHS and other penalties. The name of the game is prevention by identifying TDG training deficiencies before an incident occurs.

Solution: Conduct periodic TDG training reviews to evaluate whether:

- Workers still perform the TDG duties they were trained for.
- Procedures have changed.
- Records are complete.
- Supervisors are monitoring compliance.
- Previous deficiencies have been identified and corrected.

Final Takeaway for OHS Managers

The most common TDG training failures are not caused by employers ignoring the law. They usually result from treating training as an administrative requirement rather than a safety management process.

A strong TDG training program does three things:

1. Identifies every employee who performs regulated duties.
2. Ensures training matches the work employees actually perform.
3. Provides evidence that employees remain adequately

trained over time.

Organizations that move beyond certificate management and build TDG competency into their everyday operations will be better prepared for inspections—and better able to prevent dangerous goods incidents before they occur.