

Is Your Transportation of Dangerous Goods Training Program Compliant?



Transportation of Dangerous Goods (TDG) training is simple: You just give workers awareness training and then issue a certificate documenting that they completed the training. At least that's the perception. And it's totally wrong. The problem is that many employers don't learn this lesson until after something goes wrong and an Occupational Health and Safety (OHS) inspector appears on the scene. The key to compliance is to recognize the compliance challenges of TDG training while there's still time to prevent TDG incidents and OHS penalties. Here are 14 questions you should ask to determine whether your own TDG training would measure up to an OHS inspector's standards. Go to the OHS Insider site for a [Game Plan for complying](#) with Transport Canada's new competency-based TDG training requirements.

1. Have You Identified Who Within the Company Is Responsible for TDG Training Compliance? [Yes] [No]

TDG training compliance should be treated as a designated function with a clear owner responsible for monitoring requirements, identifying deficiencies, ensuring corrective action, and [documentation](#). **Compliance Strategy:** A common

mistake is assuming that TDG compliance should belong exclusively to shipping, logistics, or transportation. While those departments typically perform many TDG functions, OHS coordinators also play an important role in ensuring proper management of training systems, records, and audits.

2. Do You Have a Written Process for Determining Who Requires TDG Training?

[Yes] [No]

TDG responsibilities for which training is required may be hidden within jobs that aren't normally considered "transportation" roles. For example, warehouse, maintenance, laboratory, purchasing, or production workers may handle dangerous goods as part of their work. That includes temporary workers.

Compliance Strategy: Companies should have a documented system for determining which workers require TDG training. In making this determination, consider not just job titles but the functions workers holding that position actually perform. Thus, you should provide training to any workers involved in TDG operations, including:

- Receiving dangerous goods.
- Consignments.
- Preparing [shipments](#).
- Packaging or labeling.
- Loading and unloading.
- Transportation activities.
- [Emergency response](#).

3. Does Your Training Reflect the Actual TDG Functions Workers Perform? [Yes] [No]

Part 6 of the TDG Regulations requires workers to be adequately trained for their assigned duties. Such training shouldn't simply provide general information about dangerous goods but also address the TDG activities workers actually perform.

Compliance Strategy: Be aware that Transport Canada has published new requirements requiring employers to ensure workers receive both general awareness and competency-based TDG training and to perform an assessment of whether workers are competent to carry out their TDG responsibilities. Although the agency hasn't yet announced when the new rules will take effect, companies and their OHS coordinators should start beginning the process of transitioning from awareness to competency-based TDG training.

4. Does TDG Training Cover Classes of Dangerous Goods the Worker Handles? [Yes] [No]

Dangerous goods pose different hazards requiring different precautions. **Compliance Strategy:** Ensure the TDG training your workers receives explains the classification requirements and the hazards and handling precautions associated with the dangerous goods they actually encounter in your workplace or in the course of their job duties.

5. Does TDG Training Address

Workplace-Specific Procedures? [Yes] [No]

TDG training can't be generic. **Compliance Strategy:** Ensure that your TDG training is tailored to the workers' functions and workplace conditions. At a minimum, it should cover:

- Internal shipping procedures.
- Storage and handling practices.
- Site-specific emergency response protocols.
- Reporting procedures.
- The worker's TDG responsibilities under company policies.

6. Does Every Worker who Requires TDG Training Have a Valid Certificate? [Yes] [No]

TDG Regulations require workers to have a "[certificate of training](#)" documenting that they received TDG awareness training. Training certificates have a limited shelf life. An expired certificate is a red flag that every OHS inspector will look for.

Compliance Strategy: Rather than just rely on workers to remember and remind you of their training expiry date, you should have a reliable certificate tracking system that provides advance notice before certificates expire and identifies workers who require retraining. You should also have a process for ensuring workers don't continue TDG activities when their certificate of training expires.

7. Do Certificates of TDG Training

List All Required Information?

[Yes] [No]

TDG certificates of training must list:

- The name and address of the employer's business.
- The trainee's full name.
- The date the training expires, written as "Expires on" or "Date d'expiration".
- The specific aspects of handling, offering for transport, or transporting dangerous goods the worker is trained to do.
- Specific TDG topics learned, which may include classification, documentation, safety marks, and/or emergency measure.
- The signatures of both the worker and the employer or its representative.

Compliance Strategy: A certificate tracking spreadsheet may no longer be sufficient if and when the new TDG competency-based training requirements take effect. Because those new rules place greater emphasis on [documentation](#), many organizations will have to expand their TDG training records systems.

8. Do You Verify that Workers Who Complete Training Are Competent to Perform Their TDG Functions? [Yes] [No]

A certificate of training merely confirms that TDG training occurred. Employers must also ensure workers actually understand and can perform their TDG duties safely. **Compliance Strategy:** Once training ends, require trainees to pass tests, engage in simulation scenarios, undergo observation, and/or provide hands-on demonstrations of their ability to perform

the TDG-related functions that training covered. Keep written records documenting the methods you used to verify workers' TDG competence.

9. Could Workers Explain their TDG Responsibilities if an OHS Inspector Asked Them to? [Yes] [No]

OHS inspectors may want to speak directly with workers if a TDG incident occurs. The objective: Determine whether workers understand and are capable of safely performing their assigned TDG duties. **Compliance Strategy:** As part of your compliance and TDG training verification strategy, you should engage in a role-playing exercise in which one participant asks another the questions an OHS inspector would be likely to ask.

10. Do You Provide New & Refresher TDG Training When Necessary? [Yes] [No]

As with any other safety training, TDG training may become insufficient when the conditions on which that training is based change, such as when workers take on new TDG responsibilities. **Compliance Strategy:** Incorporate TDG training reviews into your current OHS change-management processes. Ensure your training system is configured to flag the need for and deliver the required new, refresher, and revised training, including when:

- Workers assume new TDG-related responsibilities.
- New dangerous goods are introduced.
- Shipping, consignment, and other transport procedures change.

- Workplace processes, operations, or equipment change.
- OHS and other regulatory requirements affecting operations change.

11. Do You Investigate Whether TDG Incidents or Near Misses Indicate Training Deficiencies? [Yes] [No]

A spill, labeling error, documentation mistake, or improper shipment may be a sign that your TDG training needs improvement. And so might a near miss. **Compliance Strategy:** Review your TDG incident investigation protocols and ensure they require determination of whether training contributed to the event. Implement corrective actions in response to any training deficiencies you identify.

12. Could You Quickly Locate & Produce Your TDG Training Records During an OHS Inspection? [Yes] [No]

OHS inspectors investigating a TDG incident at your workplace will want records of the training you provide your workers. **Compliance Strategy:** Assign somebody at your company responsibility for maintaining TDG training records and ensuring that they're properly organized and immediately accessible for inspection. Those records should document:

- Who was trained.
- What TDG functions the trainee performs.
- The training that was provided.
- When it expires.

Once competency-based TDG training requirements take effect,

those records will also have to document:

- How TDG competency was assessed.
- When training and competency assessment occurred.
- The results of the assessment.
- When it expires.

13. Do You Keep Training Records for Contractors or Temporary Workers who Perform TDG Duties?

[Yes] [No]

The workers who carry out TDG functions at your workplace may not actually be on your company's payroll. **Compliance Strategy:** Identify all TDG-related functions at your site and ensure that there's a process for verifying that workers who perform them have the necessary TDG training. That includes contractor workers and temporary workers. Who will provide that training and how is something you should specifically address in your contract with the contractor or temp agency.

14. Do Supervisors Know which Workers are Authorized to Perform TDG Functions?

[Yes] [No]

Supervisors of crews that perform TDG functions must be able to determine whether workers under their charge have proper TDG training. **Compliance Strategy:** Ensure that supervisors have access to TDG training records and authority to prevent workers from carrying out tasks for which they're not properly trained. Supervisors should also be trained to observe workers

and recognize the kinds of TDG errors they may commit, such as:

- Improper labels.
- Incorrect documentation.
- Unsuitable packaging.
- Unsafe handling.
- Failure to follow safety procedures.

Takeaway: Use Checklist to Evaluate Your TDG Training Compliance

Use this Checklist as a Scorecard to determine whether your current TDG training program would satisfy OHS inspectors and [due diligence](#) standards. **Instructions:** Give yourself one point for each of the above questions that you answer “Yes” and grade yourself accordingly:

13-14 “Yes” Answers: Strong TDG training system with good evidence of due diligence.

10-12 “Yes” Answers: Generally sound program, but gaps may exist exposing you to liability for a TDG incident.

6-9 “Yes” Answers: Significant weaknesses requiring corrective action.

5 or Fewer “Yes” Answers: High-risk TDG training program that may be difficult to defend following an incident.