

TDG Competency-Based Training Compliance Game Plan



The Transportation of Dangerous Goods (TDG) awareness training system you use may soon need a major overhaul. Transport Canada has proposed to implement new TDG Competency-Based Training requirements. If and when they take effect, the new rules will require you to go beyond simply documenting that workers attended TDG training; you'll also have to demonstrate that they received training and competency-based assessment appropriate to the specific TDG functions they perform.

The New TDG Competency-Based Training Requirements

Under current TDG rules (Part 6 of the TDG Regulations), any person who handles, offers for transport, or transports dangerous goods must be “adequately trained” in their dangerous goods tasks. Exactly what “adequately trained” means has never been clear. Accordingly, Transport Canada has proposed removing the term “adequately trained” from the TDG Regulations and replacing it with the requirement that trainees be competent for TDG tasks. To accomplish this, they must receive both general awareness and function-specific training and assessment meeting the requirements of a standard for transporting dangerous goods to be developed by a federal government organization called the Canadian General Standards Board (CGSB).

First proposed in 2022, it's not clear when the new TDG training requirements will take effect. Transport Canada will first need to finalize the regulations and CAN/CGSB training standard. Companies will then have a transition period—presumably of at least one year—to bring their TDG training into compliance. But Occupational Health and Safety (OHS) coordinators should start preparing now so they don't get caught off guard when the compliance clock starts ticking. Here's a five-step compliance Game Plan:

Step 1. Map TDG Functions Across Your Organization

The new rules will require employers to demonstrate that workers not only received training but also achieved competency to perform their assigned TDG functions.

Compliance Strategy: Start reviewing TDG job functions now rather than waiting for current TDG certificates of training expire. Focus not just on titles but actual job tasks focusing on shipping, receiving, maintenance, laboratory, production, and warehouse operations. Ensure that TDG training programs are capable of identifying, at a minimum:

- The TDG functions each worker performs.
- The knowledge and skills required to perform those functions.
- The training needed to develop those skills.

Step 2. Replace “Adequately Trained” Certificates with Certification of Competence

Under current TDG training rules, employers primarily demonstrate compliance by issuing trainees a “[certificate of](#)

[training](#)” documenting that they received TDG awareness training. The new framework replaces the traditional certificate of training with documentation of successful completion of required training and assessment.

Compliance Strategy: Start thinking about the kind of [documentation](#) and methods you’ll need to demonstrate that workers achieved the required competence. Such additional methods might include passing tests, simulation scenarios, and hands-on demonstrations of ability to perform the TDG-related functions that training covered.

Step 3. Add Function-Specific Training & Assessment

One-size-fits-all TDG training will become increasingly difficult to justify. Instead, training will have to be individually tailored to the work trainees actually perform.

Compliance Strategy: Determine how you’ll identify the specific TDG functions performed by workers, including but not limited to:

- Classifying dangerous goods.
- Determining [shipping](#) requirements.
- Preparing dangerous goods consignments.
- Transporting dangerous goods.
- [TDG incident and emergency response](#).
- Performing other regulated TDG activities depending on the mode of transport and worker’s job responsibilities.

Then review your actual TDG training materials and determine what changes you’ll need to make to comply with the new competency requirements. Last but not least, verify that your trainers are qualified to deliver required competency-based training.

Step 4. Review &, if Necessary, Revise TDG Training & Assessment Records

Because the new TDG training system places greater emphasis on documentation, many organizations will need to expand their TDG training records. A certificate tracking spreadsheet may no longer be sufficient.

Compliance Strategy: Consider whether your current systems can document TDG training activities, assessments, and competency outcomes. At a minimum, ensure it can generate records documenting:

- Who was trained.
- What TDG functions the trainee performs.
- The training that was provided.
- How competency was assessed.
- When training and competency assessment occurred.
- The results of the assessment.

Step 5. Provide Additional TDG Training When Duties Change

Competency-based training and assessment will be a moving target that will require constant adjustment as conditions and worker responsibilities change.

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.