## EXECUTIVE SUMMARY

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A1. ‘STRATEGIC CHOICES’ WORKSHOP SUMMARISED FEEDBACK

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WA Heavy Vehicle Accreditation Strategic Review

The Strategic Review of the WA Heavy Vehicle Accreditation (WAHVA) scheme has identified a number of recommendations to be considered by Main Roads WA.

**TERMS OF REFERENCE**

**RECOMMENDATIONS**

1. Affirm ‘safety’ is the primary strategic objective for the scheme.
2. Retain the current threshold for the scheme to apply to heavy vehicles over 42.5 tonnes.
3. Develop Key Performance Indicators (KPIs) to allow for the assessment of the scheme’s performance against each of the strategic objectives.
4. Investigate the ability to enhance data sharing agreements between public sector agencies.
5. Enhance the digital presence of the scheme through Main Roads WA’s website.
6. Conduct an end-to-end process review for accreditation and permitting.
7. Identify processes to be reviewed for potential application of electronic workflow, interface with mobile applications and process automation.
8. Pursue options for ‘risk trading’ with operators seeking to reduce manually-intensive workflow.
9. Create processes and communication templates to generate educational examples for the scheme’s participants.
10. Incorporate incentives for the scheme’s participants.
11. Develop a risk-based audit methodology.
12. Improve the audit regime through targeted quality improvements.
13. Link accreditation status to enforcement and instances of non-conformance.
14. Develop an accreditation scale for operators focussed on continuous improvement.
15. Publish the performance of the scheme in the public domain.

Refer to page 7

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The recommendations can be commenced during the Operational Review.
Heavy Vehicle Accreditation Strategic Review

The WAHVA scheme intends to provide equitable treatment to all heavy vehicle operators, and enables operators to demonstrate that they are compliant with regulatory standards.

HEAVY VEHICLE ACCREDITATION IN WESTERN AUSTRALIA

Since 2002, operators of certain types of heavy vehicles have had to become accredited to gain a permit or order from Main Roads WA. The WAHVA scheme is mandatory for individuals and organisations that require a permit or order to perform any transport task as part of a commercial business or for profit within Western Australia, including interstate operators.

The objectives of the WAHVA scheme are to:
1. Improve road safety.
2. Increase the productivity of the transport industry through adoption of good management by responsible operators.
3. Provide management and operating standards for the transport industry.
4. Improve community confidence in the operation of heavy vehicles on State roads.
5. Satisfy the Commissioner of Main Roads (CMR) the person has systems in place required under the Road Traffic (Vehicles) Regulations 2014 to be accredited in the scheme so an application may be made to operate under a modified mass, dimension or access requirement.

The intent of the WAHVA scheme is to provide equitable treatment of all operators and to enable heavy vehicle operators to demonstrate, through an audit of their management systems, that their vehicle/s and driver/s comply with regulatory standards. The scheme is, in effect, an “operator licence”.

The WAHVA scheme involves three mandatory modules which operators are required to incorporate into their daily work practices:
1. Maintenance Management.
2. Fatigue Management.
3. Dimension and Loading,

There is also one optional module which is required to be undertaken only if an operator wishes to operate within the Accredited Mass Management Scheme (AMMS):
1. Mass Management

Accreditation does not exempt operators from complying with other requirements of the Road Traffic (Vehicles) Act 2012.
Heavy Vehicle Accreditation Strategic Review

The WAHVA scheme has not been reviewed since its inception, and requires an independent evaluation to ensure it continues to meet its strategic objectives.

INDEPENDENT STRATEGIC REVIEW OF THE WA HEAVY VEHICLE ACCREDITATION SCHEME

In August 2013, Main Roads WA announced a review of the WAHVA scheme to ascertain its ongoing effectiveness and to analyse to what extent, if any, changes were required to improve the scheme. Incremental changes have been made to the scheme over time, however, it has not been comprehensively reviewed since its inception.

In October 2017, Main Roads WA appointed Deloitte to conduct the Strategic Review of the WAHVA scheme, as part of the Heavy Vehicle Accreditation Review project. The Strategic Review will be followed by a separate Operational Review of the scheme, which will focus on operational matters, policies, processes and legislation. The Strategic and Operational Reviews are an opportunity for Main Roads WA to evaluate the overall scheme and consider any changes that may strengthen its intent and operation.

The main objectives of the Strategic Review are to investigate and assess:

• The strategic objectives and desired outcomes of the WAHVA scheme.
• The relationship between accreditation and the permitting system.
• The scope of the WAHVA scheme.
• The applicability of the WAHVA modules in achieving objectives and outcomes.
• The WAHVA scheme's alignment to the National Heavy Vehicle Accreditation Scheme (NHVAS) and relative strengths, weaknesses, opportunities and threats.

The Strategic Review will also consider the applicability of the WAHVA scheme in:

• Promoting professionalism within the heavy vehicle industry.
• Improving the roadworthiness of the overall heavy vehicle fleet and encouraging fit-for-purpose vehicles.
• Maintaining a sustainable transport industry in terms of market competition and road safety.
• Ensuring that operating profit margins are sustainable and do not encourage 'cost cutting' that compromises safety.
Strategic Objectives

Recommendations focus on repositioning the current strategic objectives to drive the desired outcomes consistent with the wider transport portfolio.

Recommendations relating to the strategic objectives of the scheme reflect the need to improve core processes before expanding its scope.

Stakeholders responded to a series of strategic questions to articulate the necessary improvements to the scheme.

The scheme is consistent with relevant State Government policies relating to road safety and occupational health and safety.

Stakeholders engaged in the Strategic Review were explicit in their support for safety being the key outcome that determined the overall success of the scheme.

1. Affirm ‘safety’ as the primary strategic objective of the scheme.

2. Retain the current threshold for the scheme to apply to heavy vehicles over 42.5 tonnes.

3. Develop KPIs to allow for the assessment of the scheme's performance against each of the strategic objectives.

4. Investigate the ability to enhance data sharing between public sector agencies.

5. Enhance the digital presence of the scheme through Main Roads WA's website.

The safety of heavy vehicle drivers, other road users and the community is of paramount importance to Main Roads WA and all industry and scheme participants. The safety outcomes and expectations of the scheme should be clearly prioritised over other strategic objectives through the WAHVA modules, the Main Roads WA website and related documentation.

The current scheme requires substantial process review and improvement to address concerns regarding inefficiencies and outdated practices. This should be undertaken before considering any expansion of the scheme. If the scheme was expanded, with the current state of processes, to include heavy vehicles greater than 8 tonnes or ‘as-of-right’ vehicles, the inefficiencies would simply be transferred to more operators and the overall quality of the scheme could be compromised.

The scheme's objectives are difficult to measure due to scarce and inconsistent reporting undertaken by Main Roads WA. A large amount of data is produced that could be used to reliably report on performance. KPIs should be clearly defined to measure the scheme's effectiveness in meeting the strategic objectives. These KPIs should be reviewed periodically and measured regularly, so that historical performance can be tracked and any issues addressed.

The Department of the Premier and Cabinet's Service Priority Review, released in late 2017 for implementation in 2018, recommended that the Government "strengthen data sharing and improve ICT performance and cyber security". Main Roads WA should leverage this recommendation and work with other agencies to identify the relevant datasets that could be used to improve the current scheme, including licensing, accident reporting and road safety.

The current WAHVA modules and overview of the scheme should be refreshed to ensure that participants can access the information easily and be informed of the strategic objectives of the scheme, emphasising safety as the priority.
Strategic Objectives

Any broadening of the current scheme may impact on its ability to deliver suitable outcomes

The Strategic Review was undertaken to consider whether the scheme delivers on its strategic objectives.

During the consultation, multiple stakeholders raised the issue of expanding the scope of the scheme to include a lower threshold (8 tonnes) or ‘as-of-right’ vehicles. However, it should be acknowledged that the view of individual stakeholders may have been determined by their own market position.

Any change to the scope of the scheme would significantly impact Main Roads WA’s ability to deliver on a number of these strategic objectives. It would also have the potential to compromise the quality of the scheme and expose inefficiencies that need to be addressed prior to any consideration of scope expansion.

Stakeholders generally acknowledged that any changes to the scope and coverage of the scheme need to address the financial viability of participants, particularly smaller operators, and the impact on the volume of accreditation the State would need to administer. This also needs to be considered against the priority to improve safety outcomes.

A high-level assessment (see table to the right) of the potential impact has been documented for the following scenarios:

A. Current state.

B. Lower threshold (tonnage reduction).

C. Inclusion of ‘as-of-right’ vehicles.

ASSESSMENT OF VEHICLE SCOPE SCENARIOS AND THEIR ABILITY TO MEET STRATEGIC OBJECTIVES

- Determine if WAHVA delivers the desired outcomes and behaviours as opposed to just compliance and enforcement.
- Improve the efficiency and effectiveness of service delivery.
- Enhance management practices and compliance assurance.
- Provide sustainable and effective road safety outcomes.
- Minimise the risk to drivers and the community.
- Complementing (not impeding) RAV access to the road network.
- Improve the productivity of the heavy vehicle industry.
- Identify and remove ‘red tape’ that may be an unnecessary burden on the heavy vehicle industry.

The current scheme is viewed to be focussed on compliance.

Process improvement will achieve greater efficiency in the scheme.

The current modules drive a focus on compliance.

The current scheme aligns with other road safety policies.

The current scheme increases safety expectations.

Improvements can be made to align permitting requirements.

The scheme requires improvement to positively impact productivity.

The current scheme requires a thorough process review to reduce ‘red-tape’.

The scheme may not be sustainable for smaller operators.

An expansion of the scheme would increase the awareness of risk.

A wider application of the scheme would create confusion for operators.

The scheme would be viewed as ‘red-tape’ by smaller operators.

A universal scheme would primarily be compliance-driven.

Additional activity would limit the ability to improve service delivery.

The audit regime should not be applied to more vehicles.

The scheme may not be sustainable for smaller operators.

An expansion of the scheme would increase the awareness of risk.

A wider application of the scheme would create confusion for operators.

The scheme would not drive productivity.

The scheme would be viewed as ‘red-tape’ by smaller operators.

WEAK

MODERATE

STRONG

ABILITY FOR SCENARIO TO MEET STRATEGIC OBJECTIVE:
Strategic Objectives

Deloitte’s ‘Cascade of Choices’ methodology provided a structure for the stakeholder workshop and anchors the recommendations of the Strategic Review.

The ‘Cascade of Choices’ methodology provided the opportunity to define a clear point of view. It enabled stakeholders to rethink current trends to design a sustainable, contemporary WAHVA scheme.

Implementing this framework will ensure that the Strategic Review is not only focused on improving the status-quo (i.e. compliance with regulatory standards), but leverages the opportunities available to deliver the greatest value to stakeholders and the public.

* The Strategic Review has addressed the initial three questions of the ‘Cascade of Choices’ methodology. ‘Capabilities’ and ‘Structures’ should be considerations for the Operational Review.
Strategic Objectives

The ‘Cascade of Choices’ has enabled strategic choices to be made to leverage opportunities and mitigate challenges

Through a structured process, Main Roads WA has been able to make key choices to increase its ability to leverage opportunities and mitigate the numerous challenges it is facing through the WAHVA scheme.

As well as helping Main Roads WA understand what it will do, these questions have equally informed Main Roads WA about what it cannot and should not do. This is particularly important for an agency trying to improve future service delivery with a clear focus and financial constraints.

Main Roads WA will need to combine rigor, creativity, new thinking and courage to respond to a number of questions (see examples in table). This will enable Main Roads WA to realise its Aspiration and overarching aims, as well as defining revised strategic directions for the WAHVA scheme and operating model (subject to the separate Operational Review*).

* The Strategic Review has addressed the initial three questions of the ‘Cascade of Choices’ methodology. ‘Capabilities’ and ‘Structures’ should be considerations in the Operational Review.
Strategic Objectives

Stakeholders provided consistent feedback on each of the strategic questions

SUMMARISED STAKEHOLDER FEEDBACK ON THE STRATEGIC QUESTIONS

ASPIRATION

WHAT SHOULD BE THE DIRECTION OF THE WAHVA SCHEME?

A sustainable and contemporary heavy vehicle accreditation scheme for WA should:
• Be unique to WA, but aligned with national standards and practices.
• Aim for best practice standards in operator safety, with a focus on driver behaviour and vehicle roadworthiness.
• Improve the overall efficiency and sustainability of the heavy vehicle industry.
• Create a foundation for innovation and adoption of technology.
• Encourage increased standards of capability within the heavy vehicle industry.

WHERE TO FOCUS

HOW SHOULD THE WAHVA SCHEME BE APPLIED?

The WAHVA scheme should focus on:
• Making a real impact on driver behaviour and vehicle standards.
• Simplicity and consistency in application.
• Progressive and real improvements in compliance performance.
• Leveraging the National Heavy Vehicle Regulator, and other industry bodies, with similar strategic objectives.
• Targeting specific outcomes.

HOW TO SUCCEED

HOW CAN THE WAHVA SCHEME BE IMPROVED?

The WAHVA scheme could be improved by:
• Enabling greater openness of data and information sharing between government and industry.
• Developing a holistic view of the objectives of heavy vehicle licensing, permitting and accreditation.
• Exploring the potential for introducing incentives, rewards, and penalties tied to accreditation performance.
• Improving operator and community confidence in auditing standards.
• Improving modules and investing in user-friendly compliance systems support.
• Providing more training and education for operators and auditors.

CHALLENGES

There are a number of challenges that Main Roads WA should consider when determining the future direction of the scheme:
• The breadth of heavy vehicle operators that the scheme applies to (ie size, capability and operating margins).
• The low level of confidence in the capability and oversight of auditors.
• The fast moving nature of technology within the transport industry with the onset of autonomous vehicles and exponential growth in data.
• Modules not encouraging improvements consistent with best practice.
• The historical difficulty of measuring the performance of the scheme aligned to measurable outcomes.
• The discrepancies in standards and practices outside of Western Australia.
• Limited sanctions available for enforcement of non-conformance.
• The behaviours driven by a “tick and flick” compliance approach.

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## Strategic Objectives

The WAHVA scheme’s strategic objectives and desired outcomes should align with government priorities to drive an integrated portfolio strategy.

<table>
<thead>
<tr>
<th>STRATEGY</th>
<th>OBJECTIVES AND DESIRED OUTCOMES</th>
<th>COMPARISONS TO WAHVA OBJECTIVES AND IMPLICATIONS</th>
</tr>
</thead>
</table>
| ROAD SAFETY COMMISSION | Towards Zero encourages WA to go “beyond standards” and eliminate death and serious injury on WA roads through:  
- Safe road use.  
- Safe roads and roadsides.  
- Safe speeds.  
- Safe vehicles. | The Towards Zero road safety strategy is consistent with the intent to affirm safety as the primary objective of the WAHVA scheme.  
WAHVA must realign with Towards Zero to ensure that safer vehicles and road use is the desired outcome that drives performance.  
The current scheme does not reflect the desire of the Towards Zero strategy to go “beyond standards”, driving integrated programs that link education, risk assessments, regulation and enforcement. There is an opportunity for the scheme to implement a more integrated approach. |
| MAIN ROADS WA | Main Roads WA aims to “Keep WA Moving” by:  
- Providing a transport network centred on what customers need and value.  
- Improving mobility of people and the efficiency of freight.  
- Developing a sustainable transport network that meets social, economic and environmental needs.  
- Providing improved safety outcomes for all users of the transport network. | The WAHVA scheme’s strategic objectives do not reflect the intent of Main Roads WA to improve the sustainability of the transport industry. The WAHVA scheme could invest in innovation and promote adoption of technology to drive productivity and sustainability improvements for the heavy vehicle industry, although this should not be at the cost of safety outcomes.  
Main Roads WA intends to drive decision making based on data and feedback of customer needs and value. The scheme has no mechanism to feedback operator needs and performance to optimise accreditation. |
| DEPARTMENT OF TRANSPORT | The Department of Transport (DoT) aims to have the best integrated and intelligent transport services and solutions for the State. To achieve this vision, the DoT has outlined five key result areas:  
- Strategic transport leadership.  
- Strategic relationships.  
- Customer centric, security and safety orientated service design and delivery.  
- People.  
- Organisational capability. | The DoT emphasises the need to drive an integrated transport portfolio. The WAHVA scheme needs to harness a more integrated approach to driving strategic outcomes, particularly in relation to enabling data and information to be shared across agencies, avoiding duplication of processes and exploring the potential for introducing sanctions for non-conformance.  
The DoT objectives show a greater intent to drive customer centric and safety orientated solutions or processes. |
| AUSTRALIAN WORK HEALTH AND SAFETY | Australian Work Health and Safety have articulated four target outcomes aligned with the vision of healthy, safe and productive working lives:  
- Reduced incidence of work-related death, injury and illness.  
- Reduced exposure to hazards and risks.  
- Improved hazard controls.  
- Improved work health and safety infrastructure. | The Australian Work Health and Safety strategy emphasises the need for a responsive and effective regulatory framework to provide improved health and safety infrastructure for WA. In order to be responsive, the WAHVA scheme must be able to measure the scheme’s performance and effectiveness in meeting outcomes and creating industry improvements.  
The WAHVA scheme reflects the strategy’s focus on systematically managing risk at the workplace level, placing an emphasis on ensuring that operators have the right management systems in place to mitigate safety risks. |
ACCRREDITATION AND PERMITTING
Accreditation and Permitting

Recommendations focus on establishing a holistic view of accreditation and permitting and using technology to improve efficiency and reduce ‘red tape’

Stakeholders consistently expressed their support for the greater use of technology to improve the application of accreditation and permitting processes.

The scheme’s cumbersome, manual processes have been frustrating to operators and are contrary to the objective of reducing ‘red tape’. Stakeholders would like to see the introduction of e-workflows and process automation. The routine nature and established standards for accreditation and permitting make these suitable candidates for these improvements.

The concept of ‘risk trading’ will also reduce manually intensive workflows and promote improved operator compliance performance.

Introducing process automation, e-workflows and encouraging the adoption of other technological improvements by operators may create behavioural change by operators where there has historically been non-compliance.

The Operational Review presents an opportunity to assess the current scheme processes and identify inefficiencies that are passed through to participants. Greater process efficiency and automation may, in time, mean that the scope of the scheme can be reconsidered. As stated previously, any attempt to broaden the scheme in its current form may compromise its effectiveness and impose unnecessary ‘red tape’ on operators.

The assessment of current processes through the Operational Review will highlight activity performed by Main Roads WA and scheme participants that is repetitive and rules-based. These processes may be considered suitable for process automation or electronic workflow. Based on stakeholder feedback, Main Roads WA should also investigate the potential for components of the scheme to be accessible via mobile applications.

Main Roads WA should seek to trial opportunities to demonstrate ‘risk trading’, where operators with adequate management systems in place can provide additional data and insight into their practices (for example, through fleetmatics systems) in lieu of manual or inefficient accreditation processes (such as vehicle inspections and specific audit procedures). ‘Risk trading’ is generally supported; however, further data and formal studies will be required to thoroughly examine how to appropriately measure and quantify ‘risk’ and measure the impact of any ‘trade’ (counter measures).

<table>
<thead>
<tr>
<th>RECOMMENDATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>6. <strong>Conduct an end-to-end process review for accreditation and permitting.</strong></td>
</tr>
<tr>
<td>7. <strong>Identify processes to be reviewed for potential application of electronic workflow, interface with mobile applications and process automation.</strong></td>
</tr>
<tr>
<td>8. <strong>Pursue options for ‘risk trading’ with operators that are seeking to reduce manually intensive workflow.</strong></td>
</tr>
</tbody>
</table>

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Accreditation and Permitting

Improving the scheme’s processes will create efficiency and identify automation opportunities

Identification of repetitive and rules-based processes as candidates for process automation and electronic workflow has been identified as a key recommendation as part of the Strategic Review.

The pathway to achieving process automation or electronic workflow is demonstrated through the automation maturity scale (illustrated, right).

Based on the current level of process maturity, the pathway to automation will require an initial focus on good process design through process and systems improvement, to be conducted in the Operational Review.

**AUTOMATION MATURITY SCALE**

**LEVEL 1**
Good process design

**LEVEL 2**
Task automation

**LEVEL 3**
Increasingly intelligent & cognitive capability

**WE ARE HERE**

**UNDERPINNED BY...**
Feedback loops and recommendations through the Operational Review

Automation of routine activities coupled with traditional process improvement

Cognitive capability to automate processes or alternate service constructs

Human interaction critical at all levels
Accreditation and Permitting

Simple criteria should be applied to determine the suitability of the process for automation

### PROCESS SUITABILITY FRAMEWORK FOR AUTOMATION

<table>
<thead>
<tr>
<th>CRITERIA</th>
<th>TYPICAL EXAMPLES AND QUESTIONS</th>
<th>EXAMPLE PASSING CRITERIA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are the data and process triggers electronic?</td>
<td>Process should rely on electronic data and, where possible, should have electronic triggers. It may be possible to adjust the process to include electronic triggers such as the receipt of an email.</td>
<td>Electronic data and triggers</td>
</tr>
<tr>
<td>Is there high transaction volume / value transactions?</td>
<td>Candidates for automation need not necessarily be limited to high value transactional processes. Any process that is labor intensive, has high throughput time or high cost impact errors and has processing peaks is a good candidate.</td>
<td>&gt; 60 emails manually processed per hour</td>
</tr>
<tr>
<td>Is there a tendency to discover errors or rework?</td>
<td>Manual activities in the process today result in a substantial number of errors due to human operator mistakes (e.g., flexibility of workforce, complexity of work or infrequency of activity).</td>
<td>&gt; 10% rework percentage</td>
</tr>
<tr>
<td>Is there high predictability?</td>
<td>The process needs to be defined in terms of a set of unambiguous business rules that describe the process.</td>
<td>Clear, defined steps in the process</td>
</tr>
<tr>
<td>Is significant manual work involved?</td>
<td>Processes with little automation support today and large chunks of manual work involved benefit more from automation, although the process does not need to be completely 'straight through processed'.</td>
<td>&gt; 70% of process time involves manual action</td>
</tr>
<tr>
<td>Is the process stable?</td>
<td>Consider if the process will be reworked anytime soon or if it will be affected by restructuring.</td>
<td>If the process is unstable, it may not be suitable to automate at this time</td>
</tr>
</tbody>
</table>
03

APPLICABILITY OF WAHVA SCHEME MODULES
Applicability of WAHVA Scheme Modules

Recommendations focus on developing incentives and educational resources for modules to drive better performance as well as improve mechanisms to measure and ensure compliance.

The applicability of the WAHVA modules has been reviewed and evaluated in the context of achieving the scheme's strategic objectives.

A number of themes were identified through stakeholder consultation and independent evaluation of the WAHVA modules. In particular, the following points were consistently linked to the applicability of the WAHVA modules to drive the desired behaviours for operators and to achieve strategic objectives:

- The complexity, manual nature and poor user-experience of the WAHVA modules.
- The inadequacy of the audit regime.
- Modules focus on compliance and management systems, rather than driving outcomes that meet the WAHVA scheme’s strategic objectives.
- The prescriptive nature of modules in ensuring a minimum compliance standard, lacking flexibility in the method of compliance and the ability to promote innovation or adoption of technology in the industry.
- The absence of a link between accreditation and enforcement, including breaches of the requirements in the modules.

RECOMMENDATIONS

9. Create processes and communication templates to generate educational examples for the scheme’s participants.

10. Incorporate incentives for the scheme’s participants.

11. Develop a risk-based audit methodology.

12. Improve the audit regime through targeted quality improvements.

The WAHVA modules primarily consist of standard checklists, procedures, document requirements, and template toolkits. The module design lacks an engaging approach with the end-users in mind and provides limited educational resources to support the scheme’s participants. Improving the user-experience of the modules and using anonymised instances of non-conformance as an educational tool will enable greater clarity and simplicity in complying with module standards.

Modules encourage a “tick the box” mentality to safety compliance and do not promote innovation and technology improvements within the industry. Incentives in return for the adoption of technology (for example, the supply of data or performance metrics) will motivate operators to move beyond compliance and shift the industry's focus to align with the scheme's strategic objectives.

Module standards and templates are largely paper-based and manually intensive methods to ensuring compliance. Auditing these modules creates a significant administrative and cost burden. Development of a risk-based audit methodology will enable higher-risk operators to be prioritised for audits to improve their performance against stated strategic objectives, as well as create greater efficiency for administrative and compliance activity.

Consistent feedback was received regarding the inadequacies of the scheme’s audit regime. In particular, there is a lack of confidence in the capability of auditors. It is recommended that the audit regime be reviewed and strengthened by focusing on the improvement and oversight of auditor appointment, rotation requirements and mitigation of conflicts of interest (both real and perceived).
Applicability of WAHVA Scheme Modules

Potential improvements relating to individual WAHVA modules have been identified throughout stakeholder consultation and independent evaluation.

<table>
<thead>
<tr>
<th>WAHVA MODULE</th>
<th>EVALUATION</th>
<th>RECOMMENDED IMPROVEMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>FATIGUE MANAGEMENT</strong></td>
<td>• Stakeholders cited that application of the Fatigue Management module to “as-of-right” vehicles may improve safety performance.</td>
<td>• Expand the module to look at broader aspects of driver behaviour.</td>
</tr>
<tr>
<td></td>
<td>• The Fatigue Management module does not directly address professionalism within the industry, which is a stated objective of the Strategic Review.</td>
<td>• Enable and encourage the use of technology, including Electronic Work Diaries for operators.</td>
</tr>
<tr>
<td></td>
<td>• The Fatigue Management module does not enable or encourage the use of technology to support fatigue management systems, such as the use of Electronic Work Diary systems to monitor and record driver times.</td>
<td>• Mature operators already collect significant amounts of data through vehicle telematics. The potential for developing mechanisms to leverage this data need to be explored, in anticipation of real-time data being available in the future to drive efficiency and compliance.</td>
</tr>
<tr>
<td></td>
<td>• Educational resources improve the overall experience for the end-user.</td>
<td>• Continue to enhance educational resource support within the module.</td>
</tr>
<tr>
<td><strong>MAINTENANCE MANAGEMENT</strong></td>
<td>• The Maintenance Management module places significant emphasis on the management system that enables compliance, rather than the roadworthiness of heavy vehicles.</td>
<td>• Explore investment in digital tools to improve ease of complying with the Maintenance Management module, reducing manual processing and increasing the ability to provide evidence of compliance.</td>
</tr>
<tr>
<td></td>
<td>• Stakeholders cited low confidence in the capability of mechanics carrying out regular vehicle checks.</td>
<td>• Increase the capability requirements of mechanics.</td>
</tr>
<tr>
<td></td>
<td>• Stakeholders cited many operators may be compliant on paper, but not in practice.</td>
<td>• Improve the way inspections are targeted and conducted.</td>
</tr>
<tr>
<td><strong>DIMENSION AND LOADING</strong></td>
<td>• The Dimension and Loading module places significant emphasis on the management system that enables compliance, rather than ensuring the roadworthiness of heavy vehicles.</td>
<td>• Develop practical and educational examples to assist scheme participants in compliance.</td>
</tr>
<tr>
<td></td>
<td>• There is very limited practical guidance to assist scheme participants in ensuring compliance.</td>
<td>• Consistent with the Maintenance Management module, improvements could be made regarding the way that inspections are targeted and conducted.</td>
</tr>
<tr>
<td><strong>MASS MANAGEMENT</strong></td>
<td>• Stakeholders cited that there are inconsistencies in the application of the Mass Management module, relating to permitting processes in particular.</td>
<td>• Simplify and enable greater consistency in the application of the Mass Management module. Consider how the permitting process impacts the accreditation scheme's strategic outcomes, in particular relating to fees for operator road access for large mass vehicles.</td>
</tr>
<tr>
<td></td>
<td>• Provision of loading control guides, loading plan templates and loading plan examples are useful for operators guiding their application of the Mass Management module.</td>
<td>• Continue to enhance educational resource support within the module.</td>
</tr>
</tbody>
</table>
04

JURISDICTIONAL COMPARISON
Jurisdictional Comparison

Recommendations focus on integrating accreditation with enforcement, encouraging progressive improvement consistent with best practice and clarifying the desired outcomes.

Desktop research into the National Heavy Vehicle Accreditation Scheme (NHVAS), as well as accreditation schemes or regulatory requirements in other jurisdictions, was conducted to assess the comparative strengths and opportunities for improvement of the WAHVA scheme.

Research suggests that there is significant variation in the approaches to ensuring road safety and improving sustainability, productivity and efficiency within the heavy vehicle industry across jurisdictions. In particular, jurisdictions use a variety of methods to carry out compliance checks, measure the compliance of operators, hold operators accountable for their performance and drive innovation and improvements consistent with best practice.

The suggested recommendations encourage a greater focus on operator accountability for their performance in relation to the WAHVA scheme, as well as accountability for driving strategic objective outcomes.

RECOMMENDATIONS

13. Link accreditation status to enforcement and instances of non-conformance.

Through an assessment of other jurisdictions and stakeholder feedback, it became evident that a lack of sanctions or enforcement mechanisms for non-conformance may hinder the ability to instil the right behaviours within the industry. Linking accreditation status to enforcement and instances of non-conformance may enable the scheme to drive strategic objectives more effectively, and make a greater impact on driver behaviour and operator practices.

14. Develop an accreditation scale for operators focussed on continuous improvement.

The WAHVA scheme is focussed on ensuring a minimum compliance standard is upheld by heavy vehicle operators. The scheme currently has no mechanism in place to recognise high performing operators or to encourage innovation in practices. An accreditation scale would enable operators to differentiate themselves in the industry and therefore encourage innovation as well as improved productivity, efficiency and safety practices.

15. Publish the performance of the scheme in the public domain.

Stakeholders cited that it is difficult to directly correlate the strategic objectives of the scheme to measurable outcomes. Assessment of the NHVAS also indicated that other jurisdictions are able to more effectively align their scheme to measurable outcomes. Defining Key Performance Indicators (KPIs), measures and publishing performance in relation to these in the public domain may improve community confidence in road safety and ensure that the scheme is clearly aligned with its purpose.
### Jurisdictional Comparison

A number of schemes and jurisdictions were reviewed to assess the comparative strengths and opportunities for improvement.

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Scheme</th>
<th>Is the scheme compulsory or voluntary?</th>
<th>What is the tonnage scope of vehicles the scheme applies to?</th>
<th>Does the scheme involve a risk-based compliance mechanism?</th>
<th>Does the scheme promote a minimum compliance standard or progressive improvement?</th>
<th>Is data leveraged to inform operator performance?</th>
<th>Does the scheme produce a quantifiable risk or safety rating for operators?</th>
<th>Is good performance incentivised through a less rigorous compliance regime?</th>
<th>Does compliance with the scheme enable any operator concessions such as driver hours or weight allowance?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Western Australia</td>
<td>WA Heavy Vehicle Accreditation (WAHVA) scheme</td>
<td>Compulsory</td>
<td>Operators of truck and trailer combinations over 42.5 tonnes gross mass</td>
<td>No</td>
<td>Minimum compliance standard</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Australia</td>
<td>National Heavy Vehicle Accreditation Scheme (NHVAS)</td>
<td>Voluntary</td>
<td>Does not specify; subject to National Heavy Vehicle Law that applies to vehicles over 4.5 tonnes gross mass</td>
<td>No</td>
<td>Minimum compliance standard</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Australia</td>
<td>TruckSafe</td>
<td>Voluntary</td>
<td>Does not specify</td>
<td>Yes</td>
<td>Progressive improvement through ranking relative to other heavy vehicle operators</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>United States of America</td>
<td>Federal Motor Carrier Safety Administration (FMCSA)</td>
<td>Compulsory</td>
<td>All individuals and entities involved in operating commercial vehicles</td>
<td>Yes</td>
<td>Minimum compliance standard</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>Driver and Vehicle Standards Agency</td>
<td>Compulsory</td>
<td>A goods vehicle with a gross weight of more than 3.5 tonnes or an unladen weight of more than 1.525 tonnes</td>
<td>Yes</td>
<td>Progressive improvement through varying levels of accreditation</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>Fleet Operator Recognition Scheme (FOR5)</td>
<td>Voluntary</td>
<td>Does not specify</td>
<td>Yes</td>
<td>Minimum compliance standard</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Canada</td>
<td>National Safety Code Standards</td>
<td>Compulsory</td>
<td>Commercial vehicles with a registered gross vehicle weight of more than 4.5 tonnes and buses</td>
<td>Yes</td>
<td>Minimum compliance standard</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>European Union</td>
<td>European Commission</td>
<td>Compulsory</td>
<td>Goods carrier vehicles having a maximum mass exceeding 3.5 tonnes and buses</td>
<td>Yes</td>
<td>Minimum compliance standard</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>
Jurisdictional Comparison

National Heavy Vehicle Accreditation Scheme (Australia)

BACKGROUND AND APPLICABILITY

The National Heavy Vehicle Accreditation Scheme (NHVAS) is a voluntary compliance scheme administered by the National Heavy Vehicle Regulator. The purpose of the NHVAS is to improve road safety, increase the productivity of the transport industry through adoption of good risk management practice by participating operators and improve the operational efficiency of operators.

The NHVAS allows heavy vehicle operators to demonstrate, through the audit of their management systems, that drivers and vehicle operations comply with NHVAS business rules and module standards. In return, accredited operators in participating jurisdictions are permitted access to alternative compliance methods or concessions, such as larger mass allowances or more flexible work hours.

The scheme requires that applicants are an individual or a company registered with the Australian Securities and Investments Commission (ASIC). The scheme does not outline mass or dimension requirements for operators to be eligible for accreditation, however, under Heavy Vehicle National Law, heavy vehicles are defined as a vehicle over 4.5 tonnes gross vehicle mass.

The NHVAS is currently undergoing review by the National Heavy Vehicle Regulator. The review outcomes may impact the WAHVA scheme and will need to be monitored by Main Roads WA.

SCHEME PROVISIONS

Heavy vehicle operators can apply for accreditation under the following four optional NHVAS modules:
- Mass Management.
- Maintenance Management.
- Fatigue Management: Basic Fatigue Management (BFM).
- Fatigue Management: Advanced Fatigue Management (AFM).

COMPLIANCE MECHANISMS

An audit framework underpins the NHVAS to ensure compliance with the relevant scheme standards, outlining a common set of principles, processes and audit methodologies for the conduct, documentation and reporting of NHVAS audits.

There are two main types of audits that are to be performed on an operator’s management system under the NHVAS, an entry audit and compliance audits.

1. An entry audit is the first audit undertaken of the operator’s management system and verifies that the operator’s policies, procedures and record keeping systems will comply with the relevant accreditation standards. A successful entry audit is one of the requirements for an operator to become accredited under the NHVAS.

2. A compliance audit is conducted every accreditation period once the operator is accredited, to uphold the operator’s accreditation and confirm that the operator is still compliant. Compliance audits may also be triggered where information suggests that a scheme member may be acting in contravention of the conditions of accreditation, or randomly requested by the regulator, or third party with no prior notice.

MEASUREMENT TO STRATEGIC OUTCOMES

The National Heavy Vehicle Regulator has a publicly available defined group of key result areas (safety, productivity, sustainability and regulatory capability), all with a set of planned initiatives and defined performance measures. The National Heavy Vehicle Regulator’s strategic objectives are cascaded through to the NHVAS module standards, and operators are able to have a clear understanding of the purpose and desired outcomes of the scheme, as well as how the outcomes of the scheme will be measured.

PENALTIES OF NON-CONFORMANCE

Non-conformance to accreditation standards of the NHVAS is not linked to heavy vehicle licensing or permitting. Non-conformance is punishable by fine, or suspension / removal of the heavy vehicles concessional benefits of NHVAS membership.

Jurisdictional Comparison

TruckSafe (Australia)

BACKGROUND AND APPLICABILITY

TruckSafe is a voluntary accreditation scheme that provides a safety management system to its members, aimed at improving the safety and professionalism of trucking operators throughout Australia. TruckSafe is an industry initiated scheme, and administers an industry code of conduct, aligned with the Heavy Vehicle National Law, managed by the TruckSafe Industry Accreditation Council.

Any individual, partnership or business entity involved in a trucking operation may apply for accreditation with TruckSafe.

SCHEME PROVISIONS

TruckSafe accreditation is based on a set of minimum standards a trucking business should meet for it to be a safe and responsible operation. TruckSafe provides five compulsory accreditation modules, including:

• Management standards.
• Maintenance standards.
• Training standards.
• On-road compliance standards.
• Fitness for duty and driver health standards.

TruckSafe also provides the animal welfare module as an additional optional accreditation module.

COMPLIANCE MECHANISMS

TruckSafe members achieve accreditation through an independent audit framework.

To successfully gain accreditation, an internal review must be conducted by the operator seeking accreditation (subject to a number of requirements), followed by an entry audit conducted by an external auditor. The operator must then be given final approval by the TruckSafe Industry Accreditation Council.

The operator must also undergo their first compliance audit within six months of the first accreditation cycle. After the first compliance audit, the operator is subject to one scheduled compliance audit every accreditation period thereafter.

Upholding accreditation is not only dependent on complying with TruckSafe standards, business rules and the code of conduct, but is dependent on the accredited operator’s history of compliance with all aspects of Road Transport Law. Where data or information received by TruckSafe suggests that there is reasonable suspicion that an operator is acting contrary any aspect of Road Transport Law or TruckSafe standards, TruckSafe may request a triggered audit to be conducted. Random audits may also be conducted at the discretion of the TruckSafe Industry Accreditation Council after accreditation has been granted.

SANCTIONS FOR NON-CONFORMANCE TO ACCREDITATION STANDARDS

As an industry initiated accreditation scheme, there are no financial or license / permit demerit penalties available for non-conformance to accreditation standards. If an operator fails to conform to TruckSafe standards or breaches Road Transport Law, TruckSafe business rules or the TruckSafe code of conduct, then accreditation may be suspended or terminated.

Jurisdictional Comparison
Driver and Vehicle Standards Agency (United Kingdom)

BACKGROUND AND APPLICABILITY
The Driver and Vehicle Standards Agency (DVSA) administers the UK's heavy vehicle operator licensing and regulatory compliance requirements to be carried out by the Traffic Commissioners in the UK. Under the UK Road Traffic Act 1988, heavy vehicle operator licensing is intrinsically tied to regulatory compliance with roadworthiness standards.

DVSA heavy vehicle operator regulation applies to a goods vehicle with a gross weight of more than 3.5 tonnes, or an unladen weight of more than 1.525 tonnes (where there is no plated weight).

COMPLIANCE MECHANISMS
Operators of goods vehicles in the UK are subject to the European Union's Directives and the UK legislative interpretations of this regarding driver hours and the use of in-vehicle tachographs.

Operators are also required to carry out safety and maintenance inspections and 'walk around' checks in order to ensure their vehicles are roadworthy. These checks may be carried out themselves to comply with roadworthiness requirements, however, they must maintain safety and maintenance records of all inspections completed for a minimum of 15 months.

In order to measure compliance, operators undergo regular operating centre and roadside checks to measure driver and vehicle compliance performance. Roadside inspections include:

- Checking authorised load weights and type of load permitted.
- Checking vehicles for roadworthiness and mechanical faults.
- Looking at driver tachograph records.
- Making sure the driver has a valid occupational driving licence.

The DVSA uses the Operator Compliance Risk Score (OCRS) system, a risk-based system evaluated through data collected by DVSA over a three year rolling period, to ensure compliance and motivate operators to maintain a roadworthy standard.

The DVSA takes data from annual tests, roadside inspections and inspections at operating centres to create a combined risk score from two categories, traffic and roadworthiness. Operators are given a traffic light aggregated risk score of red, amber or green, which is used to determine which vehicles are at a higher risk of not following rules on roadworthiness and traffic regulation and, therefore, which vehicles should be prioritised for inspection.

PENALTIES OF NON-CONFORMANCE
DVSA compliance mechanisms enable both penalties regarding vehicle immobilisation or prohibition at roadside checks if the driver or vehicle are found to be non-compliant, and also license termination, suspension or restriction.

DVSA RECOGNITION SCHEME PILOT
The DVSA is currently piloting a voluntary recognition scheme for vehicles of all sizes where operators who regularly share performance information with DVSA will in return be less likely to be stopped for roadside inspections.

The recognition scheme requires operators to have IT systems for vehicle maintenance and drivers' hours that are capable of monitoring a set of Key Performance Indicators (KPIs). Every 4 weeks, these systems will notify DVSA of operator performance against KPIs and, if there is any evidence of poor performance, DVSA will work with the operator to remedy the issue/s.

The scheme requires an entry audit of systems and processes by a DVSA-approved audit provider and then an audit every two years thereafter.

The recognition scheme will enable operators to be recognised for exemplar performance against KPIs, reduce roadside and operating centre inspections, as well as give the operator access to a DVSA earned recognition business manager.

Source: https://www.gov.uk/topic/transport/vehicle-operator-licences
BACKGROUND AND APPLICABILITY

The Fleet Operator Recognition Scheme (FORS) in the UK is a voluntary, three-tiered accreditation scheme that recognises progressive improvements in compliance, safety, productivity and environmental protection, rewarding operators with a bronze, silver or gold accreditation.

The FORS Bronze accreditation is aligned with the broader UK heavy vehicle regulation and schemes to ensure that there is consistency in safety standards on the roads, with minimal overlapping. The FORS, however, promotes continuous improvement beyond this minimum compliance standard by offering progressive accreditation to operators.

FORS is not explicit regarding what vehicles may apply for accreditation, however, in order to apply a ‘single standard’ across the UK, the standards reflect the UK compliance requirements of all commercial vehicles over 3.5 tonnes.

SCHEME PROVISIONS

The FORS Standard document outlines the basic requirements for fleet operators to follow in order to achieve bronze, silver or gold recognition. The standards are divided into the following key areas:

- Management.
- Vehicles.
- Drivers.
- Operations.
- Silver progression.
- Gold progression.

FORS also offers a distinctive range of best practice toolkits and advice to support their operators beyond compliance measures, including 14+ training modules, either online or in-class, targeted at fleet operator management as well as drivers.

COMPLIANCE MECHANISMS

The FORS complements the UK’s heavy vehicle operator licensing regulation and, therefore, does not require rigorous roadside or operating centre inspections. The FORS awards accreditation through an auditing process that requires the provision of evidence of systems, procedures and documentation that demonstrate that the operator meets their standards.

The bronze accreditation audit process requires the operator to prepare evidence and request an audit to be conducted by a FORS auditor. If the audit is successful, the operator will receive a certificate awarding accreditation that is valid for 12 months. If unsuccessful, the operator will have the opportunity to resolve the action points and book a follow-up audit within 30 days of the initial audit failure.

A bronze accreditation re-approval audit must be conducted every 12 months in order for an operator to remain accredited. If the operator wishes to progress to silver or gold accreditation, the operator must provide further evidence of compliance with the accreditation standards through an online evidencing system. Silver or gold accredited operators are awarded with less frequent physical audits, requiring a bronze re-approval every two or three years respectively. Silver and gold evidence must still be supplied yearly.

SANCTIONS FOR NON-CONFORMANCE TO ACCREDITATION STANDARDS

As an industry initiated recognition scheme, there are no financial or license / permit demerit penalties available for non-conformance to the recognition scheme’s standards. If an operator fails to conform to FORS standards or terms and conditions, then accreditation may be suspended or terminated or a formal warning letter may be issued.

Source: [https://www.fors-online.org.uk/cms/operators/](https://www.fors-online.org.uk/cms/operators/)
Jurisdictional Comparison

Federal Motor Carrier Safety Administration (United States of America)

**BACKGROUND AND APPLICABILITY**

The Federal Motor Carrier Safety Administration (FMCSA) is responsible for licensing, regulating and providing safety oversight of commercial motor vehicles throughout the US, complementary to state regulation. The FMCSA’s mission is to reduce crashes, injuries, and fatalities involving large trucks and buses, and holds motor carriers and drivers accountable for their role in upholding safety on the roads through the Compliance, Safety and Accountability program. Participation in the program is a regulatory requirement.

The intent of the program is to cover all individuals and entities involved in operating commercial vehicles, including vehicles:

- Operating as for-hire carriers.
- Transporting passengers, or arranging for their transport, in interstate commerce.
- Transporting federally regulated commodities or arranging for their transport, in interstate commerce.

**COMPLIANCE MECHANISMS**

The FMCSA takes a risk-based approach to measuring and enforcing operator compliance.

New entrants to the commercial vehicle industry must undergo a safety audit within the first 18 months of operation. If the operator is found to fail a safety audit upon entry, the operators registration may be revoked and the operator may be liable for further penalties.

Following a successful safety audit, operator compliance performance is measured by the FMCSA through a safety management system work prioritisation tool. The safety management system leverages operator data to identify operators with potential safety problems, rate their relative performance compared to other operators, and prioritise operators for interventions. The safety management system reduces the need for frequent audits, and enables a more targeted approach of triggering enquiries into operators, based on risk or non-conformance.

The safety management system continuously measures operator on-road performance and compliance through analysis of behavioural and safety improvement data, such as:

- Unsafe driving.
- Crash indicators.
- Hours of service compliance.
- Vehicle maintenance.
- Controlled substances / alcohol.
- Hazardous materials compliance.
- Driver fitness.

Safety ratings for all commercial vehicle operators are made publicly available and can be obtained online by potential customers and insurance agencies. Commercial vehicle operators are incentivised to improve their safety culture and achieve a positive safety rating to remain competitive with potential customers, and to potentially receive financial incentives (e.g. reduced insurance premiums).

Where an intervention is required by the FMCSA, a tool known as the Safety Management Cycle (SMC) is used to assess how well an operator’s safety management system controls and supports safe operations, and maintains compliance. The SMC tool consists of six processes including policies and procedures, roles and responsibilities, qualification and hiring, training and communication, monitoring and tracking, and meaningful action.

**SANCTIONS FOR NON-CONFORMANCE TO ACCREDITATION STANDARDS**

The FMCSA interventions, where necessary, can invoke strong penalties for failure to comply with regulation. There are three categories of intervention, including:

- Early contact (warning letters or targeted roadside inspections).
- Investigation by FMCSA onsite or offsite.
- Follow-on interventions which may result in civil penalties or cease operation orders.

Source: [https://www.fmcsa.dot.gov/fastact/csa](https://www.fmcsa.dot.gov/fastact/csa)
Jurisdictional Comparison
National Safety Code Standards (Canada)

BACKGROUND AND APPLICABILITY

The National Safety Code Standards (NSCS) is a set of national minimum compliance standards, supported by provincial regulations and licensing, that manages the consistency of heavy vehicle regulation across Canadian provinces, encouraging safer heavy vehicles. The standards serve as a template for regulations implemented by provincial governments.

Where a commercial vehicle operator operates in multiple provinces, the NSCS applies to:
- Commercial vehicles with a registered gross vehicle weight of more than 4.5 tonnes.
- A bus with a manufacturer’s seating capability originally designed for 10 or more persons, including the driver, excluding for personal use.

SCHEME PROVISIONS

The NSCS provides 16 national standards, including eight relating to driver licensing and an additional eight relating to the commercial regime.

Safety-related standards cover carrier safety ratings, facility audits, driver and carrier profile systems, trip inspection reports, driver hours of service, commercial vehicle maintenance and inspections, and load securement.

COMPLIANCE MECHANISMS

The NSCS uses a risk-based approach, based on the safety rating framework outlined in Standard 14 of the NSCS, to ensure operator compliance.

Under the motor carrier safety framework, data relating to an operators performance is assigned to their profile to generate an overall safety rating for the operator. Operators are given a safety rating of satisfactory, satisfactory unaudited, conditional or unsatisfactory depending on their on-road or audit performance in relation to NSCS. Operators must have a safety performance rating of satisfactory, satisfactory unaudited or conditional in order to be awarded with a safety fitness certificate.

On-road inspections of commercial vehicles are typically conducted in compliance with the US’ Commercial Vehicle Safety Alliance (CVSA) roadside inspection requirements. The provinces and territories are responsible for the enforcement of safety on Canada's roads and highways, including carrying out roadside inspections.

Under Standard 15, facility audits are conducted on operators when:
- They are operating under a conditional safety rating.
- A serious safety incident has occurred and investigation is required.
- An operator has surpassed the predetermined accident threshold.
- The operator requests an audit to improve their safety rating.
- Upon request from another jurisdiction.
- Operators have limited performance data available.

Jurisdictional Comparison

European Commission (European Union)

BACKGROUND AND APPLICABILITY

There are a number of Directives outlined by the European Union (EU) that require European Union Member States to ensure ongoing roadworthiness of heavy vehicles, as well as uphold standards for driver behaviour.

Directives apply primarily to commercial vehicles with a design speed exceeding 25 kilometres per hour including:

- Passenger carrier vehicles comprising more than eight seating positions in addition to the driver seat.
- Goods carrier vehicles having a maximum mass exceeding 3.5 tonnes.
- Goods or passenger carrier trailers having a maximum mass exceeding 3.5 tonnes, and
- Wheeled tractors for commercial road haulage purposes, with a maximum design speed exceeding 40 km/h.


COMPLIANCE MECHANISMS

The EU uses a risk-based approach to measure compliance with commercial vehicle roadworthiness and driver behaviour related Directives.

Under the Directives, Member States are required to comply and conduct periodic and roadside roadworthiness tests. Data gathered through inspections is input into a risk profiling system that allows high risk vehicles to be more easily identified and monitored by Member States through roadside inspections.

The risk-based rating enables higher-risk operators to be monitored closely and lower-risk, high performance operators to be rewarded with less frequent inspections, creating less unnecessary administrative and cost burdens, and increasing efficiency in upholding safety standards.

The risk rating system considers the number and severity of deficiencies identified in roadside tests, the number of technical roadside inspections or periodic and voluntary roadworthiness tests conducted, and the time elapsed since the last inspection when developing a risk rating for operators.

A distinctive feature of the EU’s vehicle regulation is the embedded support of technology and innovation in ensuring a sustainable, safe and efficient transport industry. For example, the EU requires all vehicles of over 3.5 tonnes transporting goods by road, and in vehicles that can carry more than nine people (including the driver), to be installed with digital tachographs to measure compliance with Directives.
A1

‘Strategic Choices’
Workshop Summarised Feedback
Strategic Objectives
Summarised raw feedback from the ‘Strategic Choices’ workshop (1)

**ASPIRATION**
**WHAT SHOULD BE THE DIRECTION OF THE WAHVA SCHEME?**

**UNIQUE TO WA**
- A safety system that supports WA’s unique geographical and population factors.
- Create alignment and leverage the NHVAS where appropriate, but maintain what is specific to WA.

**OPERATOR SAFETY**
- Focus on improving driver and vehicle standards to work towards the objective of “Towards Zero”.

**EFFICIENCY AND SUSTAINABILITY**
- Provide the infrastructure that enables industry to operate efficiently and sustainably.
- Target productivity improvement as defined by the industry, not government.

**CREATE A FOUNDATION FOR INNOVATION AND TECHNOLOGY OF THE FUTURE**
- Enable the flexibility to promote new ideas and technology.
- Reward the pursuit of new technologies.

**CAPABILITY UPLIFT**
- Create greater confidence in the capability of mechanics and auditors who measure compliance.
- Educate and create greater awareness around the objectives of the scheme and its desired outcomes.
- Develop more targeted training programs that are relevant for the end users.
Strategic Objectives
Summarised raw feedback from the ‘Strategic Choices’ workshop (2)

WHERE TO FOCUS
HOW SHOULD THE WAHVA SCHEME BE APPLIED?

FOCUS ON DRIVER BEHAVIOUR AND VEHICLE STANDARDS
• Focusing on management systems and providing paper-based evidence of compliance is not enough to ensure that operators are doing the right thing.
• The scheme should focus on creating a real impact on driver behaviour and improving the quality and safety of heavy vehicles on the road.
• Inspect cars on the road with external mechanics.

SIMPLICITY AND CONSISTENCY IN APPLICATION
• Drive consistency for all commercial vehicle operators, including “as-of-right” vehicles.
• Ensure consistency regardless of origin and location (Local Government).
• Focus on the operators and their vehicles, rather than road quality.

APPLY AS MORE THAN A “BOX TICK” EXERCISE
• Focus on real improvement in operator performance, rather than paper based compliance.
• Take a less prescriptive approach to enforcing the way compliance is demonstrated.
• Align accreditation standards with best practice in the industry, and encourage advancements and innovation.

COMPLEMENT AND TRUST THE NATIONAL HEAVY VEHICLE REGULATOR AND OTHER BODIES WITH SIMILAR STRATEGIC OBJECTIVES
• Overcome industry silos and encourage data and information exchange.
• Share operator risk and lessons learnt with the National Heavy Vehicle Regulator.

TARGET SPECIFIC OUTCOMES
• Take a more targeted approach to compliance, and define specific triggers to monitor, action and enforce.
Strategic Objectives
Summarised raw feedback from the ‘Strategic Choices’ workshop (3)

**HOW TO SUCCEED**
**HOW CAN THE WAHVA SCHEME BE IMPROVED?**

**ENABLE GREATER OPENNESS OF DATA AND INFORMATION TO BE LEVERAGED BY MAIN ROADS AND INDUSTRY ENTITIES**
- Enable faster and more open movement of data and information to drive better safety outcomes.
- Increase transparency of operators safety performance.
- Leverage GPS technology to monitor road access and make informed decisions.

**DEVELOP A HOLISTIC VIEW ON THE OBJECTIVES OF HEAVY VEHICLE LICENSING, PERMITTING AND ACCREDITATION**
- Address conflicting objectives from licensing, permitting and accreditation that may influence strategic objective outcomes.

**INCENTIVISE, REWARD AND ENFORCE PERFORMANCE OF OPERATORS**
- Tie operator performance to accreditation and explore the potential to implement a broader range of sanctions and rewards.
- Encourage and incentivise new technology uptake by operators including automation and vehicle telematics.

**IMPROVE CONFIDENCE IN AUDITING STANDARDS**
- Ensure clarity and consistency in application of audit frameworks.
- Ensure random selection, rotation and declarations of conflict of interest for auditors.

**IMPROVE MODULES AND INVEST IN SYSTEM SUPPORT**
- Expand fatigue management to look at broader aspects of driver behaviour such as mental health.
- Drive greater consistency in module application (Mass Management).
- Invest in technology solutions to create a better.

**PROVIDE MORE TRAINING AND EDUCATION FOR OPERATORS AND AUDITORS**
- Improve the awareness of the scheme, its objectives and purpose.
Strategic Objectives

Summarised raw feedback from the ‘Strategic Choices’ workshop (4)

CHALLENGES

POTENTIAL CHALLENGES THAT MAY THREATEN THE SUCCESS OF THE WAHVA SCHEME

BREADTH OF HEAVY VEHICLE INDUSTRY
- “One size fits all” standards and accreditation requirements may threaten the operating margins of smaller operators and dilute the outcomes of the scheme.

LOW CONFIDENCE IN AUDITOR INDEPENDENCE AND CAPABILITY
- Lack of confidence in the capability and independence of auditors.
- Inconsistent approach to auditing.
- Variable cost and availability of auditors across geographical locations.

DATA AND TECHNOLOGY
- Fast moving technology improvements causing continuously outdated approaches to accreditation.

MODULE DESIGN
- Modules may simply provide greater barriers for operators to focus on improving safety outcomes.

MEASURING OUTCOMES
- Performance of the scheme has been hard to measure as WAHVA strategic objectives and modules standards have not been aligned to measurable outcomes.

SANCTIONS
- Very few operators lose accreditation.
- There is only one sanction currently available for enforcement.

DISCREPANCIES AMONGST STATE PRACTICES
- Not integrated with national standards, or other states practices.

“BOX TICK” COMPLIANCE
- Operators may be considered compliant merely if they have the correct paper trail rather than being compliant in practice.
- Minimum compliance standards alone may not embed the right behaviours of operators.