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Good Practice and ALARP: A Pragmatic Approach for Medium Sized Operators

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ABSTRACT

In Australia and New Zealand, operators of Major Hazard Facilities (MHFs) must demonstrate that risks to health and safety have been reduced as far as is reasonably practicable (ALARP/SFAIRP). Central to this requirement is identifying, implementing, and maintaining good engineering practice. Medium sized MHFs face a particular challenge: they operate between multinational organisations with extensive engineering standards and smaller operators for whom bespoke risk studies are often costly.

This paper presents a pragmatic approach for medium sized MHFs to apply good practice, avoiding both rigid rules-based compliance and overly complex risk-based engineering. Good practice sets the essential baseline for managing major hazards. ALARP demonstrations that do not first establish compliance with relevant good practice risk being inconsistent and difficult to defend.

Good practice is defined as publicly available, authoritative information widely adopted across the industry, which a reasonable operator should know. It is not determined by personal opinion. If an operator chooses not to implement a recognised good practice measure, they must provide a clear technical justification showing that their alternative achieves the same intent.

Good practice is a prerequisite to any credible ALARP argument. ALARP should inform decisions beyond this baseline, such as deviations from established practice or additional site-specific measures. However, identifying good practice can be challenging, as industry standards often use permissive language and regulatory guidance avoids prescriptive requirements. This ambiguity is especially difficult for medium sized operators with limited engineering resources.

Through practical examples—such as interpreting industry standards, learning from incidents, and atmospheric storage tank overfill protection—the paper highlights common pitfalls in applying good practice. It distinguishes between good practice (the minimum acceptable standard that underpins ALARP) and best practice (leading-edge solutions adopted by few, which are discretionary).

The paper concludes that sustainable process safety performance in medium sized MHFs is best achieved by establishing a defensible good practice baseline and applying risk-based ALARP reasoning only when deviation from that baseline is justified.

KEY WORDS

Major Hazard Management

Process Safety Management

RAGAGEP

Good Practice

Risk-Based Decision Making

Standards Interpretation

Incident Learnings

BIOGRAPHY

Mike La Franchie is a process engineer specialising in process safety, with 23 years' experience working in major accident hazard (MAH) environments. He currently advises process safety practice across Major Hazard Facility operations in six different countries, applying a consistent, technically defensible approach across diverse regulatory frameworks. His expertise includes hazard identification and risk assessment, interpretation and application of recognised and generally accepted good engineering practice (RAGAGEP), standards interpretation, and the use of incident learnings to support robust ALARP demonstrations. His work focuses on pragmatic, risk-based major hazard management that can be applied consistently across multiple jurisdictions

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