The Objective

Facilities that are safe and without risk to the health of any person at or near them.
The Operator’s General Duty

The operator of a facility must take all reasonably practicable steps to ensure that the facility is safe and without risk to the health of any person at or near the facility*

* Subclause 9(1)(a) of Schedule 3 to the Offshore Petroleum and Greenhouse Gas Storage Act 2006
Where we are now
Context: Legislative framework (Safety)

Stages in the life of a facility:
- Exploration & Appraisal
- Concept Evaluation
- Conceptual Design
- FEED
- Detailed Design
- Overseas Construction
- Field Construct & Install
- Operate (Production)
- Modify
- Decommission

Legislative framework:
- P(SL)A Schedule
- P(SL)A MoSoF Regulations
- OPS Regulations
- OPGGS(S) Regulations
Context: The Rise of Gas

SoV Flexibility

Fee for assessment of a safety case for a proposed Facility

Submission for Assessment, Scope, Feedback

Production

Modify

Decommission
Early Engagement Today: Participants

- Concept Selected
- Conceptual Design
- FEED
- Detailed Design
- Overseas Construction
- Field Construct & Install
- Production

Early Engagement Safety Case Assessments to-date

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Early Engagement Today: Experiences

• Positive feedback regarding process

• Useful introduction for new operators

• A limited opportunity to question:
  – Safety & design philosophies
  – Concept selection
  – Design choices
  – ALARP demonstration
Early Engagement Today: Challenges

• No provisions for Concept selection & Design
• Dialog constraints (requests for further information)
• Decision making focus of the regulations
• Optional process, no submission trigger

= Sub-optimal arrangements with limited potential to improve safety outcomes.
Drivers for change
Reasonable Practicability

Cost to avert

Risk
Bounded Practicability: The Risk Playing Field(s)

High Risk

Low Risk

Concept

Design

Construct, Install, Operate, Modify, Decommission
Reasonable Practicability: Passage of time

- Conceptual Design
- FEED
- Detailed Design
- Overseas Construction
- Field Construct & Install
- Production Starts

Reasonable opportunity to challenge

Cost to change

Time

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Where we are headed
Future Directions: work in progress

• Research & evaluation of options
• Design notification:
  – Focus on concept selection & design
  – Required for production facilities
  – Submitted no later than a Field Development Plan
  – Basis for ongoing dialog transitioning into submission of a safety case
Conclusion

*Effective provisions for early engagement:* increasing the likelihood that future production facilities are safer and with lower risk to the health of any person at or near them.
Our Vision
A safe and environmentally responsible Australian offshore petroleum industry.

Our Mission
To independently and professionally regulate offshore safety, integrity and environmental management.