**ICS / RIGHTSHIP MEETING**

**ICS members anonymised feedback – August 2024**

1. Why is a Class status report not acceptable & a Flag State report is required for high performing vessels / companies where a recent PSC report is not available?
	1. This relates to a vetting rule whereby if there is no “PSC” inspection of the vessel in the last 24 months then alternative means of equivalence should be sought. An extreme equivalence could be enforcing a RightShip Inspection however we obviously realise this could be quite unfair. We could just ask for a copy of the narrative report for the last visit by Class, but this could have been just a specific Class or Statutory Survey. We believe the best alternative equivalence is to request a copy of latest Flag Inspection. The point is that in order to provide robust vetting recommendations to our customers – we need to see evidence of third party oversight more often than every 24 months.
2. There are ongoing technical problems with the RightShip online portal, which RightShip insist works and must be used.
	1. We would need further information/specifics on the technical issues being reported to be able to comment further.
	2. RightShip is aware of challenges accessing the portal at times within China due to firewall restrictions and has been actively working on resolving these issues as and when reported.
	3. Any technical issues can be logged via a Ticketing system available within the platform to all users, including non-subscribers.



1. Why do RightShip request a 'Crew Welfare Assessment' with no regard for MLC compliance?
	1. MLC Compliance sets a very basic level for crew welfare. The SSI Crew Welfare Self Assessment is a continuous improvement model of what industry best crew welfare should look like. Vetting and scoring is a beyond compliance approach.
2. GHG assessment – why would the vessel need a further assessment when it is compliant with all relevant legislation and have the certificates to prove it?
	1. The GHG Rating is not checking for regulatory compliance. Any documentation requested is used to verify the calculation of a vessels GHG Rating. A verified GHG Rating is a more accurate reflection of a vessels environmental credentials and is used by charterers as a comparative measure of relative efficiency between similar type and size of vessels they may be considering chartering.
3. Vessels over 8,000 DWT at 14 years old must be inspected. 14 years old seems an odd age to pick & not in keeping with the normal / special survey renewal dates. Can RightShip provide an explanation as to the rationale?
	1. RightShip will be revising its inspection criteria in 2025 to more closely align with special surveys. More details will be published in Q4-2024.
4. There is an extensive questionnaire for new build vessels which have just been Flag and Class approved as part of the delivery, which is adding to the administrative burden, can RightShip explain why this is necessary?
	1. Class and Flag information and surveys held as part of new build delivery has many data gaps germaine to our vetting recommendations. For example, the questionnaire calls for information on operators change process for delivery acceptance not included within Classing and Flagging acceptance protocols.
5. Requesting shipping companies to proactively upload Class status reports for all vessels in the fleet every 30 days, with no guarantee further requests will not be added, which is adding to the administrative burden, can RightShip explain why th is necessary?
	1. RightShip is committed to providing the industry the best due diligence service possible and Class Status reports are an important part of this given the insights they provide. Equally important to customers is the timeliness of a vetting decision from RightShip and as such we have taken steps to make it as easy as possible for willing Operators to pre-submit required documentation to RightShip for review for free to reduce surprises and time delays when the vessel is vetted by a charterer. Important to note submitting the Class Status and other data to remain charter ready is not mandatory. Those who do choose to submit proactively benefit from more frictionless chartering decisions which has been well received by most market participants.
6. RightShip are about to introduce a Ship inspection campaign (223 page document) which duplicates Flag / Classification Certification. With questions like 'Is the vessel manned as per the minimum safe manning certificate', which is adding to the administrative burden, can RightShip explain why this is necessary?
	1. The RISQ, was introduced in May 2021 and in use since then. It iis a compilation of not only Flag and classification society requirements (referred to as regulatory requirements) but also industry recommendations and practices. The changes to RISQ are a result of collaboration and feedback from the industry to improve and align RISQ with industry requirements. This has resulted in three revisions so far, for which we are thankful to the stakeholders who contributed to RISQ. A summary of the major changes to RISQ 3.1 can be found in Annex A of the document. Important to note that the reason the document is comprehensive, is to assist the industry, and the requests for detailed guidance. Which is included.
	2. Question 2.4 is the most important question for any risk-based inspection, such as SIRE, CDI, and RISQ programs. It ensures that the ship is sufficiently and effectively crewed by checking the minimum number against the actual number of personnel on board, verifying the minimum qualifications of personnel against their actual qualifications, and ensuring that personnel have been allocated tasks for which they have been trained. Additionally, it ensures that the conditions under which the level of minimum manning was defined (for example, manned/unmanned machinery space) meet the actual operational status of the ship at the time of inspection. So far in 2024 there have been 17 findings related to safe manning requirements. Although the ratio of these findings is 1%, the severity of non-compliance with Q2.4 is the reason this item continues to be included.

1. Minor injury / incident details such as FACs, minor damages etc. which are trivial & are picked up from OCIMF SIRE reports (not observations but inspector comments). Detailed Incident/Injury report requested for same to clear vessel which should be avoided.
	1. Our process is no different to that adopted by the Oil Companies. Referring to the Near Miss to Significant Event pyramid – all those apparently minor events should be properly investigated and lessons learned.
2. An anchor loss incident was reported during the screening of the vessel, initially it was entered into the database as Cat C (but not included in the safety score), subsequently it was changed to Cat C, which affected the Safety Score. The process for such changes should be made clear to all for better understanding.
	1. Incidents flow into the RightShip platform from a range of sources and are automatically categorised based on the initial information available in the report. RightShip takes a cautious approach and if there is not enough information to accurately assess the incident it may be excluded from the Safety Score for a short period of time whilst further information is gathered. Once our vetting team have received additional information, including an investigation report with root cause analysis both the Category (severity) of the incident and its inclusion in the Safety Score may be updated. Further details on the incident categorisation can be found here [Technical Information (rightship.com).](https://rightship.com/technical-information?nid=481)
3. RightShip inspection was arranged basis Charterers requirement, and after closing out the inspection the validity was given for only (3) months, and the rationale behind it was that the RightShip inspection was not carried out regularly. In spite of having regular Vessel Manager inspections, Internal Audits, good PSC performance and no incidents, this was not sufficient enough to increase the validity of the inspection to (12) months. The process basis which reduced intervals for successive RS inspections are required should be more transparent, as currently it appears quite arbitrary.
	1. The RightShip Inspection validity is awarded based only on the performance in the last inspection. This takes into consideration:
		1. Number of findings
		2. Severity of the findings
		3. Multiple findings in the same category
		4. Quality of the managers findings closeout
	2. We will be publishing further guidance on this in the coming months alongside our updated RISQ 3.1 checklist.
4. At times when a feedback report (FBR) is raised for a vessel and closed satisfactorily with all parties and RightShip - then the same FBR also shows up as incident - leading to duplication. This should be avoided.
	1. Ports & Terminals are unable to enter incidents which happen within their Ports, Berths and Terminals directly into the RightShip Platform and as such may raise them via the Feedback Reporting system. If they qualify as a recordable incident per our publicly available incident descriptions ([Technical Information (rightship.com)](https://rightship.com/technical-information?nid=481)) then an incident is raised. The Feedback Report itself does not affect the vessels Safety Score and once closed would not impact the vet so there is no duplication of impacts. The Feedback Report is a reporting tool/process whereas the Incident record is a statement of fact about an event in the vessels history.
5. Slow response from RightShip on the concern / query from managers / owners related to GHG rating / an incident rating downgrade appeal, which is seriously affecting the vessel commercial acceptability at times. There should be a minimum turnaround time for an response.
	1. We would need further information/specifics on the issues being reported to be able to comment further.
	2. We do track response rates and for GHG requests these have averaged 0.12 days for 2024. For incident categorisation appeals, the time to assess any new information presented by a certain Manager varies widely based on the specific case, nature and categorisation of the incident and commonly they involve a series of discussions and reviews of the information involved to then re-affirm the category, or in the case of new material information, finalise reassessment and close out.
6. Sub Score summary states “PSC deficiencies are relative to the places(s) of incidents of inspection”. This has to be provided and clearly defined because we are yet to see different levels of downgrade for same number of deficiencies in different ports per above definition.
7. **Relative Performance Measurement:** The assessment of a vessel's PSC deficiencies is not only based on the number of deficiencies found but also on how these numbers compare to the average deficiencies typically observed at the specific port where the inspection took place.



**Example Illustration:** In the provided screenshot, two separate PSC inspections have resulted in one deficiency each. However, the implications of these deficiencies differ because the average number of deficiencies at each location varies:

* In Brazil, the average number of deficiencies is 0.50. A single deficiency here results in a relative performance factor of 1.09, indicating a performance worse than average.
* In Barranquilla, the average number of deficiencies is higher, at 2.03. Therefore, a single deficiency results in a relative performance factor of 0.40, which suggests an average performance at this location.

**Impact on Subscore Calculation:** These relative performance factors are then used in calculating the PSC Deficiency Subscore over specified time windows. For instance, the inspection in Brazil contributes a factor of 1.09 to the 12-24 months window calculation, reflecting a worse-than-median performance, while the inspection in Barranquilla contributes only 0.40, indicating an average performance.

1. The retrained model for assessment of impact in Safety Score needs review. Weightage should be given to the number of ships operated under the DOC and the Incident frequency rate. With the current system a Cat A incident results in the DOC score being dropped to 3, irrespective of whether the DOC operates 1 ship or a 100 ships. This is an inaccurate reflection of the DOC holders performance. This needs further review and to incorporate feedback from the industry.
	1. RightShip is committed to driving towards a maritime industry that causes zero harm. Category-A incidents include loss of life, total losses, serious or deliberate pollution and abandonment of seafarers. We firmly believe that just one of these incidents regardless of your DOC size is one too many. Prior to the retrain a large DOC could afford multiple Category A events in a 5 year period without any detrimental impact on their rating due to the scale of their fleet. This update to the DOC sub score updates the model to better reflect our Zero Harm ethos.
2. Under the current system the Safety Score of a vessel cannot be higher than the DOC score of the operator. This may not provide an accurate representation of the performance of the vessel as a vessel operating at a Safety score of 5 with ZERO incidents, PSC observations, breakdowns, etc. is brought down to a Safety score of 3 overnight if the DOC score drops due to reasons similar to the point above. Again for a large fleet of vessels this unfairly penalizes all ships within the DOC. This need further review and to incorporate feedback from the industry.
	1. RightShip has made some minor modifications to the above DOC sub score rule relating to Category A incidents to reflect the importance of a thorough incident investigation and the role they play in implementing effective preventative actions to avoid recurrence. See [Technical Information (rightship.com)](https://rightship.com/technical-information?nid=187) for more details.
3. We have had instances of a) Main engine stoppage by ship staff themselves to carry out main engine maintenance in open sea, b) gantry crane breakdowns due to severe weather etc., being recorded as incident Category C affecting Safety Score. The categorization of incidents should be more pragmatic and practical.
	1. These sorts of events if supported by evidence would be reviewed by our vetting superintendents and the incidents recategorised or the items excluded from the Safety Score. Further details on the incident categorisation can be found here [Technical Information (rightship.com).](https://rightship.com/technical-information?nid=481)
4. The algorithm is based on PSC performance over 60 months, suggest PSC performance of 36 months should be included in Safety Score calculation. This will give an more accurate representation of the vessel.
	1. Availability of data in a suitable volume covering all vessels is key to running a rating system hence 60 months being selected. However, we are always looking to improve the Safety Score and if we can find additional data to insert into the model then a reduction in time interval would be considered in future developments of the Safety Score.
5. The vessel’s safety score is benchmarked against the size and deadweight of worldwide fleet. This means safety score of vessels without any adverse PSC performance and/or incident may drop depending upon better performance of vessels of similar size/deadweight. This algorithm is detrimental and will end up penalizing vessels incorrectly.
	1. The Safety Score does not function in the way described as a benchmark based on size and deadweight. Full details can be found here [Technical Information (rightship.com).](https://rightship.com/technical-information?nid=75)
6. Adverse feedback report being issued in relation to deficiencies noted by AMSA inspection during vessel’s call to Port. This is incorrect as in any event we will be submitting the closeout for the PSC inspection so creating an adverse feedback report for same is duplication.
	1. Ports & Terminals are unable to enter port state control into the RightShip Platform and as such may raise them via the Feedback Reporting system. The Feedback Report itself does not affect the vessels Safety Score and once closed would not impact the vet so there is no duplication of impacts. The Feedback Report is a reporting tool/process whereas the Port State Control record is a statement of fact about an event in the vessels history.
7. Lack of transparency as well as uncertainty as to RightShip’s handling of information seem to be the two main issues according to our members. Please find below their feedback.
8. “We share the same feeling around the RightShip ratings, as there is NO clear guidelines how they are giving the rating to a Company and to the vessels for the safety scores.
	1. Please see [Technical Information (rightship.com)](https://rightship.com/technical-information?nid=481) for full Safety Score methodology. Our website and youtube channel also includes webinars and videos detailing how the ratings are awarded.
9. When it comes to GHG / Environment rating, RightShip just gathered the initial data (provided from our end) from the shipyard during the building and give the rating basis the static information. However going further ahead in the years to come they downgraded the vessel which were given A+ rating in past to B or C without even advise why they did same. We can understand that there are new technology evolving and basis that they are downgrading the existing vessel, but there no transparency on how they are giving (Upgrading / Downgrading) the rating for the existing vessels. i.e. lack of transparency.
10. The GHG Rating system is dynamic in nature. As new more efficient vessels come into a peer group or make modifications that improve their efficiency, relative efficiency and GHG ratings may change. Thereby this is a dynamic market driven metric where the average is always improving with the drive towards a greener world fleet.
11. Two webinars had been arranged in the run up to the GHG 2.0 release, each attended by around 300 individuals. There was a broader announcement in media and on the RightShip’s Platform on the impending change. The webinars were technical in nature and went into details of the calculations. A link to the same is still available on RightStore for free access. The methodology technical document and related FAQs are also provided for free download.
12. Additionally, the individual RightShip inspector(s) understanding about the safety and inspection protocol is very shallow, when compared to OCIMF inspectors. It has been seen in few of the instances that we have come across that the RightShip inspectors are creating an unnecessary / unpleasant atmosphere on the bulk carriers with long list just to prove that they are doing good to the industry by tell that Bulk carriers / Containers vessels are very unsafe.
13. We would need further information/specifics on the issues being reported to be able to comment further on remarks on Inspector understanding of safety and inspection protocols.
14. However we can share the following:
* We maintain minimum qualifications to sit the RightShip training program. Each Inspector is trained, undergoes both written and oral exams, and must maintain their accreditation to quality to undertake RISQ Inspections. Inspectors are also subject to audits to verify that performance is consistent. Just over 50% of inspectors are also SIRE qualified.
* After every inspection we provide a survey requesting feedback which is assessed should there be any issues raised on content or conduct, plus we also engage with Managers on questions, suggestions and clarifications.
* We invite the Manager raising concerns to contact us at risq@rightship.com.

We tend to disagree here because a company which is having the same SMS system for all type of vessels, how this can be right.

1. The RightShip system is good for handling the submission, but when we are submitting the PSC data already on OCIMF Website, what is the need for them to collect same from the operators every time, thereby duplicating the work for the technical operators.”
* We always leverage data available to us via other sources such as OCIMF, but also have our own processes in place regards incident and PSC review that must be followed. Often this requires the original documentation to be submitted to us alongside an investigation report detailing the corrective and preventative actions so we can provide a more complete safety recommendation to our customers.
1. “We know that RightShip is trying to create a “market” for themselves within RoRo/PCTC segment…
* Unclear the basis for this comment as there has been no activity within RightShip towards this segment.

The intention of the system is good, enabling various stakeholders to have a “safety vetting” of the various vessels, but with many limitations imposed to the end user. We know that we also have frequent update meetings with RightShip directly from Global HSEQ, where we also give various inputs for improvement to their systems. Currently it is not much transparent, as the calculations done through their algorithms are unknown, and that any forecast currently is limited to DOC-subscore forecast hidden behind additional fee/charges…. No pro-active approach for safety subscore on vessels etc.

1. Also some concerns raised where too much availability of environmental data could potentially lead to disclosure of financial sensitive information, hence none of the vessels with verified environmental data in their systems either. {X} gave inputs on that topic, and {Y} gave clear instructions to SMs for not to share this type of information with third parties without prior approval”
* Becoming GHG Verified via an Environmental Submission in the RightShip Platform is an optional step. Not doing so will still grant your vessel a GHG Rating using publicly available data points for the calculation. Those choosing to become verified by submitting additional information do so voluntarily and are clearly advised during the submission process how the data will be used by RightShip. If they have any concerns with those terms of use then they can choose not to proceed with a submission.