



August 18, 2022

RE: Ocean Shipping Reform Act (OSRA) 2022, Review of Detention & Demurrage Billing

Dear Valued Customer,

Effective June 16, 2022, the U.S Congress approved revisions to several provisions of OSRA, which President Biden immediately signed into effect. In all, revisions were made to almost 20 different regulations within OSRA, with effective dates for the revisions ranging from immediate effect to up to 3 years. An important item with immediate effect were those surrounding minimum data components necessary for Detention, and Demurrage invoices to be considered compliant. If not compliant, the invoices would be excused from payment.

DB Schenker is taking immediate steps to assure that any Detention/Demurrage invoices generated by Vessel Operating Carriers (VOC'S) in association with shipments when DB Schenker is acting as an NVOCC, are compliant with new OSRA Regulations. Specifically, some of the actions to be taken are as follows:

1. DB Schenker will expire US Demurrage and Detention tariff, effective September 1, 2022.
2. Assuring that VOC D&D invoices include the 13 data elements that are referenced in the new OSRA 2022 Regulations. (See data elements www.NVOCC.com)
3. When DB Schenker determines that the data elements are not compliant, it shall return non-compliant invoices to the VOC to give them the opportunity to make any necessary adjustments to have invoices become compliant with the new Regulations.
4. Should a VOC fail to make necessary corrections to non-Compliant invoices within a reasonable timeframe, DB Schenker has the option of initiating a formal Charge Complaint with the Federal Maritime Commission to advise them of any non-compliances for their investigation.
5. DB Schenker shall pass through all demurrage and detention invoices to shipper, whether or not it has provided Notice to VOC that the invoices are deficient. DB Schenker shall inform Shipper when it has provided Notice of non-compliance to VOC.

Once again, DB Schenker shall be following the developments of NPRM, and finally ANPRM actions of the FMC, and will provide any additional advisories to its Customers that might be required on this matter.

Should you require any further information or clarification, please do not hesitate to contact your account manager or customer service representative.

Best Regards,

DB Schenker