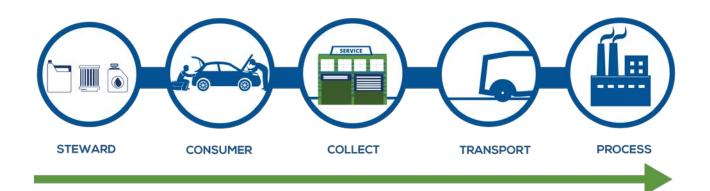


Guidebook for Transporters & Processors



This Edition: April 2017

This manual describes the registration, approval process & incentive program for Transporters and Processors of Automotive Materials in Ontario



RELATED USER GUIDES & OTHER INFORMATION

Automotive Materials Stewardship Service Provider Website http://www.automotivematerialsstewardship.ca/serviceproviders

Information on the Municipal Program http://www.automotivematerialsstewardship.ca/municipal

Information on Automotive Incentive Program (AIP) http://www.automotivematerialsstewardship.ca/aip

Guidebooks, Standards and other Resources http://www.automotivematerialsstewardship.ca/documents Need help, have comments or feedback?

Please contact Automotive Materials Stewardship at: <u>serviceprovider@autostewardship.ca</u> or 1-888-575-4870

ABOUT AUTOMOTIVE MATERIALS STEWARDSHIP

Automotive Materials Stewardship (AMS) was established in early 2016 to represent the interests of businesses in the automotive sector to create environmentally sustainable ways for consumers to recycle used automotive products.

As a non-profit organization, AMS focuses on the recycling of:

- Oil filters
- Empty oil containers
- Antifreeze and antifreeze containers

Consumers are encouraged to bring these materials to collection sites, which may be operated commercially or by municipalities, so that the materials and their packaging can be recycled or disposed of safely.

As businesses become increasingly aware of their impact on the environment, so does their desire to take a leading role in producing less waste and ensuring what is produced is recycled and re-purposed.

Organizations like AMS are funded by businesses to collectively act on their behalf to help consumers with greater recycling choices.



LIST OF DEFINITIONS

Automotive Incentive Program (AIP) – The program which manages the recycling or safe disposal of Automotive Materials. Transporters and processors that are part of AIP pick-up, transfer or process these materials once collected from the collection network, made up of individual automotive material collection sites across multiple channels.

Automotive Materials – Are the waste materials listed below that were designated as Phase 1 in the Minister's program request letter to Waste Diversion Ontario received on October 25, 2010. These may be further defined by the Minister from time to time:

- Antifreeze, and the containers in which it is contained*
- Containers that have a capacity of 30 litres or less and that were manufactured and used for the purpose of containing lubricating oil*
- Oil filters after they have been used for their intended purpose

*For reporting purposes, used oil and antifreeze containers will be combined into a single category named "Automotive Plastics".

Bill of Lading (BOL) – A form used to document the collection and transportation of Automotive Materials. The BOL shows the date of collection/transportation, address of originating site, address of drop-off site, weights and types of materials collected. These hard-copy forms are used to verify your submissions to AMS for payment and for material tracking purposes.

Processing Incentive (PI) – A payment model that has been established to enhance the infrastructure for plastic recycling, and thus are provided to Processors for used oil containers and used antifreeze containers (Automotive Plastics). *Note: A Processor Incentive is not provided for the handling of oil filters and antifreeze*.

Transportation Incentive (TI) – A payment model that has been established to achieve collection / transportation objectives set by AMS and is provided to "Approved Transporters" for the three Automotive Materials.



ROLES & RESPONSIBILITIES

Automotive Material Collection Sites may be registered with Automotive Materials Stewardship if they are large commercial or retail operations, or operated by a municipality. However, Automotive Material collection sites are not required to register in advance with AMS. This is due to the number of smaller, privately-owned commercial sites (e.g. service stations and garages) that exist in Ontario. Collection sites are identified by Transporters on their reports to AMS. Collection sites are responsible for establishing service arrangements with approved Transporters.

Transporters transport Automotive Materials from collection sites to an approved Processor. Transporters must be approved by AMS in order to be eligible to receive the Transporter Incentive.

Transporters are responsible for establishing service arrangements with Automotive Material Collection Sites and approved Processors. Transporters are also responsible for ensuring that Automotive Material Collection Sites agree in writing to adhering to the AMS <u>Collection Sites Standards</u>.

Processors accept Automotive Materials for the purpose of recycling or reprocessing those materials; or to ensure they are safely disposed of. Processors must be approved by AMS in order to be eligible to receive the Processor Incentive for used oil containers and used antifreeze containers – "Automotive Plastics." No Processor Incentive is provided for the handling of used oil filters or antifreeze. Processors are responsible for establish contracts or agreements with approved Transporters.

Eligibility Requirements

Any organization that deals with the transportation or processing of Automotive Materials in the province of Ontario – and meets AMS's requirements – is eligible.

All Transporters and Processors that wish to handle materials under the Automotive Incentive Program must:

- Be registered and approved by AMS; and
- Sign a services agreement with AMS and adhere to all <u>AMS Service Provider Standards</u>.

All Transporters and Processors located within the boundaries of Ontario are subject to, and must comply with, all Ontario legislative and regulatory requirements, and with AMS's Standards.

Transporters and Processors located outside of Ontario are subject to, and must comply with, all applicable provincial or state legislative and regulatory requirements. If you are a Transporter delivering Automotive Materials to Processors located outside of Ontario, you must also ensure these Processors are registered with AMS.



REGISTRATION

Creating an Online Profile

To become an approved AMS Transporter or Processor, an online registration must be completed.

Visit AMS's registration and reporting WeRecycle Portal:

- Click on "New Registrant"
- Create a User ID and provide an e-mail address

You will receive an e-mail with a temporary password and instructions for logging on to the portal. The portal will then guide you through the registration process. The following information will be requested:

- Company name
- Contact information for a primary and secondary contact as well as an accounting contact
- Whether you would like to offer Transportation or Processing services or both
- Types of material you will be transporting and/or processing

You will receive an e-mail acknowledging receipt of your application and will also be supplied with a preliminary vendor number. Automotive Materials Stewardship will connect with your primary contact.

After the initial contact and once it is determined there is a need for the services being offered, you will be asked to complete the application process and sign a services agreement.

After the initial contact and once it is determined there is a need for the services being offered, you will be asked to complete the application process and sign a services agreement.

Automotive Materials Services recommends that you designate an individual in your organization to be a "primary contact" between your company and Automotive Materials Services. The primary contact must have the authority and ability to:

- Legally bind or legally represent your organization;
- Enter into contracts on behalf of your organization;
- Gather information internally and reports for work performed as an Automotive Materials processor or transporter.



APPLICATION PROCESS

Overview

As part of the application process, you will need to supply the following information:

For Transporters

- Number of trucks servicing the program;
- Capacity of trucks servicing the program;
- Type of transportation containers you will be using; and
- Transportation zone(s) in which you wish to operate.

For Processors

- On-site storage capacity;
- Daily processing capacity;
- Description of planned recycling process and disposition reporting; and
- End markets planned for products.

Both Transporters and Processors must provide proof of:

- Business license;
- General Third Party Public Liability Insurance (Automotive Materials Stewardship must be listed on the policy as an additional insured party); and
- Ministry of the Environment issued "Environment Compliance Approval" (ECA), previously referred to as "Certificate of Approval" (C of A), or equivalent, where applicable.

Environmental Audit Requirements

To become an approved Transporter or Processor, companies must undergo an environmental audit of their operations at their own expense, and submit a letter of compliance that confirms this audit has been performed. The audit ensures that any approved Automotive Materials Transporter, Processor or Sub-Processor is in compliance with a detailed set of requirements.

The audit takes the form of an <u>Audit Checklist</u>, and focuses on regulatory compliance and operating standards and procedures, with additional material-specific requirements.

- New Transporters and Processors must perform the audit before they are approved
- *Existing* Transporters and Processors must perform the audit by January 31st of each calendar year in order to remain an approved Automotive Materials Stewardship service provider

Existing and prospective service providers have the option of conducting the audit in one of two ways:

- 1) Conducting the environmental audit internally; or
- 2) Engaging external third party auditors.

Automotive Materials Stewardship does not have a preference of whether the audit is conducted internally or externally, and the chosen method will have no bearing on the outcome of the approval process.



Letter of Compliance

After the audit is performed, Transporters and Processors must prepare and submit a Letter of Compliance that contains the following elements:

- Certifies that the company meets Automotive Materials Stewardship' terms and conditions, including applicable <u>Service</u> <u>Provider Standards</u>
- Indicates that the company meets all applicable legislation
- Outlines the methodology used to perform the environmental audit and assess compliance
- Signed by an officer of the company and may be co-signed by the company's environmental compliance officer

A sample of the letter of compliance is shown on page 12.

Please email your letter to <u>operations@autostewardship.ca</u> with the subject line, **Service Provider - Compliance Letter**, or send by mail to:

Automotive Materials Stewardship ATTN: Operations Officer 1 St. Clair Ave. W., 7th Floor Toronto, Ontario M4V 1K6

Review & Approval

Upon submission of all requested documentation, Automotive Materials Stewardship will confirm receipt within five (5) business days. Following this, your company's information will be reviewed and a site visit and meeting will be scheduled to complete the review process. After the site visit and meeting you will be notified of the approval decision within five (5) business days.

Automotive Materials Stewardship maintains a <u>list of registered and approved Transporters and Processors</u>. This list is updated regularly, and posted on Automotive Materials Stewardship's website so that collectors of Automotive Materials may contact you for business purposes.

Program Confidentiality

Under the Automotive Waste Materials Program, information with respect to specific generators and/or collection facilities, Transporters and Processors will be kept confidential. The volume of Automotive Materials collected and diverted and the financial reimbursement to individual Transporters and Processors will not be disclosed except as may be required by law. Aggregated results will be reported.

Only the company name and contact information will be shared online for collectors of Automotive Materials to view on our site.



AUTOMOTIVE INCENTIVE PROGRAM

Overview

Approved Transporters of Automotive Materials may establish a transportation agreement with any Automotive Material Collection Sites (e.g. a municipal depot or an automotive commercial site); provided that the collector agrees to the Transporter, in writing, to abide by AMS's Collection Site Standards. Approved Transporters may also establish a processing agreement with any Automotive Materials Processor approved by AMS.

In other words, contracts to transport and process Automotive Materials from collection sites are negotiated independently by service providers and are not part of Automotive Materials Stewardship's incentive program model.

It is important to note that events run by municipalities to collect Automotive Materials are not considered Automotive Material Collection Sites and are not part of AIP. For more information on Municipal Events, please visit the <u>AMS website</u>.

To encourage participation in the program, and to stimulate recovery of Automotive Materials, AMS provides financial incentives to Transporters and Processors of these materials.

- **Transportation Incentives (TI)** are in place to achieve collection targets set by AMS, and are provided to the three automotive materials: used oil filters, used antifreeze, and used antifreeze containers and oil containers or "Automotive Plastics".
- **Processing Incentives (PI)** are in place where necessary to ensure the infrastructure for recycling, and currently are provided to Processors for used antifreeze containers and oil containers or "Automotive Plastics" only.

Eligible transportation and processing materials:

Material	TI-Eligible?	PI-Eligible?
Used Antifreeze	Y	Ν
Used Oil Filters (including "Crushed")	Y	Ν
Automotive Plastics (used oil & antifreeze containers, including "Shredded")	Y	Y

For the Automotive Materials to be eligible for a TI/PI they must be packed in accordance with AMS packing standards (e.g. commingling of plastic containers with oil filters and/or antifreeze is not acceptable)

Automotive Waste Materials Program Zones

AMS has established nine transportation zones within Ontario. The AMS Zone Map indicates the location of the nine transportation zones. Transporters will be paid the corresponding zone-based TI upon delivery of Automotive Materials to any Processor registered with AMS. The transportation zones ensure that Transporters are reimbursed for costs associated with transportation of Automotive Materials. The zones TI rates have been set to offset the higher costs associated with the transportation of materials to and from remote and less-populated areas of the province.

Transporters are permitted to consolidate materials to allow for more efficient business practice; however, the TI rates paid are based on the zone in which the originating collection site is located.

The full Zone Map can be found on page 13. More detailed Zone Maps can be found on the AMS website.



Transportation Incentive

Under the AIP, transportation incentives are paid based on three factors: 1) the geographic zone in which materials are being transported, 2) the type of material collected, and 3) the current price of fuel.

- The transportation zones are based on primary and secondary road systems, municipal boundaries, and the volume of Automotive Materials available for collection by zone. In addition, each zone is subdivided into urban and rural areas. A rural location is defined as any postal code where the second character is a "0" (zero), a standard governed by Canada Post. Since rural locations are usually further from primary road systems, most will have a higher incentive rate applied.
- 2) Within each zone, four levels of Transportation Incentives are available depending on the type of material that is being handled. Those materials are Automotive Plastics, Oil Filters, Antifreeze reported in Kg's and Antifreeze reported in Litres.

These first two factors help determine the "base incentive rate" that will be paid.

3) Transporters will also receive a fuel surcharge applied to the base incentive rate based on current fuel prices. Due to constant fluctuation of fuel prices, the industry-recognized Freight Carriers Association of Canada's index is used. The price is updated on a weekly basis and the amount is incorporated into the claim submission based on the date the service occurred. The calculation is as follows:

Fuel Surcharge = (Base Transportation Incentive Rate X Reported Quantity) X LTL Fuel Surcharge Rate as of the Service Date

Transportation "Base" Incentive Rates by Material & Zone (Rural & Urban)

Material Description	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9
Antifreeze (\$/L)	\$0.1994	\$0.3229	\$0.3039	\$0.3134	\$0.3324	\$0.3799	\$0.4748	\$0.2944	\$0.2754
Antifreeze (\$/Kg)	\$0.1855	\$0.3004	\$0.2827	\$0.2915	\$0.3092	\$0.3534	\$0.4417	\$0.2739	\$0.2562
Used Oil Filters – including 'crushed'	\$0.5300	\$0.7067	\$0.6890	\$0.6802	\$0.6625	\$0.8834	\$1.0512	\$0.6360	\$0.6007
Automotive Plastics – used oil & antifreeze containers including 'shredded' (\$/Kg)	\$1.1661	\$1.4134	\$1.3693	\$1.3693	\$1.3693	\$1.5459	\$1.6784	\$1.3693	\$1.4134

RURAL Transportation Zones

URBAN Transportation Zones

Material Description	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8	Zone 9
Antifreeze (\$/L)	\$0.1994	\$0.2659	\$0.2469	\$0.2564	\$0.2754	\$0.3324	\$0.3989	\$0.2374	\$0.2754
Antifreeze (\$/Kg)	\$0.1855	\$0.2473	\$0.2297	\$0.2385	\$0.2562	\$0.3092	\$0.3710	\$0.2208	\$0.2562
Used Oil Filters – including 'crushed'	\$0.5300	\$0.6095	\$0.5742	\$0.5742	\$0.5565	\$0.7951	\$0.8746	\$0.5477	\$0.6007
Automotive Plastics – used oil & antifreeze containers including 'shredded' (\$/Kg)	\$1.1661	\$1.2809	\$1.2191	\$1.2367	\$1.2367	\$1.4134	\$1.5459	\$1.2367	\$1.4134

*Please note, zone 1 and 9 have the same urban and rural rates



NOTE: In case of any discrepancy or inconsistency between the **Transportation Incentive Rates** published in this guidebook and those published on the AMS website, the AMS website will prevail.

EXAMPLE: Transporter A submits a claim to Automotive Materials Stewardship for 100 kilograms of Oil Filters picked up from Urban Zone 3.

Material Description	Reported Quantity	Units of Measure	Net Price per Kg	Net Amount
Oil Filters	100 Kg \$0.5742/k		\$0.5742/Kg	\$57.42
A Fuel Surcharge of 15.19	\$8.67			
TOTAL INCENTIVE	\$66.09			

*The Calculated Cost increase as of November 19, 2012 was 15.1% as per the Freight Carriers Association of Canada

Cross Border Movement of Automotive Materials

Automotive Materials that were not supplied into Ontario for use by a residential or ICI consumer, including Automotive Materials that have been transported into the province of Ontario following disposal by the original residential or ICI consumer are ineligible for the Automotive Incentive Program. *Reporting out of province Automotive Materials will be subject to severe monetary penalties and removal from the program.*

It is not AMS's intention to restrict the movement of Automotive Materials to approved processing locations which, from an economic perspective, make good business sense. Therefore, AMS will not restrict Transporters from transporting Automotive Materials to approved processing facilities in other North American jurisdictions or abroad.

Transporters wishing to use an out-of-province Processor must ensure that the Processor is approved with AMS. The out-ofprovince Processor must register with AMS by following steps as described on page 5 and provide a Letter of Compliance verifying that all requirements of their governing jurisdiction have been met and they are subject to a site audit prior to approval.

Processing Incentive Rate

Only used antifreeze containers and used oil containers are eligible for a processing incentive:

Material Description	All Zones
Antifreeze (\$/L)	\$0.00
Antifreeze (\$/Kg)	\$0.00
Used Oil Filters – including 'crushed'	\$0.00
Automotive Plastics – used oil & antifreeze containers including 'shredded' (\$/Kg)	\$0.39

NOTE: In case of any discrepancy or inconsistency between the **Processing Incentive Rate** published in this guidebook and those published on the AMS website, the AMS website will prevail.



REPORTING TO AUTOMOTIVE MATERIALS STEWARDSHIP

Transporters and Processors of Automotive Materials must report to AMS the quantities they manage, after which they will receive payment from AMS based on the incentive rates effective on the date service was delivered to AMS. Payments are made within thirty (30) days of verification.

Transporters (drivers) must complete a Bill of Lading (BOL), manifest or other form of document that enables verification of pickups and quantities. Approved documentation must be used each time automotive materials are transported from a collection site to an AMS approved Processor or interim bulking facility or from a facility to a downstream Processor.

Reports are submitted online for payment of transportation and processing incentives via the <u>WeRecycle portal</u>. Submissions must be accompanied by the BOLs number associated with the submission (Transporters) or other tracking or "control" documents (Processors), or such documents must be made available upon request to validate submissions. The use of "other tracking or control documents" must be preapproved by AMS to ensure they satisfy reporting and verification requirements.

Transporters and Processors must report their activities no less than every two (2) weeks, but are encouraged to report as frequently as possible. The reporting process and submission instructions can be found in the <u>Reporting Guide for Transporters &</u> <u>Processors of Automotive Materials</u>.



REFERENCE MATERIALS

Sample Letter of Compliance

A word template for this letter is available on the **AMS website**.

Company Logo & Letterhead

MM/DD/YYYY

Automotive Materials Stewardship 1 St. Clair Ave. W., 7th Floor Toronto, Ontario M4V 1K6

RE: Compliance with Environmental Standards

To Whom It May Concern:

[Company X] certifies that it meets Automotive Materials Stewardship's operating policies and protocols set out in the Automotive Materials Service Provider Standards (as outlined in the Audit Checklist for Transporters and Processors).

[Company X] additionally certifies that it is in compliance with all applicable federal and provincial environmental regulations.

Company representatives conducted a site examination of the facility at [address] on [date]. The site examination activities included, [for example, an opening meeting, site tour, observations, interviews, documentation review and a closing meeting]. Findings and the supporting evidence from the onsite activities were documented on the Automotive Materials Audit checklist and reviewed by [x].

Sincerely

Environmental Compliance Officer

Officer of the Company



Automotive Program Zone Map

More detailed maps can be found on the <u>AMS website</u>.

Wawa Michipicote Sultan Lake Superior Lake Superior Metric Carles Sultan
Munising Luce 28 Chipping Chemical Chemical Control Co
Manistique St. Ignole
Leiand, Gaydrol Mathematical Albana Coner and
Lake City control losoft Port Elop County Co
And
Alloger Barry Exercised Contraction Contra
Cress Brand Ann Arbor Add Essex County Lake Frie Ashtabula PA Part UNITED States Delaware Kingston County County Ashtabula PA Part UNITED STATES
INDIANA Aubur Binder Under Cheveland Cavor Cleveland Cavor Cavor Cavor Cavor Cleveland Cavor C

TI Zone 1 • City of Toronto • Region of Durham • Region of Halton • Region of Peel • Region of York	TI Zone 2 County of Bruce County of Dufferin County of Grey County of Simcoe District of Muskoka District of Parry Sound	TI Zone 3 • County of Haldimand • County of Norfolk • County of Northumberland • County of Peterborough • County of Victoria (Kawartha Lakes) • Lower Portion, District of Nipissing (South of Algonquin Park)
 County of Frontenac County of Hastings County of Leeds & Grenvile County of Lennox & Addington County of Prince Edward 	TI Zone 5 • County of Lanark • County of Prescott & Russell • County of Renfrew • County of Stormont, Dundas & Glengarry • Region of Ottawa-Carleton (City of Ottawa) TI Zone 8 • County of Brant • County of Brant • County of Brant • County of Haliburton • County of Huron • County of Middlesex • County of Yofrod • County of Verlington • Region of Niagara • Region of Hamilton-Wentworth (City of Hamilton) • Region of Waterloo	 TI Zone 6 Lower Portion, District of Sudbury (South of Hwy 17) Upper Portion, District of Nipissing (Algonquin Park & North) District of Manitoulin Region of Sudbury TI Zone 9 County of Essex County of Kent County of Lambton



Automotive Materials

Definitions	Examples	Exclusions
Oil Filters – Means filters produced and/or arriving into the province, and which are for sale, directly or as part of a product in Ontario	 Spin-on or element style filters that are used in hydraulic transmission or internal combustion engine applications Diesel fuel filters Household furnace fuel filters Coolant filters Storage tank diesel fuel filters Plastic & paper element style filters Diesel fuel filters used at retail and commercial pump islands Sump type automatic transmission filters 	 Gasoline fuel filters Air filters Household furnace air filters Sock-type filters
Oil Containers – Means containers that have a capacity of 30 litres or less and that were manufactured and used for the purpose of containing lubricating oil For this purpose, "lubricating oil" means petroleum-derived or synthetic crankcase oil, engine oil, hydraulic fluid, transmission fluid, gear oil, heat transfer fluid, or other oil or fluid used lubricating machinery or equipment	Containers that contained: Any crankcase or engine oil Hydraulic fluid Polyol ester fluids Circulating oil or turbine oil Paper machine oil Transmission fluid Power steering fluid Gear oil Vegetable oil for lubrication Re-refined oil Electrical insulating oil Refrigeration system oil Compressor oil Mineral heat transfer fluid Marine engine oil for vessels operating domestically Metal working oil Form release oil Textile oil Chain oil Rock drill oil 2-cycle engine oil Gasoline / 2-cycle engine oil mixes Saw guide oil Drawing, stamping and shaping oil Process oil De-dusting oil Machine tool and slide way lubricant Natural gas compressor oil Conveyor lube Dripless lube Quenching oil Pneumatic system oil Rustproof oil Pneumatic system oil	 Containers that contained: Ethylene glycol heat transfer fluid Propylene glycol heat transfer fluid Silicone heat transfer fluid Synthetic aromatic hydrocarbon heat transfer fluid Glycol-based heat transfer fluid Water glycol hydraulic fluid Phosphate ester hydraulic fluid Hydraulic oil dye Polyglycol synthetic compressor oil Base oil, including re-refined base oil Grease Oil additive Oil treatment Diesel fuel treatment Cleaning/flushing fluids for motors/equipment Winter start fluid Hydraulic jack oil 3-in-1 household oil Aerosol propelled lubricant Gun oil Kerosene Urethane coating Sewing machine oil Cooking oil Windshield washer fluid Emulsified oil
Antifreeze – Means ethylene or propylene glycol used or intended for use as a vehicle engine coolant	 Includes premixed (water diluted) and concentrated product Antifreeze Supplied in all container sizes including Bulk and Packaged Bulk is Supplied in containers greater than 30 litres (e.g. delivered using a tanker trailer) Packaged is Supplied in containers equal to or less than 30 litres 	 Factory fill initial charge of vehicle antifreeze Plumbing antifreeze Vehicle windshield antifreeze Product marketed as industrial heat transfer fluid Fuel (gasoline & diesel) antifreeze Lock de-icer Air brake antifreeze Antifreeze which does not contain ethylene or propylene glycol Antifreeze containers greater than 30 litres



Approved Transportation Container Types

Automotive Materials **<u>must be</u>** collected and transported in AMS approved containers, as follows:

Material Description	Container Type	
	Bulk Bin	
	60 litre steel drum	
	115 litre steel drum	
Oil Filters – including "crushed"	205 litre steel drum	
	240 litre plastic tote	
	360 litre plastic tote	
	1,100 litre plastic tote	
	Lab packs containing 3.78 litre jugs	
Antifreeze	Bulk litres (Vac truck, tanker)	
Anthreeze	205 litre steel drum	
	1,100 litre plastic tote	
	Plastic bag	
	20 litre pail (report as number of pails)	
Automotive Plastics – including "shredded"	205 litre steel drum	
	240 litre plastic tote	
	360 litre plastic tote	
	1,100 litre plastic tote	

Additional transportation container types may be approved subject to AMS's sole discretion.