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April 29, 2026

Mayor Mike Little
 Mayor of the District of North Vancouver
 355 West Queens Road
 North Vancouver, BC V7N 4N5

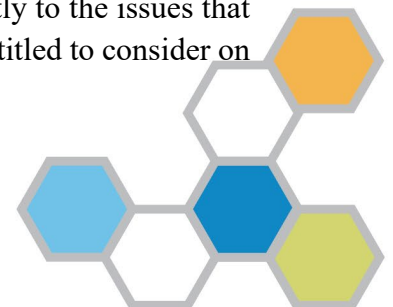
Dear Mayor Little:

RE: Request for Reconsideration under s. 131 of the Community Charter – Rezoning Bylaw Application (Chemtrade North Vancouver Facility)

We write on behalf of Chemtrade Electrochem Inc. (“**Chemtrade**”) to respectfully request that the Mayor or Council initiate a reconsideration, pursuant to section 131 of the *Community Charter* or section 26 of the District of North Vancouver’s *Council Procedure Bylaw*, of Council’s decision of April 13, 2026 to abandon at first reading the proposed site-specific zoning bylaw amendment application (the “**Application**”), relating to Chemtrade’s North Vancouver chlor-alkali facility (the “**Facility**”). Chemtrade acknowledges and appreciates the time, care, and consideration Council devoted to our application. At the April 13, 2026 meeting, members of Council identified specific concerns regarding the perpetual nature of the proposed approval and the importance of ensuring that safety performance at the Facility continues to advance in-step with evolving best practices and technology.

In direct response to those concerns, Chemtrade has developed a framework (the “**Framework**”), attached as *Appendix A*. The Framework replaces the prior approach with a conditional, time-limited, and legally enforceable structure designed to give the District comfort that the Facility’s Chlorine Operations (as defined herein) are designed and constructed in compliance with applicable safety standards and, once operational, are operated in a manner consistent with such standards. The Framework is intended to ensure any approval granted is time-limited, subject to enforceable conditions, and expressly contingent on continued compliance and enforcement over time.

Chemtrade respectfully submits that the Framework constitutes both new information and a substantively amended approach, introducing material features that were not before Council on April 13, 2026. In particular, the Framework replaces the prior open-ended proposal with a time-limited, conditional structure that includes scheduled review milestones, enforceable obligations, and a defined expiry date. In our opinion, these features go directly to the issues that informed Council’s earlier decision and are therefore of a nature Council is entitled to consider on





a reconsideration initiated under section 131 of the *Community Charter* or section 26 of the *Council Procedure Bylaw*.

Summary of Proposed Revised Conditions

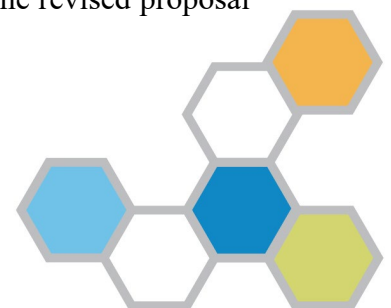
Chemtrade’s proposed Framework includes the following core elements:

- Registration of a restrictive covenant, under section 219 of the *Land Title Act* (the “**Section 219 Covenant**”), stipulating, among other things, a time-limit on the proposed permitted industrial use for Chlorine Operations that is coterminous with the end of the term of Chemtrade’s lease with the Vancouver Fraser Port Authority (the “**Port Lease**”), such that permission to receive, manufacture, store, and distribute liquid chlorine (“**Chlorine Operations**”) would expire no later than the end of the term of the Port Lease, unless Council determines to extend the approval following a future review.
- The Section 219 Covenant will also contain enforceable conditions governing continued operations, reporting, and compliance of Chlorine Operations at the Facility.
- Establishment of a post-upgrade baseline Quantitative Risk Assessment (QRA), with a mandatory QRA update, with review by the District.
- A scheduled independent Best Achievable Technology (BAT) review at a defined mid-term milestone, carried out by a qualified third-party engineering firm selected by Chemtrade.

Taken together, this revised, evidence-based framework is intended to ensure that any approval granted is neither perpetual nor unconditional, that it provides Council and future Councils with meaningful visibility, and that requires that the Chlorine Operations be reassessed at specified milestone intervals.

Chemtrade is committed to working collaboratively with District staff and Council to refine covenant language, reporting protocols, and implementation mechanics to ensure that the Framework is clear, robust, and practically enforceable. An indicative timeline setting out the proposed conditional Framework is included in *Appendix A* for Council’s convenience.

For these reasons, Chemtrade respectfully requests that Council exercise its authority to initiate the reconsideration of the Application within the required 30 day timeframe (before May 12, 2026) or take such other procedural steps as Council considers appropriate, so that the revised proposal





may be considered on its merits in accordance with the statutory framework governing Council decision-making.

We would welcome the opportunity to appear before Mayor or Council or otherwise respond to any questions that may assist in that process.

Respectfully submitted,

Chemtrade Electrochem Inc.

Per:

alan robinson

Alan Robinson

Group Vice President, Commercial

cc: Mike Fox, Chief Administrative Officer – District of North Vancouver



APPENDIX A

Indicative Conditional Approval Framework and Timeline

This Appendix is provided for information purposes to assist Council in understanding the structure, sequencing, and oversight mechanisms contemplated by Chemtrade’s revised, conditional, and time-limited approval framework for the Facility. The timelines below are indicative and are subject to refinement by way of a section 219 covenant in form and substance acceptable to the District (the “**Section 219 Covenant**”).

1. Initial Approval and Covenant Registration

- Council approval of the site-specific zoning bylaw amendment, together with authorization to enter into the Section 219 Covenant setting out conditions governing continued Chlorine Operations at the Facility, generally as set out in this Appendix A.
- Registration of the restrictive covenant on title, including: (i) an express end date for Chlorine Operations at the Facility that is coterminous with the end of the term of the Port Lease, expected to be the earlier of December 31st, 2046, or termination of the Port Lease (the “**Chlorine Operations End Date**”); and (ii) review and oversight opportunities for the District at meaningful milestones throughout the term of the Port Lease.

Indicative timing: 2026

2. Completion of Committed Safety Upgrades

- As a precondition to adoption of the zoning amendment bylaw, Chemtrade will enter into the Section 219 Covenant to, among other things, secure performance of and compliance with all conditions, limitations, and requirements set out in the BakerRisk facility siting study/quantitative risk assessment (“**QRA**”) and Risktec peer review relating to construction of the proposed project and to Chlorine Operations, including all safety upgrades.
- As a precondition to issuance of any building permit for Chemtrade’s proposed project, Chemtrade will obtain and provide to the District a detailed validation quantitative risk assessment prepared by BakerRisk based on the detailed project plans and specifications, confirming that the Facility (including Chlorine Operations) as designed meets current standards in accordance with the Process Safety Management Division (“**MIACC**”) or then-comparable and recognized industry land use planning guidelines (the “**MIACC Standards**”).



- Chemtrade will provide to the District, on a confidential basis, a security vulnerability assessment prepared by an independent qualified professional in relation to the project. The assessment shall be clearly marked as confidential and shall be used by the District solely for the purpose of evaluating the building permit application. The District shall not disclose the assessment and shall treat it as confidential information, including as information the disclosure of which could reasonably be expected to compromise public safety or security.

Indicative timing: Estimated 2027

3. Establishment of Baseline Quantitative Risk Assessment (QRA)

- Following completion of the safety upgrades, and prior to issuance of any occupancy permit or final inspection in relation to the Facility, Chemtrade will provide a further QRA from BakerRisk (the “**Baseline QRA**”) confirming that the Facility (including Chlorine Operations) as constructed meets the MIACC Standards.
- The risk contours in the Baseline QRA will establish the approved baseline for ongoing Chlorine Operations under the covenant.
- The Baseline QRA will form a reference point for future compliance assessments.

Indicative timing: Concurrent with completion of safety upgrade project (est. end of 2030)

4. Periodic QRA

- Chemtrade will engage BakerRisk or another qualified independent professional engineering firm (the “**Independent Risk Manager**”) to undertake an updated QRA 8 years after the establishment of the Baseline QRA.
- The 8-year QRA must recommend measures to address Baseline QRA compliance issues, if any, with the Facility and its operation, including Chlorine Operations.
- Chemtrade will then again engage the Independent Risk Manager to undertake a further updated QRA which must be provided to Chemtrade on the date that is 10 years after the establishment of the Baseline QRA. The 10-year QRA must establish that the Facility and its operation, including Chlorine Operations, continue to meet or exceed the Baseline QRA. The 10-year QRA must be provided to the District as soon as it is provided by the Independent Risk Manager to Chemtrade.





- If the 10-year QRA meeting the above requirements is not provided to the District within the time stipulated then Chlorine Operations at the Facility must cease until such time as it is provided.
- In preparing each of the QRA's required under this framework, the Independent Risk Manager must employ applicable then-current industry standard methodologies and must ensure that each of the QRA's satisfies reasonable criteria and requirements as will be set out in the Section 219 Covenant.

Indicative timing: Approximately 8 and 10 years after the Baseline QRA established, respectively (est. end of 2038 and 42040)

5. Best Achievable Technology (BAT) Review

- At a defined mid-term milestone following bylaw approval, Chemtrade engages an independent engineering firm to assess whether the Facility continues to reflect Best Achievable Technology for risk mitigation and operational safety.
- The independent reviewer is selected by Chemtrade, subject to the District's approval not to be unreasonably withheld.
- The resulting BAT report is provided to the District and serves as a resource to assist in Council's consideration, in its discretion, of whether or not to extend the Chlorine Operations End Date.

Indicative timing: Approximately 15 years after bylaw approval

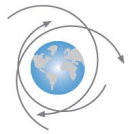
6. End-of-Term Review and Expiry

The Section 219 Covenant will stipulate that the Chlorine Operations must terminate on the Chlorine Operations End Date, unless Council in its sole discretion after receipt of the BAT report and on or before the Chlorine Operations End Date agrees, in accordance with all applicable statutory processes, to an extension of the Chlorine Operations End Date.

Indicative timing: The earlier of 2046 or expiry of the Port Lease, depending on the final term of the Port Lease

7. Summary Timeline (Indicative)





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|-------------------------|---|
| 2026 | Bylaw consideration and registration of restrictive covenant, subject to Council approval |
| Est. end of 2030 | Completion of safety upgrades and establishment of Baseline QRA |
| ~2038 & 2040 | 8 and 10-year QRA reviews |
| ~2041 | Independent BAT review |
| 2044–2046 | End date expected the earlier of December 31 st , 2046 or termination of the Port Lease. |

