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**RE: CN RIGHT-OF-WAY VEGETATION CONTROL**

Dear Mayor,

I hope this letter finds you and your family safe and healthy as the country continues to fight the COVID-19 pandemic.

The Provincial, State and Federal governments have recognized railways as essential service providers. CN remains committed to running our railway safely and playing our role in moving the critical supplies citizens are counting on during these difficult times.

To that end, we are reaching out to advise you of our vegetation control activities in your area between April and October 2021. A regularly updated schedule will be available at [www.cn.ca/vegetation](http://www.cn.ca/vegetation).

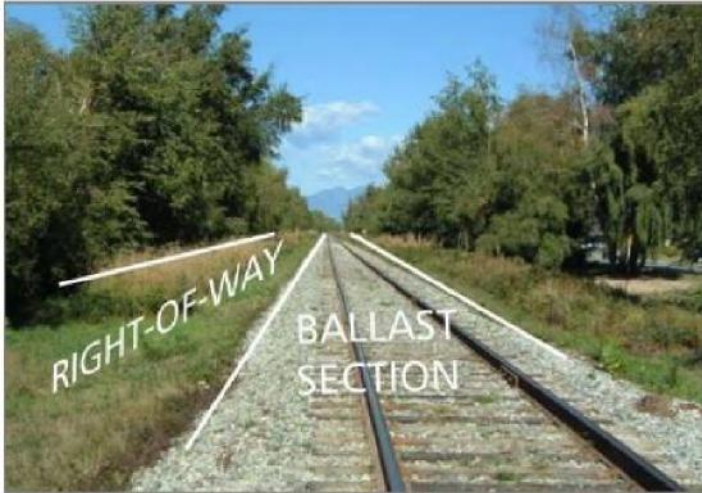
If not managed properly, trees, brush or other vegetation can severely compromise rail and public safety. Vegetation can impede the view motorists have of oncoming trains, and increase the risk of crossing accidents. Moreover, unwanted vegetation can damage the integrity of the railbed, interfere with signals and switches, contribute to track side fires, compromise employee safety, reduce visibility for train crews at road crossings/train control signals and track side warning devices, to name a few of the potential risks.

Our annual vegetation control program is designed to mitigate these risks by managing brush, weeds and other undesirable vegetation. CN's vegetation control program is a critical contributor to safe operations and assists in contributing to the overall safety of the communities through which we operate.

Control measures: CN manages vegetation using both chemical and mechanical methods. We are sensitive to concerns your community may have regarding chemical vegetation control. I would like to assure you that at CN, we are committed to environmental safety and sustainability.

The track infrastructure is composed of two main sections, the ballast section typically ranging from 16-24 feet (which is primarily gravel and supports the track structure) and the right of way portion (which is the area outside of the ballast section to the CN property boundary).

The 16-24 foot ballast section and the areas around signals and communications equipment that are critical for safe railway operations will be managed using chemical methods. Application in these safety critical areas is done by spray trucks or spray trains with downcast nozzles that spray a short distance above the ground surface with shrouded booms, specially designed to limit the chemicals from drifting. The right-of-way section is primarily maintained using mechanical control methods such as mowing or brush cutting, however, small areas within the right-of-way that contain noxious or invasive weeds may be chemically treated.



CN will use chemical control techniques on the ballast section throughout the network for safety reasons. Furthermore, when chemicals are applied to the ballast section via spray train or truck, as outlined in the photo below, additives called surfactants that make the chemical work better may be included to help manage the application.



CN has retained professional contractors qualified to undertake this work. They are required to comply with all laws and regulations applicable to CN. In addition, the contractors will ensure that vegetation control is performed with consideration of the environment and in accordance with the highest industry standards.

## Inquiries

Should your community have any noxious weed removal requests, we ask that you contact CN's Public Inquiry Line at [contact@cn.ca](mailto:contact@cn.ca) or fill out the form at [www.cn.ca/vegetation](http://www.cn.ca/vegetation) before June 1, 2021 with the specific information and location. CN will make every effort to include those locations as part of our 2021 Vegetation Management Program. All notices sent after the above-mentioned date will be included in the 2022 Vegetation Management Plan.

We look forward to working with you and answering any questions you may have regarding our vegetation control activities in your community.

Please find attached the notices CN is publishing in local papers to advise the public. We would kindly ask that you post copies on your community's website and at City Hall or other central locations for a wider distribution.

For any questions or more information, please contact the CN Public Inquiry Line by telephone at 1888-888-5909, or by email at [contact@cn.ca](mailto:contact@cn.ca).

Please also find attached a list of FAQs regarding the program that may be of further assistance.

Best regards,

Luanne Patterson  
Senior System Manager, Environmental Assessment



## Annual Vegetation Management Program

### Frequently Asked Questions (FAQs)

***Where can I get more information about CN's vegetation management program?***

For more details please visit our website at [www.cn.ca/vegetation](http://www.cn.ca/vegetation)

***Why does CN need to remove vegetation along its train tracks annually?***

At CN, safety is a core value. Part of maintaining and operating a safe railway is ensuring vegetation is managed along our corridors. CN also has an obligation, pursuant to the *Rules Respecting Track Safety*, adopted under the *Railway Safety Act*, to ensure that vegetation on or immediately adjacent to the railway roadbed is controlled. More specifically, the Rules require federal railways to ensure the track is free of vegetation that could create fire hazards, affect the track integrity or obstruct visibility of operations and inspections. Separate regulations also require removal of vegetation to ensure every grade crossing meets sightline requirements.

***Where does CN remove vegetation?***

For the purposes of vegetation control, CN divides its rail lines into two components: the ballast section and the right-of-way. The ballast section (graveled area) covers a 16 to 24ft width (4.9 to 7.3m). The right-of-way section covers a 42ft width (13m) on each side of the ballast section.







## Annual Vegetation Management Program

Vegetation in the right of way section needs to be controlled to protect sight lines for train crews to see signal systems and at road crossings, prevent trees from fouling the track during storms, reduce fuel loading to prevent fires, minimize wildlife mortality, ensure good drainage along ditches and culverts, amongst other safety requirements and is primarily controlled mechanically, by mowing and cutting of vegetation. Certain herbicide products are used (excluding glyphosate) to encourage grass rather than shrubs and trees.

The ballast section, on the other hand, is the most critical area as it supports the track infrastructure that supports the movement of freight and passengers and provides an area for train crew to safely inspect their train. Given the crucial role it plays in ensuring the safety and integrity of rail operations, this section must be clear of all vegetation. The only proven way to effectively completely remove vegetation in the ballast section is through chemical application.



### ***How will you manage dry plants that remain once the spraying is completed?***

Ensuring vegetation is controlled on an annual basis is the best method to reduce larger volumes of dead and dry plants. This is because it eradicates vegetation before it grows, reducing the amount of dead plant material. CN's program has been developed specifically with this in mind. Most vegetation, once dead, will naturally decay leaving little debris. As for the right-of-way, the herbicides used are selective and the grass cover will remain intact while shrubs or noxious weeds will be controlled.



## Annual Vegetation Management Program

### ***What herbicides will CN be using?***

The choice of chemical used depends on the specific plants targeted. All pesticides used in Canada are approved for use in Canada and the province in which they are applied. The chemicals for 2021 may include:

Pesticide Product Brand Name	Active Ingredients	PCP Registration Number
VP480 (Dow)	Glyphosate (480g/L)	28840
Esplanade (Bayer)	Indaziflam (200 g/L)	31333
Overdrive (BASF)	Diflufenzopyr (20%)	30065
Detail (BASF)	Dicamba (50%)	32773
Arsenal (BASF)	Saflufenacil (29.74%)	30203
Navius (Bayer)	imazapyr isopropylamine (26.7%)	30922
Gateway (Corteva)	Metsulfuron-methyl (12.6%)	31470
VisionMax (Bayer)	Aminocyclopyrachlor (39.5%)	27736
	Paraffinic Oil (586 g/L)	
	Alkoxylated alcohol non-ionic surfactants (242 g/L)	
	Glyphosate (540 grams acid equivalent per litre)	

### ***Will you be using Glyphosate. If so, is it dangerous for us or my pets?***

All pesticides CN uses in Canada are registered by Health Canada's Pest Management Regulatory Agency (PMRA) and have been approved for use in the province in which they are applied. Protection of human health and the environment is Health Canada's primary objective in the regulation of pesticides and all pesticides must undergo rigorous science-based assessments before being approved for sale in Canada. The PMRA also re-evaluates registered pesticides on a cyclical basis to ensure they continue to meet modern health and environmental standards. The PMRA re-evaluated glyphosate in 2017 and reconfirmed that products containing glyphosate do not present risks to human health or the environment when used in accordance with revised label directions. CN's vegetation control contractor uses glyphosate in accordance with label directions.



## **Annual Vegetation Management Program**

### ***Has CN tried any non-chemical weed control options in the past, such as weed whacking? Have they worked?***

CN has used weed cutting in the past to control vegetation, but this does not remove the roots, and actually encourages more growth. It is not an effective long-term solution for vegetation removal along railway tracks. The application of steam injection has also been investigated; however it has proven ineffective in killing the roots, which, if left to continue growing, could compromise the integrity of the rail bed, causing unsafe operating conditions.

CN has also explored other options, such as high concentrate vinegar (acetic acid), however this was deemed not to be a viable option as the acid reacts negatively with steel and the sensitive electronic monitoring equipment used to regulate safe movement and operation of our trains.

### ***I am an organic farmer adjacent to your tracks, should I be worried?***

Most of the vegetation control focuses on the ballast section (graveled area) which is 16 – 24 feet (4.9 to 7.3 meters) wide, leaving about 42 feet (13 meters) of right-of-way on each side of the ballast. The equipment used for application is a shrouded boom which focuses the spray downward to reduce potential drift. Application must also be done during appropriate weather conditions, including low wind levels.

### ***Many properties back onto the railway. Are Detail, Overdrive, Esplanade, VP480, VisionMax, Arsenal Powerline, Navius, and Gateway safe to use in close proximity to people and pets?***

All pesticides used in Canada must be registered by Health Canada's Pest Management Regulatory Agency (PMRA), which has one of the toughest regulatory requirements in the world for approving products for safe use. CN only uses pesticides that have been approved for use in Canada and the province in which they are applied. When used according to label directions, PMRA has evaluated them to be safe.

### ***Can I request my area not be sprayed?***

At CN, safety is a core value. CN is governed by the Railway Safety Act and must comply with the laws and regulations. Vegetation control is a key component of keeping our employees and the communities in which we operate safe. Ensuring vegetation is kept clear of our infrastructure, signals, road crossing sight lines and enabling our teams to inspect and maintain the track is critically important. As a result, all areas of the CN ballast section will be treated to control vegetation.