

SENATE FLOOR ALERT

AB 1788 – OPPOSED



August 26, 2020

To: Members, California State Senate

RE: AB 1788 – OPPOSED

On behalf of the undersigned groups, we write to express our opposition to the August 20 version of AB 1788.

Until now, we have been neutral on the bill because of exemptions that would allow for use of second-generation anticoagulant rodenticides (SGAR) around agricultural operations. However, the most recent amendments would most likely remove all such products from the marketplace.

The bill states in order for the Department of Pesticide Regulation to certify the reevaluation it's currently considering it must ensure the continued use of SGARs is not reasonably expected to result in significant adverse effect to non-target wildlife. Under the current bill, *"significant adverse effects to non-target wildlife"* is defined as the *"loss of any individual bird or mammal bird, mammal, reptile, amphibian, or fish not designated as a target pest on the pesticide product label."* This will be an impossible standard to meet. The only way the Department can ensure a single non-target species is not lost, is to deny the legal use of SGARs in any capacity. Therefore, ultimately the exemption provided for agriculture and food related activities, will be moot. It is indisputable that the use of these pest management tools are necessary to protect agricultural operations and ensure the public has access to safe food products.

By adding this definition, the bill seeks to circumvent the science-based risk assessment process and the expertise at the Department of Pesticide Regulations and unilaterally make risk management decisions for these products.

It is for these reasons, we must oppose AB 1788.