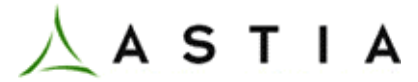




Governor's Environmental and
Economic Leadership Award
2008



Investors' Circle Top 20



2008 Cleantech Innovator
Award

EPA/CPDA SYMPOSIUM ON INERT INGREDIENTS

FEBRUARY 3-4, 2010



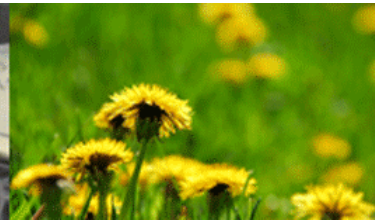
Overview of MBI

- ❖ **Founded April 2006, by biopesticide industry expert Pam Marrone**
- ❖ **HQ in Davis, California**
- ❖ **Both in-house screening and in-licensing**
- ❖ **2 plant extract-based products on market; 3 microbial pesticides pending at EPA**
- ❖ **20 candidates under various stages of R&D**
- ❖ **8,000 isolates banked....and growing**

Formulate for NOP compliance, but sales primarily in conventional ag

“NOP-COMPLIANT FORMULATION PROCESS”

- ❖ Develop a formulation that is efficacious
- ❖ ? Are proposed inerts NOP compliant? (Aug '04 4A-4B)
- ❖ ? Are proposed inerts tolerance exempt? (cross ref.)
- ❖ ? Contact EPA inerts branch-BPPD for guidance
- ❖ ? Proprietary formulation inerts (e.g. surfactant)
- ❖ Submit dossier for review:
 - ✓ *EPA safety review*
 - ✓ *EPA NOP compliance of CSF and label*
 - ✓ *3rd Party NOP compliance of CSF and label*



CHALLENGES-CONCERNS

- ❖ NOP compliant inerts based on “non-existent” listings
- ❖ Uncertainty about NOSB future policy on inerts
- ❖ If NOP list changes significantly, major time-resource outlays to develop new formulations, and possible market disruption
- ❖ New inerts? Time for NOSB-3rd Party review and approval
- ❖ Uncertainty regarding new inerts disclosure proposal, as well as other possible inerts policy changes
 - ✓ “Patentability” of biopesticide/organic A. I. s

In general, NOP compliant pesticides a small fish in big pond.



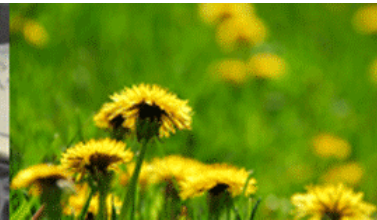
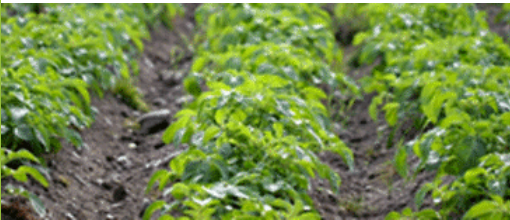
POSITIVE STEPS

- ❖ **Early discussion drafts have caused concerns, but the NOSB process is seeking data and input**
- ❖ **Signs of greater information exchange between EPA, USDA and NOSB**
- ❖ **EPA providing more clarity and guidance around NOP labeling and use site policies**
- ❖ **EPA working with registrants to reduce bottlenecks**
- ❖ **3rd party certifiers are engaged and providing input**



The Future?

- ❖ *Inerts policies appear to be evolving, multifaceted...*
 - ✓ *What is the scope of the discussion?*
 - ✓ *What are the key issues-drivers?*
 - ✓ *How best to approach these issues?*



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