



Animal and Plant
Health Inspection
Service

Veterinary Services

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Serial Release - Processing Inventory Transfers

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Notes:

Processing Inventory Transfers

An inventory transfer is the movement of all, or part of a serial released for market under one product code to another product code or serial from the same manufacturer. Occasionally transfers may be done by different manufacturers during a merger or acquisition. However, regardless of the situation, the Outlines of Production for both product codes must be the same for the Specialist to consider these requests.

At least three separate APHIS Form 2008s (Form 2008s) are required for a complete inventory transfer.

Samples will be needed for the 1st 2008 and the 3rd 2008 to process the full request.

1st Form 2008 - Requesting market release of a serial

Process in accordance with CVB-SOP-0032, *Processing Serial Records*

2nd Form 2008 – Requesting inventory transfer

1. Biologics Compliance Assistant (BCA) will verify the following information on the 2nd Form 2008:
 - a. The 1st Form 2008 has an APHIS disposition that allows the product to be freely marketed (Not to be Tested, Other – Serial Released for Market, Tests Completed Satisfactory). **Note: Serials with an APHIS disposition of Other – Serial NOT RELEASE FOR MARKET or Tests Completed UNSATISFACTORY may be transferred under certain circumstances as allowed for by the Specialist. (Example, a serial that is not compliant with the initial OP but meets the requirements of the OP to which it is being transferred).**
 - b. Block 10, Inventory for Release, should list the amount of inventory to be transferred. Verify it is the same or less than the inventory listed on the 1st Form 2008. If it is more, the BCA and/or Specialist should question the transfer. Reprocessing may be involved and should be submitted as a different submission request.
 - c. The Product Code and Serial Number the inventory will be transferred to, should be listed in Block 11, Remarks. If using the NCAH Portal, the field for inventory transferred to, should be filled out.
2. Block 12, Disposition by the Firm, should be marked as “Other” Inventory Transfer Requested.
3. The BCA will confirm release of the first leg of the transfer and send the 2008 to Specialist Review.
4. The Specialist selects the appropriate APHIS disposition electronically under specialist review and returns the electronic and hard copies (if applicable) to the BCA for processing.
5. The BCA prepares Block 16, Disposition by APHIS, on the 2nd Form 2008 as “Other” Inventory Transfer Approved.

3rd Form 2008 – Requesting market release of serial under new product code

1. The firm should submit the 3rd Form 2008 with a note in Block 11, Remarks, “Inventory Transferred from Code (as noted on the previous two Form 2008s), Serial

- (as noted on the previous two Form 2008s).” Block 12, Disposition by Firm, should be marked appropriately (usually eligible for release).
2. Process in accordance with CVB-SOP-0032 with the following modifications:
 - a. BCA will verify Inventory Transfer was approved, including the correct amount of inventory.
 - b. The BCA prepares Block 16, Disposition by APHIS, on the 3rd Form 2008 with appropriate APHIS Disposition and “Other” Inventory Transfer Acknowledged.