

January 15, 2003

VETERINARY SERVICES MEMORANDUM NO. 800.108

SUBJECT: Inventory and Disposition Records

TO: Veterinary Biologics Licensees, Permittees, Distributors, and Applicants
Directors, Center for Veterinary Biologics
Regional Directors, Veterinary Services
Area Veterinarians in Charge, Veterinary Services
State Veterinarians
Investigative and Enforcement Services

I. PURPOSE

This memorandum clarifies the recordkeeping responsibilities of licensees, permittees, and distributors concerning the sale, shipment, or other disposition of biological products subject to the Virus-Serum-Toxin Act.

II. BACKGROUND

Title 9, Code of Federal Regulations (9 CFR), Section 116.2, requires each licensee, permittee, and distributor of biological products to maintain detailed disposition records showing the sale, shipment, or other disposition made of the biological products handled by such person. Such records are subject to inspection by APHIS pursuant to 9 CFR, Section 115.2.

Section 115.2 of the regulations provides that any biological product, the container of which bears a United States veterinary license number or a United States veterinary permit number may be inspected at any time or place to ensure that such product is not worthless, contaminated, dangerous, or harmful. If worthless, contaminated, dangerous, or harmful product is found as a result of such inspection, it could be subject to seizure, detention, or condemnation procedures in accordance with the regulations under 9 CFR 118.

Inspection of product and review of inventory and disposition records may be necessary in order to account for each product and to enable specific products to be traced.

III. PROCEDURES

Each licensee, permittee, and distributor of biologicals sold in the U.S. must maintain for APHIS review detailed inventory and disposition records showing the sale, shipment, or other disposition made of the biological products handled by such person.

/s/ W. Ron DeHaven

W. Ron DeHaven
Deputy Administrator
Veterinary Services