

## 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 from the same manufacturer. The Outlines of Production for both product codes must be comparable for the Specialist to consider these requests.

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

### **1<sup>st</sup> Form 2008 - Requesting market release of a serial**

Process in accordance with ICSOP0010, *Processing Serial Records*

### **2<sup>nd</sup> Form 2008 – Requesting inventory transfer**

1. Biologics Compliance Assistant (BCA) will verify the following information on the 2<sup>nd</sup> Form 2008:
  - a. The 1<sup>st</sup> Form 2008 has an APHIS disposition that allows the product to be freely marketed (NBT, SAT, SRL). **Note: Serials with an APHIS disposition of NRL or UNS may be transferred under certain circumstances as allowed for by the Specialist.**
  - 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 1<sup>st</sup> Form 2008. If it is more, the BCA and/or Specialist should question the transfer.
  - c. The Product Code and Serial Number the inventory will be transferred to should be listed in Block 11, Remarks.
2. Block 12, Disposition by the Firm, should be marked as “Other” Inventory Transfer Requested. The BCA will initial the 2<sup>nd</sup> Form 2008 once the above information is verified.
3. The BCA will notate release of the first leg of the transfer in the remarks section of the APHIS Form 2008 and initial. Specialist initials in Block 11 of the 2<sup>nd</sup> Form 2008 indicate approval.
4. The Specialist selects the appropriate APHIS disposition electronically under specialist review and returns the electronic and hard copies to the BCA for processing.
5. The BCA prepares Block 16, Disposition by APHIS, on the 2<sup>nd</sup> Form 2008 as “Other” Inventory Transfer Approved.

### **3<sup>rd</sup> Form 2008 – Requesting market release of serial under new product code**

1. The firm should submit the 3<sup>rd</sup> 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 ICSOP0010 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 3<sup>rd</sup> Form 2008 with appropriate APHIS Disposition and “Other” Inventory Transfer Acknowledged.