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CLEARINGHOUSE RULE 99–151

Comments

[<u>NOTE</u>: All citations to "Manual" in the comments below are to the <u>Administrative Rules Procedures Manual</u>, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated September 1998.]

2. Form, Style and Placement in Administrative Code

a. The analysis to the rule should explain why the rule prohibits Wisconsin grade labeling of cheese from other states or countries.

b. The analysis to the rule should explain why, in s. ATCP 81.22 (1), the phrase "if there is a Wisconsin grade standard for that variety in subchapters IV to VII" is added.

c. In the first sentence added to s. ATCP 81.20 (intro.), "cheese" should be changed to "the cheese."

d. The phrase added to s. ATCP 81.24 (1) should be stated in the affirmative. For example, that phrase could be rewritten as follows: "A dairy plant licensed under s. 97.20, Stats., may cut, wrap and grade label cheese for retail distribution if the cheese is graded by a cheese grader licensed under s. 97.175, Stats., and the retail packages are grade labeled as required under s. ATCP 81.22."