



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 01-058

Comments

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

2. Form, Style and Placement in Administrative Code

SECTIONS 4 and 5 should be reversed since s. ATCP 80.56 (2) numerically precedes s. ATCP 80.56 (4).

5. Clarity, Grammar, Punctuation and Use of Plain Language

a. The department may wish to be more specific about the reasons for the rule. It would appear that the authorization not to report a test disclosing the presence of a pathogenic organism or toxin could result in the department not being aware of significant contaminants within a dairy plant. Is the department confident that “non-reporting” will not shield serious problems within a dairy plant?

b. Is there a need to define “product code”?

c. Is there a need to define the terms “pathogenic organism” or “toxin”?