

# WISCONSIN LEGISLATIVE COUNCIL STAFF

## ***RULES CLEARINGHOUSE***

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## **CLEARINGHOUSE RULE 94-175**

### **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 October 1994.]**

#### **2. Form, Style and Placement in Administrative Code**

In s. ATCP 81.70 (1), Table 13, the seventh line of the table is labeled “RANCID” instead of “LIPASE or RANCID,” as it is labeled in the table being amended. Either the words “LIPSASE and” should be added or the proposed order should indicate that those words are being deleted.

#### **4. Adequacy of References to Related Statutes, Rules and Forms**

Section ATCP 81.91 (1) cites s. ATCP 80.32, which becomes effective December 1994. The proposed order should indicate to the reader that this rule is not yet effective.

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

- a. In s. ATCP 81.20 (6), the comma after the word “years” should be deleted.
- b. In s. ATCP 81.70 (1), Table 13, the forward slash after the word “FEED” in the fourth line of the table should be deleted.
- c. In s. ATCP 81.81 (3) (a), a quotation mark should be added before the phrase “WISCONSIN GRADE A.”
- d. The title of subch. IX would be more consistent with the other titles if it were “BABY SWISS; STANDARDS OF IDENTITY AND LABELING” or “BABY SWISS; IDENTITY AND LABELING STANDARDS.”

e. In s. ATCP 81.91 (2), the word “to” should be inserted prior to the first occurrence of “106° F.”

f. In s. ATCP 81.92, it appears that some of the ingredients must be used in the manufacture of baby swiss cheese and some may be used. The section might be clearer if sub. (1) (intro.) stated: “The following ingredients shall be used in the manufacture of baby swiss cheese:” and was followed by paragraphs describing the dairy ingredients, clotting enzymes and cultures or enzymes. The remaining ingredients could then be placed under sub. (2) (intro.), which would state: “The following ingredients may be used in the manufacture of baby swiss cheese:”.

Additionally, all of the paragraphs resulting from the suggested change above could be altered so that they are not complete sentences, but a list of ingredients. For example, in current sub. (1), the words “may be” could be deleted. In current sub. (2), the words “may be used” could be deleted.