

Compliance Review and Interpretations Committee 2007 Annual Report

The membership of the Compliance Review and Interpretations Committee (CRIC) changed when Dan Noble from Wyoming resigned and West Virginia Delegate John Doyle was appointed to the position. Current members include Larry Wilkie (Chair), Dale Vettel (Vice Chair), Delegate John Doyle, Andy Sabol, Myles Vosberg, Joe VanDevender and Tony Mastin.

SLAC submitted five rules to CRIC for review, all of which were sent on to the Governing Board with a recommendation for approval and were subsequently adopted. Petitions for membership from Vermont, Rhode Island and Washington were reviewed, and recommendations to approve the petitions sent to the Governing Board. In addition, CRIC worked on rules relating to administrative procedures of the Committee. Rule 902.1, Interpretive Rules, and Rule 904, Compliance Petitions, were drafted and have been adopted by the Governing Board. The Committee is in the process of drafting a rule on annual certification of member states.

Over this past year CRIC reviewed 13 interpretations requests. However, six of those requests were either withdrawn, put on hold, or referred to SLAC for additional work. Recommendations for five of the requests were approved by the Governing Board and two recommendations were submitted to the Governing Board to be discussed at the September 2007 meeting (see list below).

Approved Interpretation Recommendations:

- 2006-08, South Dakota request pertaining to amnesty
- 2006-09, Ernst & Young, LLP request pertaining to amnesty
- 2006-11, Rhode Island request pertaining to the definition of “bulk servings” as used in the definition of “prepared food”
- 2006-12, McCarter & English, LLP request pertaining to the definition of “direct mail”
- 2007-01, Avalara request concerning the definition of “drug”

Interpretation Recommendations submitted for the September Governing Board meeting:

- 2007-02, Lafarge North America request concerning sourcing
- 2007-03, General Nutrition Centers, Inc. request pertaining to the definition of “flour” as used in the definition of “candy”

Submitted by: Larry Wilkie, Chair
Compliance Review and Interpretations Committee
August 30, 2007