more commonly stored. The major distinction between the two standards for grades of these onions is the lot tolerances; 10 percent for BGG and 5 percent for Other Than. Although separated by type and tolerances, many similarities exist in the grading of these onions. The different types of onions are affected by most of the same defects. The procedures for sampling and performing grading activities are essentially the same regardless of which standard is being applied. The standards were established and have been revised separately over the years to reflect the needs of their respective industries.

A broad spectrum of growers and shippers of onions who utilize both standards, represented by The National Onion Association (NOA), have requested that the minimum sample size for consumer size packages be designated at 20 pounds. While considering the NOA's request the Department, through a periodic review, decided to take the opportunity to bring the standards into closer uniformity with each other and conformity to current harvesting, handling and marketing practices. Therefore, this proposal would revise both standards by the addition of a required minimum sample size. It would also include the following: An additional grade for peeled onions, an additional size designation for colossal onions and technical revisions to promote uniformity and clarity wherever possible. The following are revisions proposed herein:

—"Fairly firm" is now a basic requirement only in the Other Than standard. "Fairly firm" would be added as a basic requirement to the U.S. No. 1 grade in the BGG standard (§ 51.3195) and also included in the Definitions section (§ 51.3205). This would make both U.S. Standards uniform in their basic requirements for a U.S. No. 1 onion.

—The BGG standard currently contains paragraphs for tolerances in each of the respective grade sections. The Other Than standard now contains a specific section entitled "Tolerances" which is the format established for more recent and current standards. To make referencing much easier and to make both U.S. Standards current and uniform in the way they read, a specific section for Tolerances (§ 51.3200) would be established in the BGG standard. The actual tolerances would not be changed, only the location in the standard.

-A U.S. No. 1 Peeled grade would be established for both standards (§§ 51.2835 and 51.3196). The marketing of fresh-cut, "ready to use" products has expanded greatly in the last few years in the produce industry. Onions offered for sale whole and completely peeled as a fresh product ready to use have been part of this expanding market. This grade would provide clear and defined trading language helping to facilitate the increased movement in these type of onions. The new grade would read as follows:

"U.S. No. 1 Peeled consists of onions which meet all the requirements for the U.S. No. 1 grade" ("except for damage by peeling" in the Other Than standard). "Furthermore, onions must be free from any outer papery scales in order to meet the requirements of this grade."

A 5 percent tolerance for onions in a lot with outer papery scales in any amount would also be provided in the tolerance section.

—Both the BGG and Other Than standards contain the grade classification "Unclassified." This grade would be deleted from both standards since it is not an actual grade classification and is rarely, if ever used. Elimination of Unclassified would also maintain consistency with

newer versions of standards for other commodities.

—Currently size classifications in each of the standards are similar but not completely the same. Each standard now contains size designations for small, medium and large sizes. The BGG standard also references a Repacker or Prepacker size, while the Other Than standard contains export small, export medium and export large sizes as well as regional specifications for the medium size.

Size classifications would be revised and placed in chart form for each standard (§§ 51.2837 and 51.3199) to achieve uniformity and clarity.

A new size classification for colossal onions would be added to both standards based on the increased trade in this size product and the need for common trading language.

In the Other Than standard three additional changes would also be made to the size classifications. First, the reference to export sizes would be eliminated since these sizes are rarely, if ever used. The reference to these sizes in the Application of Tolerances section would also be eliminated. There would be no need for this reference if the sizes were dropped. Next, the medium size classification would no longer give smaller size exception for "onions grown in Minnesota, Iowa, and States east of the Mississippi River * * *. This would eliminate confusion in the trade and standardize across the nation the size of onions referred to as "Medium." Finally, the Repacker/ Prepacker size currently only referenced in the BGG standard would be included in the Other Than standard. This would make both standards completely uniform along size classifications providing common and standardized trading language in reference to size for onions shipped from anywhere in the country. The new size chart proposed for each standard would read as follows:

Size designation	Minimum diameter		Maximum diameter	
	Inches	Millimeters	Inches	Millimeters
Small	1	25.4	21/4	57.2
Repacker/Prepacker 1	13/4	44.5	3	76.2
Medium	2	50.8	31/4	82.6
Large or Jumbo	3	76.2	(2)	
Colossal	33/4	95.3	(2)	

¹ In addition to the sizes specified, a lot of onions designated as Repacker or Prepacker shall contain at least 60 percent or more 2 inches or larger in diameter.

² No requirement.

 —Sample size is not currently defined in the standards for onions.
 Inspections are performed using the consumer package that onions are packed in as the sample. While this may be a fair and accurate way to determine percentages of defects for 50 pound sacks, when smaller

consumer size packages (i.e., 2, 3, 5, pounds) are taken as the sample a lot may be thrown out of grade by a proportionately small number of