CIWM is the professional body for the resource and waste management sector. It represents around 5,600 waste and resource management professionals, predominantly in the UK but also overseas. CIWM sets the professional standards for individuals working in the sector and has various grades of membership determined by education, qualification and experience.

**Modification to the Code of Practice on Litter and Refuse:**

**Guidance on effective enforcement**

CIWM welcomes the opportunity to comment on this important update to the guidance document. CIWM is happy to work with Defra on any future review and update to the guidance, as indicated in the Litter Strategy.

*1 Are any aspects of the guidance unclear? (Please identify relevant paragraph numbers, and suggest how it could be clarified.)*

The guidance explains the requirements clearly.

CIWM does suggest a few typographical suggestions to aid reading and understanding.

Paragraph36 – fourth line of paragraph. Suggest adding ‘as’ between …such littering…

Paragraph 42 – bullet point c. Suggest …offenders guilt to support…

Paragraph 98. Question as to why there is a colon at the end of the final sentence.

Paragraph 99. Suggest the semi-colon is changed to a colon at the end of the sentence.

Paragraph 123. No other bullet points have semi-colons at the end and there is no full stop at the end of other bullet points.

*2 What changes, if any, will you need to make to existing practices in order to comply with the new guidance*

CIWM has no comment to make.

*3 What do you estimate would be the costs of making any changes in order to comply with the guidance*

CIWM has no comment to make.

*4 Do you foresee any savings attributable to compliance with the guidance?*

CIWM has no comment to make.