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Dear Sukhninder

ORR's penalties statement consultation

Thank you for the opportunity to respond to ORR's consultation on proposed modifications to its penalties statement.

The consultation particularly focuses on giving ORR more flexibility to accept reparations in lieu of a financial penalty. We note that the proposals put forward by ORR within the consultation are broadly consistent with a similar suggestion made by Network Rail in its response to ORR's 2008 consultation on changes to its approach to financial penalties.

We consider that the proposed changes to the policy are appropriate and would bring ORR into line with the approach adopted by other regulators.

We have no particular comments regarding the detailed wording of the revised penalties statement other than to note that paragraph 25 of the draft penalties statement refers to 'reparation' as opposed to 'reparations'.

We can confirm that no part of our response is confidential and we are content for it to be published in full.

Yours sincerely

A handwritten signature in black ink, appearing to read "J Haskins".

Jonathan Haskins
Head of Regulatory Compliance & Reporting