

**Commission of Inquiry into the Diaphragm Wall and Platform Slab Construction Works
at the Hung Hom Station Extension under the Shatin to Central Link Project**

FIRST WITNESS STATEMENT OF JOE LEUNG

I, JOE LEUNG, of [REDACTED], say as follows:

1. I was, at all material times, a Site Agent with Leighton Contractors (Asia) Limited (“**Leighton**”), the main contractor for the Hung Hom Station Extension contract (Contract SCL 1112) (“**Project**”) under the Shatin-Central rail link project. The project manager for the Project is MTR Corporation Limited (“**MTRCL**”).
2. Unless otherwise stated, the facts stated herein are within my personal knowledge and are true. Where the facts and matters stated herein are not within my own knowledge, they are based on the stated sources and are true to the best of my knowledge, information and belief.

My qualification and experience

3. I am a civil engineer. I hold a bachelor's degree in civil engineering. I joined Leighton as a Site Agent in May 2013 and was part of the engineering construction team. The engineering construction team is responsible for method statement programming, procurement, management of resources, coordination, supervision and inspection of the works, sequencing of the works and worker safety.
4. Prior to joining Leighton, I was involved in various large projects including the Wan Chai reclamation project and the Disney project. I have about 20 years' experience in the construction industry.
5. I worked on Area C of the East West Corridor platform slab (“**EWL Slab**”) and Areas C of the North South Corridor platform slab (“**NSL Slab**”).

6. I am no longer employed by Leighton. I left the company on 19 July 2018 because of seeking greater personal development.

My role and responsibilities

Working hours

7. My usual working hours on the Project were from 8am to 6pm Monday to Friday and alternate Saturdays.

Duties and responsibilities

8. I had a planning and supervisory role on the Project. I did not personally undertake inspections of the works, including the reinforcement bar (“rebar”) fixing, but I was responsible for overseeing the inspection processes and of the progress of the Project generally in my specific areas. My team included sub-agent (later site-agent) Andy Ip and engineers, Edward Mok, Man Sze Ho and Sasa Leung. The engineers would undertake the routine inspections. My role also included planning and preparing for various works programmes, particularly in the earlier phases of new works in the Project. This involved identifying potential issues well in advance. I would understand the drawing details and consider the best method to carry out the works. I would work with the engineering design team and involve the relevant subcontractors. I would as necessary report my ideas to my senior, Gary Chow, and seek his advice. Once the design package had been finalised it would be passed to the frontline team who would prepare the required materials and resources.

Daily routine

9. I set below a summary of my daily routine while working on the EWL Slab.
10. I would arrive in the office by 8 am and start my day in the site office. On a typical day, I would check emails, discuss with my senior the next steps for the work and the methods to build them and meet with the engineering design team. I would spend quite a lot of time thinking on my own about the appropriate methods to build the works. I would have telephone calls with subcontractors to discuss the methods to build the works and

whether there were any difficulties that needed to be discussed. I sat in the same office as my Leighton colleagues in adjacent office bays. I would communicate with them (including members of my team) on a daily basis. I would also communicate with MTRCL engineers and inspectors almost every day. This was usually done face to face (as we shared the same office) and by telephone. We would discuss the progress of the Project and different methods of construction. This was a key focus of the MTRCL engineers and inspectors. Whenever there were technical issues, we would discuss them and try to find a solution.

11. In the afternoon, the work routine would be similar to the morning. We would sometimes have long meetings with the engineering design team or with the MTRCL team. I might discuss commercial issues with our quantity surveyor team.
12. I would visit the site every two or three days. Each visit would last between one and one and a half hours. I would walk by myself from the South to the North area to check on the progress of the works and ensure that they were following the planned schedule and method. If I met a subcontractor during my walk, I would talk to them about the works. I would also normally take part in the weekly "safety walk". This was arranged by the MTRCL safety team. This was a general review of safety issues such as whether workers were wearing the correct safety equipment. If any issues were identified, requests would be made for improvements. In addition, Leighton's in-house safety team would have similar safety walks around the site. I would normally join those walks too.
13. I did not undertake direct supervision or training of the members of my team. Andy Ip had a more hands-on role in these matters. However, the team were experienced engineers capable of conducting routine supervision work. I would discuss with them the works that would come next, give them the drawings and provide them with background details. Once the subcontractors were ready to commence work, I would let the team know and introduce them to the subcontractors and then kick off the work. The team would sometimes ask questions. We did not have formal meetings between our team but had frequent informal discussions about issues and questions as they arose.

14. The subcontractors on the EWL Slab and NSL Slab were Fang Sheung Construction Company (“**Fang Sheung**”), which was responsible for installation of the reinforcement, and China Technology Corporation Limited (“**China Technology**”) which was responsible for erecting the formwork and concreting works (until China Technology left the Project in September 2017).
15. I would regularly communicate with the subcontractors. I would usually speak to Joe Cheung at Fang Sheung. We would speak in person or by telephone. There was no specific routine to our communications. We spoke when there were matters that needed to be resolved or addressed.
16. I would speak to Jason Poon at China Technology. My communication with Poon was mainly during the early phases of the Project. We would discuss how the works should be done and discuss any drawings before they were submitted to MTRCL for approval, if that was necessary. We had less contact once the Project was up and running. I would then generally leave those routine communications to the frontline staff to handle. However, we did continue to have periodic communications to discuss the progress of the works.
17. In the early stages of the Project, we would have regular progress meetings within Leighton. I would ask the subcontractors to attend. Joe Cheung of Fang Sheung and from China Technology, Jason Poon initially, and then later other onsite staff (e.g. frontline supervisors and foremen. There were too many for me to recall their names) would usually attend these meetings. If there was rebar fixing taking place, we would make sure that Joe Cheung was present to discuss its progress. At the beginning of the Project, these meetings took place weekly. The Leighton senior staff and the frontline team would attend the meetings. From the middle of the Project, the meetings became less frequent.

Reinforcement bar fixing

18. Before the start of new works, I would speak to Joe Cheung to discuss the drawings to make sure they were correct. If I thought there was an issue, I would go back to the engineering design team to discuss.

19. As I mention above, I did not personally undertake any of the formal inspections for rebar fixing or pre-pour checks. This was done by the engineers in my team.

Allegation of the threaded ends being cut off reinforcement bars

20. I understand the Commission of Inquiry is concerned about the connection between reinforcement bars and couplers, in particular relating to allegations that the threaded ends of reinforcement bars were cut off or shortened, instead of the bars being screwed into couplers.
21. I recall being informed by someone (I do not remember who told me or exactly when) that there was an issue with a reinforcement bar that could not be properly screwed into a coupler. I do not recall the reason that the bar could not be screwed in. The issue was not specifically brought to my attention to resolve and I do not recall receiving any update on this. I do not recall being told of any other incidents like this.
22. At no time did I ever see anyone cutting off or shortening the threaded ends of a reinforcement bar. I also did not hear of this being done. I never gave any instruction, or allowed any person, to cut off or shorten the threaded ends of a reinforcement bar. I also not aware of anyone from Leighton giving such an instruction or allowing the threaded ends of reinforcement bars to be cut off or shortened.

Allegations by Joe Cheung of Fang Sheung

23. I have now been told that as part of MTRCL's investigation in June 2018, Joe Cheung made comments which suggested that Fang Sheung had cut short the longer-threaded ends of rebar with "Type B thread" to make them the same length as the threaded ends of rebars with "Type A thread", which is shorter.
24. I never heard of this happening on the Project or any other project I have worked on. Joe Cheung never mentioned this to me when the rebar fixing was taking place, nor did I hear it from anyone else. I do not know of any reason why someone would want to do this.

The works are safe

25. In my personal opinion, I am satisfied with Leighton's and my supervision of the Project in my areas of the site. We implemented a thorough system of supervision and inspection to ensure that the procedures were followed, and that the EWL Slab and NSL Slab are safe and properly constructed.

Dated the 29 day of September 2018.

Signed:  _____
Joe Leung