

IN THE COMMISSION OF INQUIRY INTO THE
DIAPHRAGM WALL AND PLATFORM SLAB CONSTRUCTION WORKS
AT HUNG HOM STATION EXTENSION UNDER THE
SHATIN TO CENTRAL LINK PROJECT

WITNESS STATEMENT OF MR LI RUN-CHAO

I, LI Run-Chao of [REDACTED]
[REDACTED] say this :-

A. Background

1. I am 24 years of age and was born in the Mainland China. I received tertiary education in Guangdong China on Construction Supervision.
2. In December 2015, I obtained a certificate from the Construction Industry Council to operate a Materials Rigger. Subsequently, I joined the China Technology Corporation Limited (“**Chinat**”) in 11 January 2016 as a Assistant Foreman. It was at that time I knew Mr. Poon Chuk-Hung (“**Mr. Poon**”) as he was the managing director of Chinat.
3. I am aware that on 10 July 2018 the Chief Executive in Council appointed the Commission of Inquiry investigating the diaphragm wall and platform slab construction works at Hung Hom Station extension under the Shatin to Central Link Project pursuant to s.2 of the Commissions of Inquiry Ordinance (Cap.86). I now give this witness statement for and on behalf of Chinat.

4. I have had the opportunity to read the witness statement of Mr. Poon dated 3 September 2018 and 14th September 2018 respectively. I agree that the facts deposed therein are true. I wish to supplement the followings. Unless otherwise stated, I shall adopt the nomenclature and abbreviations used in Mr. Poon's witness statement.

B. Works in Chinat

5. In the Hung Hom Station Construction Site, I saw workers from different organizations. All of them were wearing different uniforms:-
 - 5.1 Workers of Chinat wore a light-blue T-shirt with a logo in blue with a dragon printed near the left-upper region of the T-shirt. The back of the T-shirt is printed with the name "China Technology Corporation Limited" and the dragon logo. Workers of Chinat are not required to wear orange safety reflective vests as per the instructions of Mr. Poon.
 - 5.2 Workers of Leighton wore a T-shirt which the upper part of the T-Shirt was orange and the lower part was dark blue. Leighton's logo (which is a big letter "L" in orange colour) was printed near the left-upper chest region of the T-shirt.
 - 5.3 I cannot recall whether the workers of Fang Sheung wore any particular type of uniform.
6. In the Hung Hom Station Construction Site, all workers wore safety helmets. Workers would wear yellow colour helmets whilst foremen or engineers would wear white colour helmets. These helmets were

purchased by the workers themselves. Amongst other things, the helmets of Leighton workers would bear the Leighton's logo (which is a big letter "L") at the front of the helmets.

7. It is a practice of Chinat to have lunch meetings almost every day in the temporary offices of Chinat in the Hung Hom Station Construction Site ("**Lunch Meeting**"). Those meetings were held between Mr. Poon and employees who were above the rank of foreman. On most occasions, I would also attend the lunch meetings.

C. Witnessing Non-conformance Practices

C1. Incidents in Area B

8. Since 11 January 2016, I was assigned to work at the upper deck (i.e. the EWL slab) of Area B.
9. On a day in January 2016, Mr. Poon reported in the Lunch Meeting that he saw some workers in Area B cutting the threaded rebars of the steel threads. As I and fellow colleagues of Chinat were scheduled to pour concrete that night in Area B, Mr. Poon asked me to pay attention as to whether any workers were cutting the threaded rebars.
10. At that night after Mr. Poon mentioned the matter at the Lunch Meeting, I saw five to six workers without upper clothing cutting the threaded rebars in Area B. Because the workers were not wearing any uniforms at the time, I could not identify their affiliations. I saw two of the workers holding the steel threads, which were about 2 metres long, with one worker at each end. Then, two other workers held a handheld grinder/cutter approximately 40 cm by 20 cm in size, cutting the threaded rebars of the steel threads. At that time, I was approximately 10 metres

away from the workers and the Hung Hom Station Construction Site lighting was bright enough for me to observe clearly what they were doing. I then saw the same workers screw the steel threads into the couplers on the diaphragm wall after cutting the threaded rebars. I saw them cutting about 6 threaded rebars. They took approximately 1 odd minute to cut each threaded rebar.

11. I could see them cutting the threaded rebars clearly as the steel threads were dark brown in colour whilst the threaded rebars were silver in colour. The threaded rebars were approximately 10 cm long. When they were cutting the threaded rebars, the workers cut about 6 cm of it and allowing the remaining 4 cm to drop to the floor. That was the reason why I could estimate the length of the threaded rebars remaining on the steel threads.
12. I took about 5 to 10 minutes to observe them. As this was not part of the work of myself and/or Chinat, I did not pay much attention, nor did I stop them at that time.
13. On the following day, I mentioned what I witnessed in the Lunch Meeting. Nonetheless, I could no longer recall how the conversation actually took place. I also could not recall the actual response of Mr. Poon after I reported the incident.

C2. Incidents in Area HKC

14. In or about late-January 2016, I was assigned to work in the lower deck (i.e. NSL slab) of Area HKC.
15. On one day (which I could not recollect the exact date of such), I saw five to six workers in uniform (although I could not recall which company it was) cutting threaded rebars at the conjunction of Area HKC and Area A.

16. I saw two of the workers holding the steel threads, which was about 2 metres long, with one worker at each end. Then, two other workers held a handheld grinder/cutter approximately 40 cm by 20 cm in size, cutting the threaded rebars of the steel threads. At that time, I was approximately 10 metres away from the workers and the Hung Hom Station Construction Site lighting was bright enough for me to clearly see the workings of the two workers. This time, they did not screw the steel threads into the couplers on the diaphragm wall after cutting the threaded rebars.
17. I took about 5 to 10 minutes to observe them. As this was not part of the work of myself and/or Chinat, I did not pay much attention, nor did I stop them. I did not mention this matter to anyone at that time.

C3. Incidents in Area C

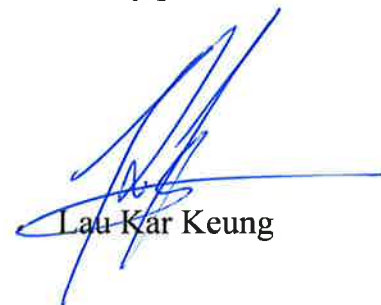
18. In or about mid-May 2016, I was assigned to work at the upper deck (i.e. EWL slab) of Area C. In Area C, I did not witness any workers cutting the threaded rebars.
19. In or about mid-January 2017, I was assigned to work at the construction site of Hong Kong-Zhuhai-Macao Bridge construction site.

I believe that the facts stated in this witness statement are true and I also enclose herewith copy of my police witness statement taken on 7th August 2018 for the Commission's reference.

Dated this the 19th day of September 2018.

chao
(LI Run-chao)

I certify that I, Lau Kar Keung, solicitor of 2nd Floor, Beautiful Group Tower, 74-77 Connaught Road Central, Hong Kong have translated the contents of this document to Mr. Li Run-chao who appeared to understand the document and approved its content as accurate and made his signature in my presence.


Lau Kar Keung