

**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**

THIRD WITNESS STATEMENT OF ANDY IP

I, ANDY IP, of 39/F Sun Hung Kai Centre, 30 Harbour Road, Hong Kong, say as follows:

1. I refer to my first witness statement dated 14 September 2018 (“**First Witness Statement**”) and second witness statement dated 18 October 2018 (“**Second Witness Statement**”). Unless otherwise stated or the context otherwise requires, any abbreviations shall bear the same meaning as in my First and Second Witness Statement.
2. I make this third witness statement to correct and supplement my First and Second Witness Statement.
3. 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.

NCR 157

4. As set out in my First Witness Statement, on 15 December 2015, during an inspection by Edward Mok and a MTRCL Inspector of Works, five rebars were identified with the threaded ends cut off. These five defective rebars were rectified that same day.
5. I recall that I assisted Kevin Harman (Leighton’s Quality Assurance Manager at the time) to prepare NCR 157 (**B4122**) to be issued to Fang Sheung in December 2015. NCR 157 was approved by Kevin Harman and issued to Fang Sheung on 18 December 2015. Both Kevin and I signed our initials at the bottom left hand corner of NCR 157 and on the transmittal form (**B4121**) that was used to send the NCR to Fang Sheung. I know that documents sent by transmittal are given to Leighton’s quality control team and then delivered by that team to the intended recipient. However, I do not know anything else about the transmittal system.

6. The version of NCR 157 that was issued to Fang Sheung on 18 December 2015 did not include anything in the section titled “Details of Required Rectification”. I recall that I left this section blank because it is usually completed by the sub-contractor who receives the NCR.
7. In January 2017, Kevin Harman (Leighton’s Quality Control Manager for the Project) asked me to close out NCR 157 by providing him with details of the rectification work that was completed on 15 December 2015. I do not know what prompted Kevin to ask me to close out NCR 157 in January 2017.
8. At that time, I spoke with the Engineers in my team (Edward Mok and Man Sze Ho) to remind myself of the details of the rectification work that had been completed to remedy the defective rebars referred to in NCR 157. I also received a copy of the RISC form dated 18 August 2016 prepared by Edward Mok to record the inspection of the rectification works and the photos that were taken of the rectification work (**B4130 - B4132**). I then relayed that information and the RISC form and photos to Kevin. Thereafter, I recall that Kevin gave me a copy of NCR 157 (**B4127**) in which the section titled “Details of Required Rectification” had been completed by hand. My understanding is that Kevin completed this section because Fang Sheung’s staff were not fluent in English. Kevin also inserted the hand written text at the bottom of the document to close out the NCR. I signed next to the section titled “Details of Required Rectification” to confirm that the details of the rectification work were correct. I also signed at the bottom right hand corner of the page to confirm that the NCR could be closed out.
9. I did not send a copy of NCR 157 (**B4127**) to Fang Sheung and MTRCL. I do not know whether a copy was sent to Fang Sheung and MTRCL.

Dated the 15th day of November 2018.

Signed:  _____

Andy Ip