

**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**

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**THIRD WITNESS STATEMENT OF EDWARD MOK**

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

1. I refer to my first witness statement on 14 September 2018 (“**First Witness Statement**”) and my second witness statement dated 15 October 2018 (“**Second Witness Statement**”). Unless otherwise stated or the context otherwise requires, any abbreviations shall bear the same meaning as in my First Witness Statement and Second Witness Statement.
2. I make this third witness statement in reply to the four photos that were disclosed to the Commission by China Technology on 26 October 2018 (the “**Poon’s New Photos**”).
3. Any allegations or matters raised in the statements mentioned in paragraph 2 above (or any other statements) which are not addressed in, or are inconsistent with, my witness statements are denied. If I do not address any allegations or matters raised in other witness statements, it should not be construed as an admission on my part.
4. 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.

**Response to the First of Poon’s New Photos**

5. In response to the first of Poon’s New Photos (with the file name “20160114\_090748.jpg”), I note that:
  - (a) The photo appears to be of the Air Duct Intermediate Slab of Area A2, which is not part of the EWL Slab or the NSL Slab. It is a separate area and on a different level to the EWL Slab and the NSL Slab. I recognise this area because of the shape of the barette in the middle of the photo and the pipe pile cutoff wall.

These details are clearly shown on a typical drawing of this area (produced and marked **Exhibit “EM-6”**). For ease of reference, I have produced a photo plan indicating the location where I consider that the photo was taken (produced and marked **Exhibit “EM-7”**);

- (b) The version of the photo that was disclosed by China Technology on 27 October 2018 includes metadata which states that the photo was taken on “Thursday, January 14, 2016 9:07 AM”;
- (c) The caption below the photo states that concrete was “still” not poured on “14 Jan”. Leighton’s team also took photos of the same area on 14 January 2016 (produced and marked **Exhibit “EM-8”**), which indicates that the pour was made later that day;
- (d) The fact that concrete was poured in Area A2 on 14 January 2016 is also confirmed by the concrete pour test results (produced and marked **Exhibit “EM-9”**). In particular, the “sample date” for the concrete pour in Area A2 is 14 January 2016; and
- (e) The caption below the photo suggests that it shows an area that is part of the “EWL”. This is incorrect. The photo shows the Air Duct Intermediate Slab of Area A2, which is not part of the EWL, and should not be confused with the area suggested by the caption (i.e. “Area A2 EWL”).

### **Response to the Second of Poon’s New Photos**

6. In response to the second of Poon’s New Photos (with the file name “C360\_2016-01-12-08-44-43-153.jpg”), I note that:

- (a) The photo appears to be NSL Slab Bay C1-3. For ease of reference, I have produced a photo plan indicating the location where I consider the photo was taken (**Exhibit “EM-7”**);
- (b) The version of the photo that was disclosed by China Technology on 27 October 2018 includes metadata which states that the photo was taken on “Tuesday, January 12, 2016 8:44 AM”;
- (c) The file name of the photo suggests it was taken on 12 January 2016. The photo shows that the steel reinforcement works were almost completed, which is consistent with the fact that concrete was poured for that area on 15 January 2016. This is confirmed by the concrete pour test results for that area (produced

and marked **Exhibit “EM-10”**). In particular, the “sample date” for the concrete pour was 15 January 2016; and

- (d) Leighton’s team took a photo of the same area on 15 January 2016, which also indicates that concrete was poured on that day (produced and marked **Exhibit “EM-11”**).

#### **Response to the Third of Poon’s New Photos**

7. In response to the third of Poon’s New Photos (with the file name “C360\_2016-01-12-08-25-09-383.jpg”), I note that:

- (a) The photo appears to be of Area B4 and B5 of EWL Slab. For ease of reference, I have produced a photo plan indicating the location where I consider that the photo was taken (**Exhibit “EM-7”**);
- (b) The version of the photo that was disclosed by China Technology on 27 October 2018 includes metadata which states that the photo was taken on “Tuesday, January 12, 2016 8:25 AM”;
- (c) The file name of the photo suggests that it was taken on 12 January 2016. The photo shows that concrete was being poured, which is consistent with the pouring date of 12 January 2016, as stated in the concrete pour test results for that area (produced and marked **Exhibit “EM-12”**);
- (d) The men wearing yellow helmets and blue shirts in the middle of the photograph appear to be China Technology’s workers. They appear to be operating the concrete vibrator that is used to agitate the concrete; and
- (e) Leighton’s team also took a photo of the same area on 12 January 2016, which also indicates that concrete was poured on that day (produced and marked **Exhibit “EM-13”**).

#### **Response to the Fourth of Poon’s New Photos**

8. In response to the third of Poon’s New Photos (with the file name “20160112\_090347.jpg”), I note that:

- (a) The photo appears to be of Area C, Bay C1-4 of EWL Slab. The staircase shown in this photo is in between Bay C1-4 and Bay C1-5. For ease of reference, I

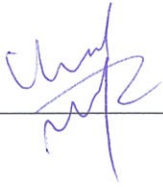


have produced a photo plan indicating the location where I consider that the photo was taken (**Exhibit “EM-7”**);

- (b) The version of the photo that was disclosed by China Technology on 27 October 2018 includes metadata which states that the photo was taken on “Tuesday, January 12, 2016 9:03 AM”; and
- (c) The file name of the photo suggests that it was taken on 12 January 2016. As noted in paragraph 7 above, concrete was being poured in Area B4 and B5 of EWL Slab on 12 January 2016. The concrete truck shown in the photo would have been involved in the concrete pour for Area B4 and B5.

Dated the 30 day of October 2018.

Signed: \_\_\_\_\_



Edward Mok