

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

3RD WITNESS STATEMENT OF MR. POON CHUK-HUNG, JASON

I, POON Chuk-hung, Jason of Suite A, 15/F, Kimberley House, 35 Kimberley Road, Tsim Sha Tsui, Kowloon, Hong Kong say this:-

1. I refer to the First Witness Statement and the supplemental witness statement dated 3rd September 2018 and 14th September 2018 of mine (“**the two witness statements**”). I am now giving a further supplemental witness statement to address certain important issues after having the opportunity of seeing and considering the electronic bundle which exceeds 50 Mbps. The submission of this witness statement may be considered by the Commission as late. However, in view of the voluminous information contained in the electronic bundle which took me considerable time in studying, I hope the Commission would grant its indulgence to accept the late submission of this witness statement. I believe the matters deposed herein are of great assistance to the Commission in conducting the Inquiry. I adopt all abbreviations and nomenclature in the First Witness Statement and the Second Witness.

G. The Water Leakage Incidents at the SCL North South Corridor in Feb 2018

2. After the Investigation set out in Section D of the First Witness Statement,

MTRC submitted the MTRC Report [B1/1-46] to the Highways Department in June 2018. Having considered all the information contained in the electronic bundles, I came to the view that at the time of submission of the MTRC Report in June 2018 MTRC knew or ought to know full well that the assurance given by Leighton so referred in the MTRC Report that *“the works on the Hung Hom Station and Stabling Sidings project were undertaken in strict accordance with its quality systems and the specifications of the contract”* and that *“the Works have been constructed in accordance with the Contract and statutory requirements”* are all false and unreliable. However, MTRC repeated such false and unreliable assurance of Leighton in the MTRC Report without disclosing the details of its discovery after the removal of portion of the concrete surface of the newly completed concrete structure at the SCL North South Corridor tunnel of Hung Hom Station in February 2018. At this juncture, I would like to stress that Chinat is not responsible for the construction of the concrete structure at the SCL North South Corridor tunnel of Hung Hom Station.

3. In March 2018 Oriental Daily reported that there was an incident of serious water leakage occurred in the Hung Hom Station Extension project. On 20 March MTRC caused a press release [B10 7638-7639] being published revealing that in August 2017 MTRC engineering staff spotted water seepage at the newly completed concrete connection joints of the SCL North South Corridor tunnel during a routine site inspection. According to the said press release, detailed inspection were carried out in February 2018, during which a portion of the concrete of the surface of the tunnel was removed, revealing that the workmanship of the reinforced concrete, including the steel bars, did not meeting the specifications and


required standard. Engineering staff inspected other similar concrete connection joints at the same works site and identified similar issues at two other locations within the 135-metre-long North Approach Tunnels. Unfortunately, MTRC failed to disclose the details of the non-conformity with specifications and standard of the reinforced concrete and steel bars work at the SCL North South Corridor tunnel so discovered in February 2018 in its press released and the MTRC Report submitted in June 2018.

4. It was only until after the submission of the MTRC report in June 2018 and the holding of the Legislative Council's Railway Subcommittee Meeting on 13 July 2018, which was attended by me and the MTRC's representatives Mr. Lee Tze Man and Mr. Wong Chi Chung [*Note : both of time have submitted their Witness Statements Items 14 [B1/154-166] and 15 [B1/167-180] of Bundle B1*], the details of the non-conformity with specifications and standard of the reinforced concrete and steel bars work discovered at the SCL North South Corridor tunnel were disclosed by MTRC. During the said meeting, Mr. Lee Tze Man and Mr. Wong Chi Chung revealed and confirmed that after removal of the concrete at location of water leakage at SCL North South Corridor tunnel in February 2018, it was discovered that steel bars have not been connected to couplers and in some cases the protection caps of couplers had not even been removed. The incident clearly showed that MTRC has right from the revelation of the scandal in March 2018 through media tried to suppress the shoddy construction work at Hung Hom Station Extension project and misled the public. As a matter of fact, MTRC knew and

ought to know full well since February 2018 that the assurance of Leighton repeatedly asserted by MTRC in the MTRC Report of June 2018 to the Highways Department is untrue and unreliable at all. Both Mr. Lee Tze Man and Mr. Wong Chi Chung also failed to disclose in their Witness Statements the facts as stated above.

H. The Identity of the Person appeared in Photograph


5. I understand that there might be dispute as to the identity of the persons appears in the photographs produced under paragraph 41 of the First Witness Statement [D1/10-41]. After making internal enquiry, I was told and confirmed by BUT Ho Yin Ian being the Assistant Foreman of Chinat, who was involved in SCL 1112, that the person in blue and red reflective shirts without reflective vest appear in the photograph ~~D1 4.2 [D226]~~ ^{D227} D601, D603 & D604 is 羅志強 and 呀東 respectively, who are workers employed by Leighton.


Oct 19, 2018

6. BUT Ho Yin Ian of Chinat is prepared to submit a short witness statement to verify the identities of the persons appear in the said photograph.

I believe that the facts stated in this witness statement are true.

Dated this the 11th day of October 2018.



(POON, Chuk-hung, Jason)