

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

5TH 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 four witness statements I provided to the Commission for the purpose of the Inquiry dated 3 September 2018, 14 September 2018, 11 October 2018 and 25 October 2018. I now give a further supplemental witness statement, 11 photographs and an isometric sketch to address certain issues concerning the carrying out of the Concrete Pour Plan under Project SCL1112.
2. I understand this witness statement, the photographs and the plan have not been provided to the Commission and other involved parties in the timeliest manner. Nevertheless, I believe that these materials could potentially be of great importance to this Inquiry.
3. Further, the photographs I wish to refer to in this witness statement have in fact been retrieved from the 21,718 photographs relating exclusively to Project SCL1112 on Chinat's Dropbox server. These are the same 21,718 photographs (included in the 40000 plus photographs in which there are duplicates and those taken from other projects) that I have previously presented to the police in support of my police witness statement dated 31 July 2018 (**Bundle D1, D829-831**), and that Chinat had applied to the Commission for them to be adduced on the first day of the Substantive Hearing on 22 October 2018. However, several parties casted doubt on the evidential value of the

photographs and objected to the application, thus the application was reluctantly withdrawn on the same day.

4. I hope the Commission would understand that my intention to adduce the photographs was all along to assist the Commission in this Inquiry. I therefore ask the Commission to grant its indulgence in accepting this witness statement and the exhibits referred to hereinbelow. I shall adopt all abbreviations and nomenclature in the previous witness statements.

Concrete-pouring procedure on 12 Jan 2016

5. On 12 January 2016, concrete was scheduled to be poured in Bays 4 and 5 of Area B in the EWL slab (“**Area B4&5**”). Next to it was Bay 5 of Area C1 (“**Area C1-5**”) and Bay 4 of Area C1 (“**Area C1-4**”) in the EWL slab. Area B of the EWL slab is the only area where I-beams were installed and is therefore easily distinguishable from other areas.
6. According to our ready-mixed concrete being supplied by Messrs EXCEL, the time of four technical stages in concrete-pouring were recorded in each delivery docket. They are:
 - The time at which water is added to a mixture of sand, OPC and quarry in the Batching Plant(s) therefore the chemical process of cementitious dehydration starts;
 - The time at which the concrete mixture is delivered to site at the concrete site test area by a Concrete Mixer Truck, at where Flow Table Test and Cube Test are accommodated;
 - The time at which the concrete mixture is starting to be discharged, either directly from a Concrete Mixer Truck, or separately by a Concrete Pump Truck; and
 - The time at which the discharge of concrete at that Concrete Mixer Truck is completed.
7. There is now produced and shown to me marked exhibit “**PCHJ-13**”, a delivery docket from EXCEL for the first batch of concrete mixture on 12 January 2016.

8. I refer to the first photo, **C360_2016-01-12-06-52-06-462 ("Photo 1")** taken at 0652 hours on 12 January 2016. I do not know which one among the Chinat staff took this photo. The person who took this photo was positioned in Area C1-5 facing Area B4&5, where the grey color I-beams are. When the photo was taken, concrete-pouring had not commenced. The photo shows a clear view of a yellow Concrete Pump Truck.
9. At about 0700 hours on 12 January 2016, the first batch of concrete mixture was poured in Area B4&5. I refer to the second photo, **C360_2016-01-12-07-03-49-307 ("Photo 2")**. With reference to the MTRC Site Diary on 12 January 2016 (**Bundle B5, SD7134**) the pouring in the entire Area B4&5 completed just before 2300 hours. I must emphasize every pouring of EWL Slab is not short, it took 16 hours on Area B4&5.
10. Although concrete was to be poured in Area B4&5, the discharge points are located in 3 different locations, first pump truck at HKC/Area B interfacing haul road, second pump truck at western half of Area C1-4 and C1-5, and a third point of direct discharge from the Concrete Mixer Trucks at the eastern half of Areas C1-4 and C1-5, where the concrete was pumped slowly and gradually filled up Area B4&5. Because of its thickness, concrete mixture initially tends to accumulate on the side closest to where it is being poured, forming an uneven surface. As more concrete mixture is poured, a levelled surface will be formed.
11. I refer to the third photo, **C360_2016-01-12-08-25-09-383 ("Photo 3")** taken at 0825 hours on 12 January 2016. I do not know which one among the Chinat staff took this photo. Two-thirds from the left-hand side of this photo depicts Area B4&5 (the area under the I-beams), whereas the remaining one-third on the right-hand side depicts Area C1-5 where two Concrete Mixer Trucks were stationed.
12. I refer to the fourth photo, **C360_2016-01-12-13-07-18-677 ("Photo 4")** taken at 1307 hours after lunch on 12 January 2016. I do not know which one among the Chinat staff took this photo. The person who took this photo was positioned in West Boundary of Area C1-5, facing Area B4&5, where the grey I-beams are. Even though the photo is not clear enough, we can still see the concrete is not yet covering the rebar at the time right after lunch hour in Area B & C interface.
13. It is important to note that concrete-pouring is a very slow process. I refer to the fifth photo, **C360_2016-01-12-18-05-10-025 ("Photo 5")** taken at 1805 on 12 January

2016 from western boundary of Area C1-5 towards Area B4&5. I do not know which one among the Chinat staff took this photo. In this photo, it can be seen that concrete was just being poured on the right-hand side of the photo, whereas the area on the left-hand side has not yet been poured and the steel bars were still fully exposed.

Track Slab Staircase Opening in Area C1-4

14. Between Areas C1-5 and C1-4, there is a track slab staircase opening of approximately 6 metres x 4 metres, there is a partially formed concrete staircase constructed. Through this opening, one is able to see the site conditions of the NSL slab right underneath the EWL slab at approx 10m displacement.
15. I refer to the sixth photo, **20160112_090347 ("Photo 6")** taken at 0903 hours on 12 January 2016, and the seventh photo, **C360_2016-01-12-09-04-01-559 ("Photo 7")** taken at 0904 hours on 12 January 2016. I do not know which one of the Chinat staff took this photo. The person(s) who took the photos was/were positioned in Area C1-4, facing southward to Areas C1-5 (where the Concrete Pump Truck was) and B4-5 (where the grey I-beams were). These photos clearly depict the track slab staircase opening mentioned above.
16. I also refer to the eighth photo, **C360_2016-01-12-08-44-43-153 ("Photo 8")** taken at 0844 hours on 12 January 2016. I do not know which one of the Chinat staff took this photo. This photo shows that, from the track slab staircase opening ~~in Area C1-4~~, one can have a very clear view of the rebar fixing conditions in Bay 3 of Area C1 of the NSL slab ("**NSL Area C1-3**").
17. Further, the ninth photo, **C360_2016-01-12-14-22-41-778 ("Photo 9")** taken at 1422 hours on 12 January 2016 is the NSL Area C1-3 [^]viewed on the same level. I do not know which one of the Chinat staff took this photo. However it is extremely clear that there were threaded bar being installed into the embedded couplers along the light blue color shear key on the diaphragm wall, while only bottom layers of rebar were laid.
18. Cross-referencing Photo 8, **C360_2016-01-11-09-48-26-209 ("Photo 10")** taken at 0948 hours on 11 January 2016, steel fixers working in NSL Area C1-3 [^]did not wear any specific uniform. In fact, they rarely wear any specific uniform. We further

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observed that most of the threaded bar connecting to the Diaphragm Wall's couplers are not been completed yet at this shear face in light blue color.

Area A2 falls under Chinat's scope of work in Project SCL1112

19. I understand that the EWL Track Slab Pour Plan (**Bundle B5, B2900**) on which the Commission, MTRC and Leighton have been heavily relying have excluded Area A2 on the EWL slab ("Area A2").
20. In Leighton's method statement for Area A – RC Structure Construction (NSL Track Level to EWL OTE Rook Level) (**Bundle B5, TS31277**), Area A2 is marked as the "Plenum & Staircase ST-35b" area directly connected to the Dwall of EWL Area A, we usually called the area northward to the East Diaphragm Wall as A1 while we group both Areas A1 and A2 together as Area A. The concrete-pouring work in Area A2 is indeed within the scope of work of Chinat under Project SCL1112. For that reason, Area A2 must not be omitted when we refer to construction works in EWL or NSL slab under Project SCL1112.
21. If one refers to the EWL slab, as opposed to confining it to the EWL track slab, the very last area in which concrete was poured was Area A2. We were still pouring it on 14 January 2016. I refer to the eleventh photo, **20160114_090748** ("Photo 11") taken at 0907 hours on 14 January 2016, showing Chinat's workers in blue shirts carrying out concrete-pouring works on the top right-hand corner. I refer also to the MTR Site Diary on 14 January 2016 (**Bundle B5, SD7153**), which shows that concrete-pouring works commenced at around 0700 hours to 2000 hours.

Metadata of the Photographs

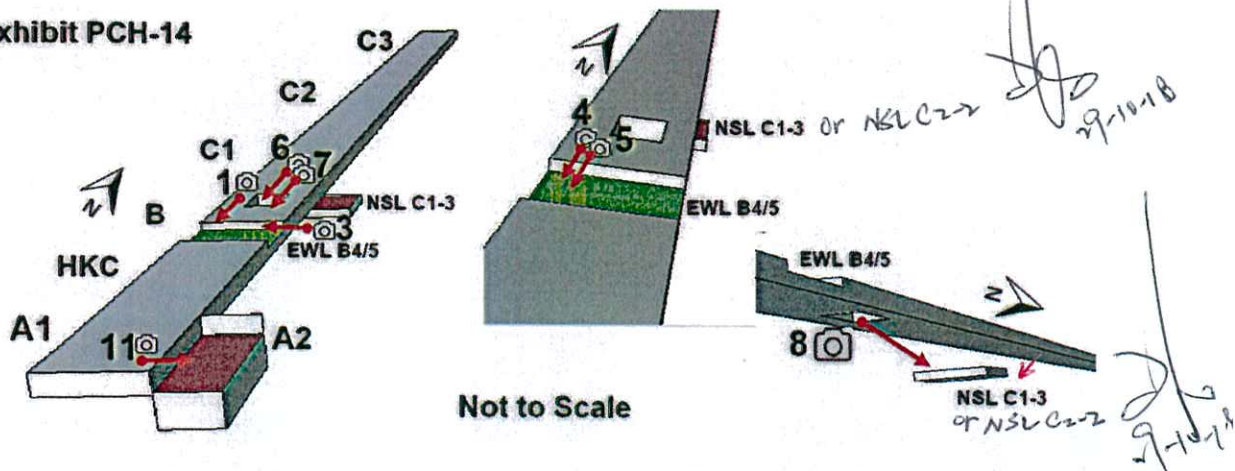
22. As requested by the Commission and other involved parties, I hereby provide the original digital file of the 11 Photographs mentioned above. To assist the Commission, I am also providing a table of the details of the Photographs as to which day and at what time they were taken, and the make and model of the device and the software used to take the Photographs.

Photo no. & file name	Date & time taken	Make & model of device	Software
Photo 1 C360_2016-01-12- 06-52-06-462	12/1/2016 06:52:07	Xiaomi, HM NOTE 1W	Camera360
Photo 2 C360_2016-01-12- 07-03-49-307	12/1/2016 07:03:49	Xiaomi, HM NOTE 1W	Camera360
Photo 3 C360_2016-01-12- 08-25-09-383	12/1/2016 08:25:09	Samsung, SM-N9200	Camera360
Photo 4 C360_2016-01-12- 13-07-18-677	12/1/2016 13:07:18	Xiaomi, HM NOTE 1W	Camera 360
Photo 5 C360_2016-01-12- 18-05-10-025	12/1/2016 18:05:10	Xiaomi, HM NOTE 1W	Camera360
Photo 6 20160112_090347	12/1/2016 09:03:47	Samsung, SM-N9200	N9200ZHU2AOKA
Photo 7 C360_2016-01-12- 09-04-01-559	12/1/2016 09:04:01	Samsung, SM-N9200	Camera360
Photo 8 C360_2016-01-12-	12/1/2016	Samsung,	Camera360

08-44-43-153	08:44:43	SM-N9200	
Photo 9	12/1/2016	Xiaomi,	Camera360
C360_2016-01-12-14-22-41-778	14:22:41	HM NOTE 1W	
Photo 10	11/1/2016	Xiaomi,	Camera360
C360_2016-01-11-09-48-26-209	09:48:26	HM NOTE 1W	
Photo 11	14/1/2016	Samsung,	N9200ZHU2AOKA
20160114_090748	09:07:48	SM-N9200	

23. I am now producing to be my knowledge marked exhibit “PCHJ-14” an isometric sketch (NTS) showing the directions and positions of most of the aforesaid 11 photos for your easy reference.


Exhibit PCH-14




24. If any party seeks to explore into the provenance of the Photographs, they are entitled to do so by accessing the metadata themselves upon receiving the original digital files. Nevertheless, to avoid any confusion arising from the provenance of the Photographs, I humbly invite the Commission to engage an independent expert to test the authenticity of all photographs I and other parties have sought to adduce for the purpose of this hearing.

25. We note hereby our submission of all original digital files of our photographs in D2/D1010~1016 dated 15-10-2018 upon demands. The Commission and all parties are free to assess the metadata by their own ways.

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


Dated this the 28th day of October 2018.


(POON Chuk-hung, Jason)