

**COMMISSION OF INQUIRY INTO THE CONSTRUCTION WORKS AT AND NEAR  
THE HUNG HOM STATION EXTENSION  
UNDER THE SHATIN TO CENTRAL LINK PROJECT**

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**WITNESS STATEMENT OF LEE CHIU YEE, JACKY  
FOR  
MTR CORPORATION LIMITED**

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I, **LEE CHIU YEE, JACKY**, of MTR Corporation Limited, MTR Headquarters Building, Telford Plaza, 33 Wai Yip Street, Kowloon Bay, Hong Kong, **WILL SAY AS FOLLOWS**

1. I am a Senior Construction Engineer- Civil (“**SConE**”) of MTR Corporation Limited (“**MTRCL**”) for the Shatin to Central Link Project (“**SCL Project**”). I am duly authorised by MTRCL to make this statement on its behalf.
2. I have a Bachelor Degree in Civil Engineering from the University of British Columbia and a Post-Graduate Diploma in Construction Project Management from the City University of Hong Kong. I have been a Registered Professional Engineer of the Engineers Registration Board of Hong Kong since July 2002 of the Hong Kong Institution of Engineers since March 2001.
3. I first joined MTRCL in May 2003 as Civil Engineer. Thereafter:
  - (1) Between May 2005 and February 2008, I worked on the East Rail Extension as a Civil Engineer;
  - (2) Between February 2008 and February 2011, I worked for the Operation Project Department; and
  - (3) Between February 2011 and March 2012, I worked on the Express Rail Link as Construction Engineer I - Civil (“**ConE**”).
4. Since June 2013, I have been the SConE for the SCL Project solely under Contract 1111. From or around April 2018 onwards, I have been a multi-contract SConE in the sense that in addition to my role in Contract 1111, I was also assigned to be responsible

for the works in other contracts of the SCL Project, including Contract 1112. Between April and July 2018, I was specifically tasked to manage the rectification works of the 3 Stitch Joints under Contract 1112. From July 2018 onwards, I have been responsible for the outstanding works (mainly Architectural Builder's Work and Finishes and general civil works) in NAT, SAT, HHS, and Concourse.

5. As a SConE for Contract 1111, I am responsible for supervising the ConE team reporting directly to me, which consisted of four ConEs I and four ConEs II. My ConE team and I were responsible for, amongst other things, excavation and lateral support works and reinforced concrete works in the NAT tunnel structure under Contract 1111.
6. More generally, I am responsible for everything construction-related. This includes implementation, environmental matters, planning, safety, review of various Gammon-Kaden Joint Venture ("GKJV") submissions, and the preparation of various MTRCL submissions to RDO/BD. I would often delegate to the ConEs in my team the task of reviewing these submissions, and upon my approval the submission would be passed to the Construction Manager for his final sign-off.
7. In summary, my role and responsibilities can be broken down generally into the following aspects:-
  - (1) Considering safety as the number one objective at all times.
  - (2) Managing safety issues arising on site to ensure that they are in compliance with the statutory and corporate requirements (e.g. the Project Health and Safety Manual).
  - (3) Supporting the contractor as much as possible to enable the works to be successfully implemented.
  - (4) Managing the works programme to monitor, to the extent possible, the critical dates in Contract 1111.
  - (5) Cost control of the works (i.e. preparation of Engineer's Instructions and the assessment of claim and Value Engineering proposals).
  - (6) Ensuring that the site works will not adversely affect the Operating Railway.

- (7) With respect to technical and quality issues, ensuring the works are in compliance with the working drawings and technical specifications.
  - (8) Considering the impact of the works on adjacent stakeholders and facilitating and supporting the stakeholder engagement activities being implemented on the SCL Project.
  - (9) Managing interface issues with Government departments, utilities companies and interfacing with designated contractors to ensure the smooth delivery of the SCL Project.
8. I am providing this witness statement in response to a letter dated 22 March 2019 in relation to NAT (“**NAT Letter**”) from Messrs. Lo & Lo, Solicitors, who I understand are the solicitors acting for the Commission of Inquiry into the Construction Works at and near the Hung Hom Station Extension under the Shatin to Central Link Project (“**Commission of Inquiry**”).
9. The matters raised in the NAT Letter which I will deal with in this witness statement are those listed as Request Item Nos. 1.12, 1.23.1, 1.23.2, and 2.11.
10. While I am aware of the matters raised in Request Item Nos. 1.12, 1.23.1, 1.23.2, and 2.11 of the NAT Letter based on my first-hand observations and personal involvement in the SCL Project since June 2013, and I confirm that this statement is true to the best of my knowledge and belief, there are occasions when I can only speak to matters by reference to MTRCL’s documents, in which case I believe the contents of the same to be true and accurate.

**Request No. 1.12 (in relation to the 3 Stitch Joints): Confirm whether MTRCL is satisfied that the mismatch and the use of wrong materials was not the fault of the contractor under Contract 1111 and give your reasons therefor.**

**Request No. 2.11 (in relation to the Shunt Neck Joint): Confirm whether MTRCL is satisfied that the mismatch and use of wrong materials was not the fault of the contractor under Contract 1111 and give your reasons therefor.**

11. I had no involvement in the original construction of the 3 Stitch Joints and the Shunt Neck Joint. This is because: (i) the NSL Stitch Joint within Contract 1112; and, (ii) the

NSL and EWL Stitch Joints and the Shunt Neck Joint at the Contract 1111/1112 interfacing locations (“**Interfacing Locations**”), were constructed under Contract 1112 in 2017 and I did not join Contract 1112 until April 2018.

12. The “Interfacing Requirements Specification Hung Hom North Approach Tunnels (Contract 1111) and Hung Hom Station and Stabling Sidings (Contract 1112)” (Appendix Z2 to the Particular Specification of Contract 1112) (the “**1111/1112 Interface Requirements Specification**”) sets out the respective responsibilities and obligations of the Contractor under Contract 1111, GKJV, and the Contractor under Contract 1112, Leighton Contractors (Asia) Limited (“**Leighton**”), in relation to the construction works in respect of the Interfacing Locations - namely the physical interface between the works of Contract 1111 and Contract 1112.
13. Clause Z1.6 of the 1111/1112 Interface Requirements Specification provides that:-
  - (1) *“Cofferdam wall installation at the interface will be completed by Contract 1111 ahead of the interfacing Contract 1112 works”;*
  - (2) *“Completion of the tunnel connections will be by Contract 1112”;* and
  - (3) *“Utilities crossing the interface will have connection points constructed by the first Contractor to occupy the area with connection made by the second Contractor.”*
14. Further, under Interface Item 1.4 of Table Z2.1.1 of the Interface Requirements Specification:-
  - (1) As the Contractor of Contract 1111, GKJV was required to complete the tunnel structure to enable the Contractor of Contract 1112, Leighton, to complete the stitching joint; and
  - (2) As the Contractor of Contract 1112, Leighton was required to complete the stitching joint, including the omega seal, rebar and infill concrete, after tunnel backfilling and stabilisation of tunnel settlement had occurred.
15. The NSL and EWL tunnel and Shunt Neck structures adjacent to the Interfacing Locations under Contract 1111 were constructed more than a year in advance of the commencement of construction for the interfacing joints under Contract 1112:-

- (1) The NSL tunnel structures adjacent to the Interfacing Location under Contract 1111 were completed in July 2015 with Lenton couplers with protective caps fixed at the interfacing end of the structures for Leighton's subsequent connection and the construction of the NSL Stitch Joint at the Interfacing Location did not commence until July 2017;
  - (2) The EWL tunnel structures adjacent to the Interfacing Location under Contract 1111 were completed in September 2015 with Lenton couplers with protective caps fixed at the interfacing end of the structures for Leighton's subsequent connection and the construction of the EWL Stitch Joint at the Interfacing Location did not commence until January 2017; and
  - (3) The Shunt Neck structures adjacent to the Interfacing Location under Contract 1111 were completed in January 2016 with Lenton couplers with protective caps fixed at the interfacing end of the structure for Leighton's subsequent connection and the construction of Shunt Neck Bay 3 under Contract 1112 (which consists of the Shunt Neck Joint) did not commence until January 2017.
16. Leighton was well aware at the material time of the materials used by GKJV at the Interfacing Locations. While I did not personally attend the Contract 1111/1112 Interface Meetings, I was briefed by Patrick Cheung (ConE I) and Hazel Lau (ConE II), both part of my ConE team under Contract 1111, after every meeting. I understood from the briefings by Patrick Cheung and/or Hazel Lau that GKJV's use of Lenton couplers at the Interfacing Locations was repeatedly discussed at the Interface Meetings held between 2014 and 2017, which were attended by representatives of MTRCL's Construction Management Teams under both Contract 1111 and Contract 1112, representatives of GKJV, and representatives of Leighton. I have been provided with the following Minutes of the Contract 1111/1112 Interface which are consistent with my understanding as obtained from Patrick Cheung and/or Hazel Lau:-
- (1) The 8<sup>th</sup> 1111/1112 Interface Meeting held on 5 December 2014;
  - (2) The 9<sup>th</sup> 1111/1112 Interface Meeting held on 9 January 2015;
  - (3) The 10<sup>th</sup> 1111/1112 Interface Meeting held on 6 February 2015;

- (4) The 11<sup>th</sup> 1111/1112 Interface Meeting held on 13 March 2015;
  - (5) The 12<sup>th</sup> 1111/1112 Interface Meeting held on 17 April 2015;
  - (6) The 14<sup>th</sup> 1111/1112 Interface Meeting held on 26 June 2015;
  - (7) The 15<sup>th</sup> 1111/1112 Interface Meeting held on 14 August 2015;
  - (8) The 16<sup>th</sup> 1111/1112 Interface Meeting held on 6 October 2015;
  - (9) The 17<sup>th</sup> 1111/1112 Interface Meeting held on 17 November 2015;
  - (10) The 18<sup>th</sup> 1111/1112 Interface Meeting held on 18 December 2015;
  - (11) The 19<sup>th</sup> 1111/1112 Interface Meeting held on 18 January 2016;
  - (12) The 20<sup>th</sup> 1111/1112 Interface Meeting held on 8 April 2016;
  - (13) The 21<sup>st</sup> 1111/1112 Interface Meeting held on 2 September 2016;
  - (14) The 22<sup>nd</sup> 1111/1112 Interface Meeting held on 6 January 2017.
17. Therefore, so far as I am concerned, Leighton was well aware at the material time of the materials used by GKJV at the Interfacing Locations, and, in particular, the use of Lenton couplers.
18. In any event, at no stage did I ever receive any complaint or notification from Leighton or otherwise that the works conducted by and the materials used by GKJV at the NSL and EWL tunnel and the Shunt Neck structures adjacent to the Interfacing Locations caused any issue in terms of the construction of the NSL and EWL Stitch Joints and the Shunt Neck Joint at the Interfacing Locations under Contract 1112.

**Request No. 1.23.1: The 1st and 2nd Stitch Joints Reports seek to explain and summarise the investigations carried out by MTRCL on the cause of the water seepages and the subsequent rectification works on the 3 Stitch Joints: Please elaborate and supplement the said reports if there are other matters which should be drawn to the Commission's attention and if there is any further development on the subject, and provide relevant records, documents and photographs in support.**

19. In or around April 2018, I was requested by Michael Fu (Construction Manager) to join Contract 1112 on a part-time basis to oversee the rectification works of the 3 Stitch Joints. I was responsible for supervising a team consisting of Ben Chan (ConE I), Albert Wan (SIOW), and Tony Tang (IOW) in the rectification works of the 3 Stitch Joints.
20. The rectification works for the 3 Stitch Joints took place between March and July 2018. The steps and procedures of the rectification works for the 3 Stitch Joints are described and explained in the following Method Statements. The ITP submitted by Leighton under the Method Statement for the permanent structure of NAT (“*NAT – Method Statement of Permanent Structure Construction of East West line (EWL) and North South Line (NSL) at North Approach Tunnel (NAT)*” (1112-CSF-LCA-CS-000673) dated 29 February 2016) also applied to the rectification works for the 3 Stitch Joints.

<b>Slab</b>	<b>Method Statement (CSF No.)</b>	<b>Paragraph Reference of the Method Statement</b>
EWL	1112-CSF-LCA-CS000922 (“ <b>EWL SJ Method Statement</b> ”)	2
NSL	1112-CSF-LCA-CS000918 (“ <b>1<sup>st</sup> NSL SJ Method Statement</b> ”)	2
NSL	1112-CSF-LCA-CS000940A <sup>1</sup> (“ <b>2<sup>nd</sup> NSL SJ Method Statement</b> ”)	2

21. Amongst other things, the Method Statements for the rectification works for the 3 Stitch Joints provide that:-

- (1) If the existing couplers were damaged during the breaking up works or otherwise could not be reused, holes would be drilled/cored for post-drilled rebar installation. The drilled/cored depth would depend on the rebar size in accordance with the Hilti’s calculations for the use of Hilti HIT-HY 200 Injectable Mortar (“**HY200**”) (EWL SJ Method Statement §2(17); 1<sup>st</sup> NSL SJ Method Statement §2.2.1.4, 3.2.2.3; 2<sup>nd</sup> NSL SJ Method Statement §§2.2.1.6, 2.2.2.5);

<sup>1</sup> This is a revised Method Statement for the NSL Stitch Joints addressing the construction of the roof of the Stitch Joints.

- (2) Rebar with couplers would be installed with HY200. At the Interfacing Locations, Lenton couplers would be used on Contract 1111's side and BOSA couplers would be used on Contract 1112's side (EWL SJ Method Statement §2(18); 1<sup>st</sup> NSL SJ Method Statement §2.2.1.5(a), 3.2.2.4(a); 2<sup>nd</sup> NSL SJ Method Statement §§2.2.1.7(a), 2.2.2.6(a)). Lapping rebars would be screwed into the newly installed couplers;
  - (3) If the existing couplers could be re-used, lapping rebars would be screwed directly into the existing couplers (EWL SJ Method Statement §2(17), (19); 1<sup>st</sup> NSL SJ Method Statement §2.2.1.5(b), 3.2.2.4(b); 2<sup>nd</sup> NSL SJ Method Statement §§2.2.1.7(b), 2.2.2.6(b)).
22. For the purpose of the rectification works of the 3 Stitch Joints, MTRCL submitted the following Quality Supervision Plans (“**QSP**”) for Lenton and BOSA respectively:-
- (1) By letter dated 22 March 2018 (1112-COR-DM(SCL)-STO-002109), MTRCL submitted to the RDO the QSP for BOSA Type II (32mm and 40mm diameter) and Lenton (32mm diameter) Mechanical Couplers; and
  - (2) By letter dated 26 March 2018 (1112-COR-DM(SCL)-STO-002111), MTRCL submitted to the RDO an updated version of the QSP for BOSA Type II (32mm and 40mm diameter) and Lenton (32mm diameter) Mechanical Couplers (the “**BOSA QSP**” and the “**Lenton QSP**” respectively);
23. Further, by letter dated 27 July 2018 (1112-COR-DM(SCL)-STO-002173), MTRCL submitted to the RDO the Quality Assurance Scheme for the Mechanical Coupler (BOSA Type II and Lenton) to be used in conjunction with the steel reinforcement bars for North Approach Tunnels (NSL & EWL).
24. The BOSA and Lenton QSPs provide, amongst other things, that:-
- (1) The same Technically Competent Persons (“**TCPs**”) proposed in the Site Supervision Plan for the works and submitted to the Buildings Department as stipulated in the Code of Practice for Site Supervision 2009 (“**CoP**”) [**B5/2676-2795**] shall be responsible for the quality control of the works (BOSA QSP §2; Lenton QSP §2);

(2) All on site threading works for BOSA threaded bars and Lenton threaded bars shall be undertaken by BOSA and Erico qualified threading technicians respectively. BOSA and Erico shall issue inspection records entitled “Thread Preparation Check Record” to the site together with the rebars with couplers and protective plastic caps. The quality control supervisors of the Registered Contractor shall be responsible to counter-check the said “Thread Preparation Check Record” after the material is available on site. A log book shall be kept at the site office for recording purposes and shall be available to officers of the Buildings Department for inspection (BOSA QSP §3; Lenton QSP §3);

(3) Quality control supervisors of the Registered Contractor shall be responsible to carry out full-time and continuous supervision of and the quality control supervisors of MTRCL shall be responsible to carry out supervision of more than 20% of the splicing assemblies. Both the quality control supervisors of the Registered Contractor and MTRCL respectively shall record the supervision and inspection in the prescribed inspection checklists of the BOSA QSP and the Lenton QSP (BOSA QSP§5; Lenton QSP §5).

25. By letter dated 22 March 2018 (1112-COR-DM(SCL)-STO-002107), MTRCL submitted to the RDO the updated Site Supervision Plan for the NSL and EWL Tunnels at the NAT area setting out the TCPs for site supervision (the “SSP”):-

**MTRCL**

<b>Grade</b>	<b>Name</b>	<b>Frequency Level of Site Inspection</b>
CP	Wong Jason Chi Chung	2 (Monthly visit)
CP Representative	Fu Michael Yin Chit	2 (Monthly visit)
T5 (Alternative)	Fu Michael Yin Chit	4.1 (Two visits every week)
T5	Ho James Ho Pong	4.1 (Two visits every week)
T3	Chan Ben Yiu Bun	4.3 (Four visits every week)

**Leighton**

<b>Grade</b>	<b>Name</b>	<b>Frequency Level of Site Inspection</b>
AS	Brewster, Raymond David	1 (When as necessary)

Representative	Holden, William	1 (When as necessary)
T4	Cheung Chi Wai	4.1 (Two visits every week)
T3	Wong, Hin Wai (Regina)	5 (Full time)
T1	Lii Hing Yu (Jeff)	5 (Full time)

26. I also set out below the subsequent changes in the TCPs for site supervision:-

#### **MTRCL**

Original TCP	New TCP	Grade	Effective Date
Ho James Ho Pong	Myself	T5	20 August 2018

(see letter from MTRCL to RDO dated 21 August 2018 (1112-COR-DM(SCLC)-STO-000044))

#### **Leighton**

Original TCP	New TCP	Grade	Effective Date
Cheung Chi Wai	Holden, William	T4	2 June 2018
Wong Hin Wai (Regina)	Cheung Chi Wai	T3	2 June 2018
-	Fung Chun Yin (Sydney)	T3 (Alternative)	2 June 2018
Lii Hing Yu (Jeff)	Lai Ka Ho (Henry)	T1	1 May 2018

(see letter from MTRCL to RDO dated 14 June 2018 (1112-COR-DM(SCL)-STO-002154))

27. Based on the Pour Summary for NAT prepared by MTRCL's Projects Team by reference to the Site Diaries and site photos, the rebar fixing and the concreting works for the rectification of the 3 Stitch Joints took place on the following dates:-

	Commencement of Rebar Fixing	Completion of Rebar Fixing	Concrete Pour
NSL Stitch Joint 1112/1111- Track slab	12 April 2018	13 April 2018	14 April 2018
NSL Stitch Joint 1112/1111- Downtrack wall	16 April 2018	17 April 2018	18 April 2018
NSL Stitch Joint 1112/1111-	17 April 2018	18 April 2018	19 April 2018

Uptrack wall and mid. wall			
NSL Stitch Joint 1112/1111- Roof	15 May 2018	16 May 2018	19 May 2018
NSL Stitch Joint 1112 -Track slab	9 May 2018	12 May 2018	14 May 2018
NSL Stitch Joint 1112 -Wall	16 May 2018	22 May 2018	24 May 2018
NSL Stitch Joint 1112 -Roof	25 May 2018	27 May 2018	18 July 2018
EWL Stitch Joint- 1112/1111- Track Slab	24 March 2018	27 March 2018	28 March 2018
EWL Stitch Joint 1112/1111- East & West Wall	29 March 2018	29 March 2018	4 April 2018

28. As set out below, the inspections for the rebar fixing and concreting works for the rectification of the 3 Stitch Joints were duly carried out. Records of such inspections were prepared at the material time and properly kept by my team.

29. Pursuant to the BOSA and Lenton QSPs:-

(1) The “Thread Preparation Check Records” of the threaded rebars used for the rectification works of the 3 Stitch Joints were duly counter-checked and counter-signed by MTRCL’s and Leighton’s respective quality control supervisors, a complete set of which I understand will be included in the documents disclosed by MTRCL to the Commission of Inquiry.

(2) The supervision and inspection of the splicing assemblies for the rectification works of the 3 Stitch Joints were duly carried out and recorded in the coupler checklists prescribed respectively by the BOSA and Lenton QSPs, and signed by MTRCL’s and Leighton’s respective quality control supervisors, a complete set of which I understand will be included in the documents disclosed by MTRCL to the Commission of Inquiry.

30. The hold point inspections and approvals for rebar fixing and the pre-pour check of the rectification works for the 3 Stitch Joints were also comprehensively recorded in the following RISC Forms:-

	<b>Rebar fixing RISC form</b>	<b>Pre-pour check RISC form</b>
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NSL Stitch Joint 1112/1111-Track slab	1112-CIV-012728 (Bottom Rebar) 1112-CIV-012740 (Top Rebar)	1112-CIV-012741
NSL Stitch Joint 1112/1111-Downtrack wall	1112-CIV-012743	1112-CIV-012744
NSL Stitch Joint 1112/1111-Uptrack wall and mid. wall	1112-CIV-012757	1112-CIV-012760
NSL Stitch Joint 1112/1111-Roof	1112-CIV-012832	1112-CIV-012834
NSL Stitch Joint 1112- Track slab	1112-CIV-012830	1112-CIV-012831
NSL Stitch Joint 1112- Wall	1112-CIV-012875	1112-CIV-012837
NSL Stitch Joint 1112- Roof	1112-CIV-012978 (Top Rebar) 1112-CIV-012980 (Bottom Rebar)	1112-CIV-013029
EWL Stitch Joint- 1112/1111-Track Slab	1112-CIV-012595 (Bottom Rebar) 1112-CIV-012647 (Top Rebar)	1112-CIV-012648
EWL Stitch Joint 1112/1111-East & West Wall	1112-CIV-012709	1112-CIV-012718

31. Further, site photos were taken by the inspectorate team during the abovementioned inspections. I understand that a set of such photos will be included in the documents disclosed by MTRCL to the Commission of Inquiry.
32. In addition to the above-mentioned inspections carried out for the rectification works of the 3 Stitch Joints by the full-time engineering and inspectorate staff of MTRCL and Leighton under Contract 1112, a complete set of records of which has been properly kept. Further, a separate and independent quality control team, who directly reported to Aidan Rooney (General Manager - SCL Civil - NSL at the time) and I was not part of, was deployed to conduct further inspections to ensure that all rectification works were carried out to MTRCL's satisfaction.
33. By letter dated 15 February 2019 (1112-COR-DM(SCL)-STO-002227), Andy Leung (Design Manager) on behalf of MTRCL submitted to the RDO the Report on 8<sup>th</sup> Design Amendment for NAT Tunnel Structures (NSL, Tunnel, EWL Tunnel Stitch Joint Remedial Details) (Deliverable No. 3.13B), which included the as-built locations of the stitch joint drill-in bars. In particular, Appendix G of the said Design Report contained as-built records of drill-in holes and reused couplers. While I had no involvement in the

preparation of the said Design Report, the Construction Management team and I assisted in the preparation of such as-built records.

34. I understand that, by letter dated 4 April 2019 (HYD RDO/16-3/13/19/1/1112(S)), RDO responded to the Design Submission mentioned at paragraph 33 above.

**Request No. 1.23.2: By HyD's letter dated 1 March 2019, there was suggestion that water seepage had recurred at the 3 Stitch Joints, please explain why, notwithstanding the rectification works, water seepage has persisted. Describe and explain the cause of the repeated water seepage and the steps taken to investigate and rectify the defects.**

35. On or around 15 February 2019, Tony Tang informed me via WhatsApp that he had discovered water seepage at the 3 Stitch Joints during his daily surveillance operations. On the same day, Michael Fu issued an e-mail to Leighton informing them of water leakage at the rectified Stitch Joints. Between 15 and 28 February 2019 (I cannot now remember the precise date), I went on site to conduct an inspection of the 3 Stitch Joints and observed minor water seepage at various locations.
36. On 1 March 2019, I conducted a site visit with Tony Tang and representatives of RDO, and minor water seepage was observed at the 3 Stitch Joints. By a letter issued on the same day (HYD RDO/16-3/13/8/2C), RDO requested MTRCL to take immediate action to rectify the water seepage.
37. Between 1 and 20 March 2019, I liaised with Leighton on the arrangement and logistics of the necessary rectification works to address the water seepage. Leighton's proposed repairing method was approved in principle on 18 March 2019.
38. On 20 March 2019, I instructed Tony Tang (IOW) to conduct a joint inspection with Man Sze Ho (Assistant Engineer of Leighton) of the 3 Stitch Joints to identify all water seepage locations. On the same day, Tony Tang reported to me via WhatsApp that 16 water seepage locations were identified and that he had requested Man Sze Ho to carry out rectification works. Subsequently, Leighton instructed Merman Technology Company Limited to conduct grout injection at the water seepage locations.
39. I understand that Tony Tang has provided a witness statement for the Commission of Inquiry detailing the inspections that he conducted for the water seepage issue at the 3

Stitch Joints in 2019 and the most up-to-date conditions of the 3 Stitch Joints, which are documented in the form of RISC forms and photos. I shall leave this to be dealt with by Tony Tang.

40. Finally, I would like to mention the following:-

- (1) The events in question and which form the subject matter of the Commission of Inquiry took place several years ago and my recollection of every detail is not therefore perfect.
- (2) Accordingly, in preparing this witness statement I have reminded myself of the events in question by reference to various hard copy and electronic documents and materials. I understand these materials were retrieved by MTRCL's Legal Department, with the assistance with MTRCL's external lawyers, Mayer Brown.

**Dated 3 May 2019**



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**LEE CHIU YEE, JACKY**

**COMMISSION OF INQUIRY INTO THE CONSTRUCTION WORKS AT  
AND NEAR THE HUNG HOM STATION EXTENSION UNDER THE  
SHATIN TO CENTRAL LINK PROJECT**

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**Corrigendum to the Witness Statement of Lee Chiu Yee Jacky  
dated 3 May 2019**

<b>Page</b>	<b>Paragraph</b>	<b>Content</b>
BB96	15(3)	Replace "...Lenton couplers..." with "...Lenton <b><i>and Bosa</i></b> couplers..."
BB98	20	Replace "...( <i>1112-CSF-LCA-CS-000673</i> ) dated 29 February 2016..." with "...( <i>1112-CSF-LCA-CS-000673A</i> ) dated <b><i>10 May 2016</i></b> ..."
BB98	20	Replace "... <i>1112-CSF-LCA-CS000918</i> ..." with "... <i>1112-CSF-LCA-CS000921</i> ..."
BB98-99	21	Replace " <i>1<sup>st</sup> NSL SJ Method Statement §2.2.1.4, 3.2.2.3</i> " with " <i>1<sup>st</sup> NSL SJ Method Statement §§2.2.1.4, 2.2.2.4</i> "  Replace " <i>1<sup>st</sup> NSL SJ Method Statement §2.2.1.5(a), 3.2.2.4(a)</i> " with " <i>1<sup>st</sup> NSL SJ Method Statement §§2.2.1.5(a), 2.2.2.5(a)</i> "  Replace " <i>1<sup>st</sup> NSL SJ Method Statement §2.2.1.5(b), 3.2.2.4(b)</i> " with " <i>1<sup>st</sup> NSL SJ Method Statement §§2.2.1.5(b), 2.2.2.5(b)</i> "
BB104	35	Replace "... <i>Tony Tang informed me via WhatsApp that he had discovered water seepage at the 3 Stitch Joints...I went on site to conduct an inspection of the 3 Stitch Joints...</i> " with "... <i>Tony Tang informed me via WhatsApp that he had discovered water seepage at the <b>2 NSL</b> Stitch Joints ... I went on site to conduct an inspection of the <b>2 NSL</b> Stitch Joints...</i> "
BB104	36	Replace "... <i>minor water seepage was observed at the 3 Stitch Joints...</i> " with "... <i>minor water seepage was observed at the <b>2 NSL</b> Stitch Joints...</i> "
BB104	38	Replace "... <i>I instructed Tony Tang (IOW) to conduct a joint inspection with Man Sze Ho (Assistant Engineer of Leighton) of the 3 Stitch Joints...</i> " with "... <i>I instructed Tony Tang (IOW) to conduct a joint inspection with Man Sze Ho (Assistant Engineer of Leighton) of the <b>2 NSL</b> Stitch Joints...</i> "

BB104	39	Replace “... <i>the inspections that he conducted for the water seepage issue at the 3 Stitch Joints in 2019 and the most up-to-date conditions of the 3 Stitch Joints....</i> ” with “... <i>the inspections that he conducted for the water seepage issue at the <u>2 NSL</u> Stitch Joints in 2019 and the most up-to-date conditions of the <u>2 NSL</u> Stitch Joints...</i> ”
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