

**Commission of Inquiry into the Construction Works at and near the Hung Hom Station
Extension under the Shatin to Central Link Project**

WITNESS STATEMENT OF JIM WONG

I, **JIM WONG** of [REDACTED], will say as follows:

1. I was, at the times relevant to this statement, a Senior Site Agent employed by Leighton Contractors (Asia) Limited (“**Leighton**”), the main contractor for the Hung Hom Station Extension contract (Contract SCL 1112) (the “**Project**”) under the Shatin-Central rail link project. The project manager for the Project is MTR Corporation Limited (“**MTRCL**”).
2. 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, information and belief.

My role and responsibilities

3. I first joined the Project in October 2014 as a Senior Site Agent and I was responsible for the North Approach Tunnels area (“**NAT**”) until November 2016, when I was re-assigned to another area of the Project. Throughout that time, I reported to Joe Tam, the Construction Manager for NAT at the time. I was promoted to Construction Manager for Concourse in 2017 and remain as a Construction Manager for the Project as at the date of this statement.

Interface meeting for the Project and SCL 1111

4. I recall starting to attend the regular interface meetings (“**Interface Meetings**”) between Leighton and Gammon Kaden JV (“**GKJV**”), the main contractor for the Hung Hom North Approach Tunnels contract (Contract SCL 1111) (“**SCL 1111**”), after Johnny Leung, (Site Agent working on NAT) left the NAT in late 2014 / early 2015. Regina Wong, (Sub-Agent working under my supervision) would attend the Interface Meetings together with me.

5. GKJV and Leighton would take turns to take the minutes for the Interface Meetings and circulate it to the other parties in attendance. When I attended an Interface Meeting and Leighton was responsible for preparing the minutes, I would prepare the meeting minutes with assistance from Regina Wong.
6. We would first circulate the draft minutes to Chris Chan or Kappa Kang, the MTRCL's construction engineers, who attended the Interface Meeting and have him review the draft before circulating it to other parties via an email chain. The email chain would usually consist of all attendees. I would also receive meeting minutes prepared by GKJV from this email chain.
7. According to my record, the following team members of Leighton have received the minutes to the Interface Meetings, but I cannot locate records showing that the minutes to the Interface Meeting No.19 were sent to other team members of Leighton:

Interface Meeting No.	Email recipients of the minutes
9	Ian Rawsthorne, T C Kan, Joe Tam, Regina Wong, Brett Buckland, Betty Ng, Javier Li, Jim Wong
11	Regina Wong, Jim Wong
12	<u>Chan</u> Hon Sun, Regina Wong, Jim Wong
13	<u>Chan</u> Hon Sun, Regina Wong, Jim Wong
14	Regina Wong, Jim Wong
15	<u>Chan</u> Hon Sun, Regina Wong, Joe Tam, Brett Buckland, Javier Li, Henry Chan, Jim Wong
16	Regina Wong, Joe Tam, Jim Wong
17	Regina Wong, Jim Wong
18	Regina Wong, Jim Wong
20	Regina Wong, Jim Wong
21	Regina Wong, Jim Wong

8. Apart from email distribution, I note from the letter dated 9 April 2015 from GKJV [CC2/755] that the minutes to the Interface Meetings held on 5 December 2014 (No.8) [CC2/756-766] and 6 February 2015 (No.10) [CC2/767-771] were enclosed with the letter, and that the meeting minutes was sent to T C Kan (Leighton) and circulated to

Joe Tam (Leighton) and me. I remember receiving those minutes (although I cannot recall whether I received them under the cover of that letter or by other means). I also cannot recall whether I have forwarded the meeting minutes to other team members of Leighton.

9. I understand that the minutes to the Interface Meetings might also have been circulated via the Contractor Submission Form (CSF) early on or through MTRCL's ePMS system, although I do not recall submitting or receiving meeting minutes through those means.
10. When the matters raised during the Interface Meetings concern other team members of Leighton and require their further action, normally I would forward the relevant meeting minutes to them.
11. I would also discuss with the relevant team members working under my supervision or have individual conversations with them, usually at the site office, if any matters raised during the Interface Meeting had to be addressed and dealt with by my team member(s) at the time. Depending on the nature and complexity of the matter, I would follow up with the team regarding the progress and status of the matter discussed during those informal "meetings", but I do not have records of those discussions.

Use of LENTON couplers and other issues and matters raised in Interface Meetings

12. I note that it was recorded in the minutes to the Interface Meeting held on 5 December 2014 (No.8) [CC2/757] (which I did not attend) that "*GKJV tabled three proposed material submissions which would be used in the structure at the interfaced location for 1112 reference during meeting no.7 ... Mechanical splicing system of rebar (ref. 1111-MSF-GKJ-CS-00808A), Re-submission*".
13. At the time, I was aware of the possibility that couplers other than BOSA brand couplers might be necessary for the stitch joint interface, as GKJV might have used another brand of couplers. However, it was not brought to my attention that GKJV set out in their Contractor's Materials Related Submission Form (CSF No.: 1111-MSF-GKJ-CS-000808; appended to the 5 December 2014 Interface Meeting minutes) [CC2/763] that LENTON brand couplers were proposed to be used in the construction of SCL 1111's section of the tunnel. I therefore did not know that LENTON brand couplers would be used at the stitch joint interface.

14. GKJV clarified their earlier proposed materials submission in relation to the use of couplers in the Interface Meeting held on 18 January 2016 (No.19). It was recorded in the minutes [CC2/849] that *“The following material GKJV tabled three proposed material submissions which would be used at 1111/1112 in the interface boundary advised by GKJV in previous interface meeting structure at the interfaced location for 1112 reference during meeting no. 7. (cover page of those submissions were attached in MoM no. 8); ... Mechanical Splicing System of rebar (ref. 1111-MSF-GKJ-CS-000832). -T40 coupler is BOSA; others are Lenton - Approved ... GKJV advised the coupler for T40 is BOSA; others are Lenton.”*. In February 2016 I received from GKJV the relevant drawings for SCL 1111 showing the details of the stitch joints at the interface; therefore, I knew that LENTON brand couplers would be used in the construction of SCL 1111’s section at the stitch joint interface.
15. However, since the construction of the stitch joints would not start soon at the time of this clarification from GKJV in January 2016 (and the stitch joints construction did not in fact start before I left NAT in November 2016), the issues regarding the use and compatibility of couplers did not require further action from or to be addressed and dealt with by other team members of Leighton at the time of this clarification.
16. Furthermore, my priority at the time was to attend to other urgent/ongoing tasks in NAT, therefore I cannot recall having discussed with other team members of Leighton on GKJV’s clarification regarding the use of couplers, when this was not a time-critical matter at the time.
17. I cannot remember if I mentioned this matter in relation to the use of couplers to the engineers on Leighton’s engineering construction team, before I left NAT and was re-assigned to another area of the Project (prior to the construction of the stitch joints). A handover regarding the Interface Meetings was not required, because the Interface Meetings were still ongoing at the time when I left NAT.

Dated the 25 day of May 2019.

Signed: 

Jim Wong