

**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 JOHNNY LEUNG

I, **JOHNNY LEUNG** of [REDACTED],
[REDACTED], will say as follows:

1. I was, at the times relevant to this statement, a 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 joined Leighton in May 2013 as a Site Agent for the Project and I left Leighton in May 2015. During my time on the Project, I worked in the area of the North Approach Tunnels ("**NAT**"), apart from the last 6 months or so when I worked in the Stable Sidings area ("**HHS**"). I was mainly responsible for the underground utilities diversion.

Interface meeting for the Project and SCL 1111

4. I note the minutes of the interface meetings nos.2, 7 and 8 between Leighton and Gammon Kaden JV ("**GKJV**"), the main contractor for the Hung Hom North Approach Tunnels contract (Contract SCL 1111) on 7 February 2014 [**CC2/739-749**], 8 November 2014 [**CC2/750-754**] and 5 December 2014 [**CC2/756-766**] respectively. I recall from those minutes that I attended those interface meetings.

5. I remember receiving minutes of the interface meetings by email, but I cannot remember who else received those emails. I note in the minutes of the interface meeting no.2 that “*the agreed meeting notes would be distributed through ePMS*” [CC2/740], however I cannot recall receiving meeting minutes via that means.

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

6. When issues and matters were raised in the interface meetings, if they were my responsibility, I would handle them. I would not deal with matters for which I was not responsible, because I believe that my colleague T C Kan would handle them (including relaying them to other colleagues responsible), and that the items retained in the meeting minutes would be dealt with later on when necessary.
7. I note in the minutes of the interface meeting no.7 that there is an item “*Mechanical Splicing System of rebar*” [CC2/752], but I cannot remember any detailed discussion about couplers during that meeting. However, I remember the other item “*Waterproofing system*” was discussed, because I knew the relevant company.
8. I note in the minutes of the interface meeting no.8 that there is an item “*Mechanical Splicing System of rebar (ref. 1111-MSF-GKJ-CS-000808A), Re-submission*” [CC2/757], but I have no recollection as to what exactly was discussed at the time. I was not sure which brand of couplers would be used in the construction of the Project’s section of the stitch joints at the time, because none of the structural works had started yet.
9. I cannot remember whether I knew that LENTON brand couplers would be used at the stitch joint interface. I also do not know who else in Leighton would know about that at the time.

10. Since no structural works had started at the time, Leighton's NAT site team did not have quality assurance team and site agent responsible for the relevant structural works (and I was the Site Agent in the NAT responsible for underground utilities work). Therefore, there was no one responsible for the compatibility regarding couplers and rebar at the time.

Dated the 25th day of May 2019.

Signed:

Johnny Leung