

COMMISSION OF INQUIRY INTO THE DIAPHRAGM WALL AND
PLATFORM SLAB CONSTRUCTION WORKS AT THE HUNG HOM STATION
EXTENSION UNDER THE SHATIN TO CENTRAL LINK PROJECT
APPOINTED PURSUANT TO SECTION 2 OF THE COMMISSION OF INQUIRY
ORDINANCE (CHAPTER 86) ON 10 JULY 2018

WITNESS STATEMENT OF FAN TAK PUN

I, FAN TAK PUN, also known as Patrick FAN, Structural Engineer/Railway Development 2, Kowloon and Rail Section, New Buildings Division 2, Buildings Department, 8/F Cityplaza Three, 14 Taikoo Wan Road, Taikoo Shing, Hong Kong, do say as follows:-

1. I am a Structural Engineer in the Buildings Department (“**BD**”) and have been seconded to the Railway Development Office (“**RDO**”) of the Highways Department (“**HyD**”) for this position since 2 May 2018.

2. I am a member of the Hong Kong Institution of Engineers and Registered Professional Engineer, Hong Kong. I joined BD in 2007.

3. I make this Witness Statement on behalf of the Building Authority (“**BA**”) pursuant to paragraph 10 of the Rules of Procedure and Practice made at the Preliminary Hearing on 24 September 2018. Save where otherwise appears, the facts deposed hereto are within my personal knowledge or are derived from office files and records and sources to which I have access and are true to the best of my knowledge, information and belief. Save as otherwise specified, this Statement adopts the same abbreviations and nomenclature as in the other statements served by the BA/BD for the present inquiry.

4. This Witness Statement is made in response to paragraph 40 of Mr. Ma Ming Ching Derek’s Witness Statement [**B1/B367**] where it was stated that the coupler checklists prepared by MTRCL retrospectively were shown to BD’s representatives during the site visits in June 2018.

5. Under the instruction of my superior, Senior Structural Engineer Mr. Lok Pui Fai, together with other colleagues from BD, RDO and Pypun, I visited MTRCL’s temporary site office at HUH Extension on 6 June, 25 June and 29 June 2018. I refer the Commission to my police statement dated 7

August 2018 for details of these site visits [H14/ H35093- H35173]. In this Witness Statement, I will only highlight a few points regarding the site visits conducted in June 2018.

6. During the visit on 6 June 2018, we mainly requested for and reviewed the following types of documents:

- (1) Inspection Forms/Records of both the contractor and MTRCL; and
- (2) the Quality Supervision Report in respect of coupler installation (“QSR”).

7. On that day, I attended MTRCL’s Site Office with Simon Ho and Jerry Chan of Pypun-KD & Associates Ltd (“Pypun”), James Fung of HyD. We were assisted by Ben Chan (Construction Engineer) of MTRCL. I requested to review and collect the documents as mentioned in paragraph 6 above and Ben Chan presented a large amount of documents to me. Most of the documents were inspection records prepared by Leighton such as “Request for Inspection/Survey Check (“RISC”) form, demarcation plan for construction bay of EWL slab showing the dates of concreting for various parts of EWL slab. Representative from MTRCL told us they were unable to photocopy all documents. We therefore selected several site documents as samples and MTRCL staff photocopied the sample documents for us [H14/35117-35130].

8. Then, MTRCL provided other Leighton’s inspection records of mechanical coupler installation (i.e. coupler checklists) for our viewing. We requested for photocopies of those documents, it was however refused by MTRCL’s staff. My colleague, Mr. WONG Wing-wah, therefore used his mobile phone to take photos of some of the documents related to coupler installation for record [H14/35131-35164].

9. On the basis of the documents made available to us, we tried to work out how they were prepared (including the sequence of different documents). At the same time, we also requested MTRCL staff to explain the purpose of those documents. I refer to paragraph 10 of my police statement for the explanation provided by MTRCL [H14/H35095]. Amongst the documents provided by MTRCL, there was a group of documents called “Checklist for recording on-site assembly of EWL Slab to D-wall/Slab Couplers” [H14/35136].

10. Besides, we also requested MTRCL to provide its own documents including QSR. MTRCL then represented a document (which is now contained in **H14/35151**) entitled “1112 Coupler Installation checklist” and said the document was a supervision checklist of “Mechanical Couplers” from the Competent Person. At that time, we were not told by anyone from MTRCL that these coupler check lists were actually retrospective records. The document was signed by Kobe Wong and suggests that there were formal inspection records for the period from 3 August 2015 to 11 January 2016 [**H14/35151**]. However, this document does not show the dates of signing such records and could not prove that they were contemporaneous records of satisfactory inspection of the works concerned. As such, we did not accept the records and requested MTRCL to provide further documents for checking. Another date was proposed to check all the documents. On 7 June 2018, based on the materials gathered on 6 June 2018 and the checking ‘results’, I prepared a file record in BD file under reference BD RAIL/30SCL/02-1112(S)-Pt.21 [**H14/35115**].

11. Subsequently, my superior, Senior Structural Engineer of the Buildings Department Mr. LOK Pui-fai, asked me to visit MTRCL’s site office with other colleagues from 25 to 29 June 2018 and continue to check relevant documents so as to ascertain and verify the number of “Mechanical Couplers” used in the whole EWL slab of HUH Extension.

12. As per the instruction of Mr. Lok, I returned to MTRCL’s site office on 25 June 2018. In the morning of 25 June 2018, I, WONG Wing-wah, Jerry CHAN from Pypun and James Fung from RDO visited the temporary site office of HUH Extension. MTRCL representative Ben Chan was met. We started to check all documents involving the use of “Mechanical Couplers” (including “Checklist for on-site Assembly of EWL Slab to D-wall / SLAB couplers”) to calculate the number of “Mechanical Couplers” used. MTRCL likewise said that they could not provide copies of the documents to the BD at that stage so we carried out the calculation at the office. Owing to the time needed to check the large amount of documents, we left the office at 6 pm that day and continued our work on the following day. I had other duties from 26 to 28 June 2018, I was not able to resume the checking work until 29 June 2018.

13. In the morning of 29 June 2018, I, together with Jerry CHAN (of Pypun) and James FUNG (of RDO), went to MTRCL's temporary site office for SCL HUH Extension again. On that occasion, we were received by Ben Chan of MTRCL at the site office. Based on the documents presented by MTRCL and reviewed by various team members during the earlier inspection from 25 to 28 June 2018, it was found that only around 19,000 nos. of "Mechanical Couplers" had been used in the whole EWL slab of HUH Extension project. However, according to MTRCL's report dated 15 June 2018, around 23,000 "Mechanical Couplers" ought to have been used in the "SCL – Hung Hom Station". MTRCL replied that part of the "Mechanical Couplers" were used in connecting capping beam/Slab. After subsequent checking of Leighton's coupler checklists (which are in the same format as that shown in **H14/H35136** for example) by James, Jerry & me in the site office, our final calculation showed that additional 3,935 nos. of "Mechanical Couplers" were used at the capping beams making a total of 23,516, which is consistent with the number stated in MTRCL's report.

14. In the afternoon of 29 June 2018, I returned to my office at the Buildings Department and prepared a BD file record based on the materials gathered during my site visits on 25 June and 29 June 2018 and the checking 'results' obtained. I recorded in M24 the total number of couplers of 3,935 used at the Capping beam/Slab connection [**H14/35165**]. I also attached the 8 photos taken by WONG Wing-wah on 25 June 2018 [**H14/35166-35173**] and filed them in BD file with the reference: BD RAIL/30SCL/02-1112(S)-Pt.21.

15. I confirm that the contents of this Witness Statement and those recorded in my police statement dated 7 August 2018 [**H14/35093-35173**] are true and correct to the best of my knowledge, information and belief.

Dated this 18th day of October 2018



FAN TAK PUN
Structural Engineer
Buildings Department