

**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 REGINA WONG

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

1. I was, at the times relevant to this statement, a Sub-Agent (later promoted to 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 Sub-Agent and I worked at the area of the North Approach Tunnels (“**NAT**”) until February 2017, when I was moved to another Leighton construction project. I was mainly responsible for the North Fan Area (“**NFA**”) of the NAT during my time on the Project, but my work also touched on other areas of the NAT, especially in the initial stages of the construction at the NFA. I was promoted to Site Agent in early 2016 and throughout that time, I reported to Jim Wong, the Senior Site Agent for NAT at the time.
4. I also worked on the Project from November 2017 to December 2018 (except between June and July 2018 when I was temporarily working in the Tender Team at Leighton’s Head Office). During that time, I worked on the Stable Sidings area (“**HHS**”) and remedial work for the stitch joints at the interface between the Project and the area under Hung Hom North Approach Tunnels contract (Contract SCL 1111) (“**SCL 1111**”). I left Leighton in December 2018.

Interface meeting for the Project and SCL 1111

5. I confirm that I attended the 18th interface meeting between the Project and SCL 1111 on 18 January 2016 (“**18 January 2016 Meeting**”) [CC2/847-854]. I recall that I began attending these periodic interface meetings (“**Interface Meeting**”) at Jim Wong’s request. I started attending after Johnny Leung, (Site Agent working on NAT under Jim Wong) left the NAT in or around early 2015.
6. The record-keeping practice for Interface Meeting was that Gammon Kaden JV (“**GKJV**”) and Leighton would take turns in preparing minutes and circulating it to the other parties in attendance. When I attended an Interface Meeting and Leighton was responsible for preparing the minutes, I would assist Jim Wong in preparing the meeting minutes. I would send the draft meeting minutes for his approval.
7. I would then circulate the draft minutes to Chris Chan, the MTRCL’s construction engineer who attended the Interface Meeting, for his approval before distributing it to other parties via an email chain. The email chain would usually consist of all attendees and they would have the opportunity to comment on the meeting minutes before it was finalised. I would also receive meeting minutes prepared by GKJV from this email chain.
8. I understand that those meeting minutes might also have been circulated by letter or electronically by Contractor Submission Form (CSF) on MTRCL’s online system, although I do not recall receiving meeting minutes through those channels.
9. In preparation of those meeting minutes, our practice was to use the meeting minutes from the previous meeting as a starting point and amend it in track changes to record the updates on the items as discussed in those Interface Meetings. Therefore not every item set out on the meeting minutes would have been discussed specifically during an Interface Meeting. In other words, the meeting minutes serve as a document setting out every item discussed in those Interface Meetings as at the date of the meeting minutes (to the extent that the item was still a live issue).

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

10. If an issue raised during the Interface Meeting falls within my responsibility, for instance in relation to drainage at the interface, I would usually address the issue together with the engineers under my supervision.
11. I have reviewed the meeting minutes for the 18 January 2016 Meeting. It was recorded in the minutes and I recall that the use of BOSA brand couplers for T40 reinforcement bars (“**rebar**”) and LENTON brand couplers for other rebar was mentioned by the GKJV’s representative(s) during the Interface Meeting (“**GKJV’s Proposal**”). At the time, it did not register with me that LENTON brand couplers - which I understood at the time were for rebar other than T40 rebar - should be used at the interface. This is because (while I did not work on the NAT tunnel construction works and was not aware of the stitch joint connection at the time) I recall that large-diameter rebar (such as T40 rebar) were used in the NAT tunnel construction, therefore the GKJV’s Proposal did not necessarily mean that LENTON brand couplers should be used at the interface.
12. For the item “*Mechanical Splicing System of rebar*” on the meeting minutes, I note that it was first revised from “(ref. 1111-MSF-GKJ-CS-000808A), Re-submission” [CC2/774] (in the meeting minutes for the 9th Interface Meeting) to “(ref. 1111-MSF-GKJ-CS-000832) - Approved” in the meeting minutes for the 10th Interface Meeting [CC2/769] [**my emphasis added**]. This revision has been retained through to the meeting minutes for the 18 January 2016 Meeting, when the item was further amended to include GKJV’s Proposal. However, I only recall being informed of GKJV’s Proposal during that meeting; I do not recall there was another approval process for that item in the meeting.
13. I also reviewed the meeting minutes for the 16th Interface Meeting [CC2/818-830] and the minutes disclosed by MTRCL [BB3/1739-1740] seem to be incomplete. I remember the meeting minutes as disclosed by Leighton is the version that I received at the time. In particular, I do not recall having received the two Contractor’s Materials Related Submission Forms (numbered: 1111-MSF-GKJ-CS-000808A and 1111-MSF-GKJ-CS-000832) [BB3/1741-1757] or discussing them during that Interface Meeting.
14. In any event, I was not informed of the GKJV’s Proposal until the 18 January 2016 Meeting.

15. I was not responsible for NAT tunnel construction work and specifically the initial stitch joint construction work between the Project and SCL 1111. I therefore expected that Jim Wong would communicate directly with the team members responsible for those works and address the issues raised during the Interface Meeting if they relate to tunnel construction work.
16. I do not know if Jim Wong informed others of the GKJV's Proposal after the Interface Meeting. I therefore do not know if anyone else at Leighton was aware of the GKJV's Proposal.

Dated the 25th day of May 2019.

Signed:

Regina Wong