



**ISSUES PAPER**

# **Reducing Unnecessary Regulatory**

**Burdens on Business:**

**PROFESSIONAL SERVICES TO THE  
CONSTRUCTION INDUSTRY**

**MAY 2015**

## **The Professional Services to the Construction Industry Issues Paper**

MPC is releasing this issues paper to assist individuals and organizations to prepare and participate in the review. It contains and outlines:

- The scope of the review
- Matters about which the MPC is seeking comment and information
- Information about how you can get involved in the review.

Participants may add any comment which they consider relevant to the review.

**Due date for submissions: 31 July 2015**

**Submissions can be made by email or fax to:**

Email : [alamin@mpc.gov.my](mailto:alamin@mpc.gov.my) and [asrin@mpc.gov.my](mailto:asrin@mpc.gov.my)

Fax: 03-7960 0206

### **Contacts:**

Mr. Mohammed Alamin Rehan

Tel: 03-7960 0173

Email: [alamin@mpc.gov.my](mailto:alamin@mpc.gov.my)

Ms Khalidatul Asrin Abdul Aziz

Tel: 03-7960 0173

Email: [asrin@mpc.gov.my](mailto:asrin@mpc.gov.my)

## Table of Contents

<b>1.0</b>	<b>TERMS OF REFERENCE .....</b>	<b>5</b>
1.1	What MPC has been asked to do? .....	5
1.2	Conduct of the review.....	5
1.3	Timing.....	5
1.4	Contacts .....	6
<b>2.0</b>	<b>SCOPE OF THE REVIEW.....</b>	<b>7</b>
2.1	What is this study about? .....	7
2.2	The Professionals Servicing the Construction Industry .....	7
2.3	What is Regulation? .....	9
2.4	Market Failures.....	11
2.4.1	Problems with asymmetric information .....	11
<b>3.0</b>	<b>RECENT DEVELOPMENTS AFFECTING THE PROFESSIONAL SERVICES .....</b>	<b>12</b>
3.1	Expectation and Demand in Professional Services .....	12
3.2	Expectation in Professional Services Serving Building Industry .....	13
3.3	Investment in Technology .....	13
3.4	Shortage of Professions Serving the Construction Industry .....	13
<b>4.0</b>	<b>REGULATION PROCEDURES IN PROFESSIONAL SERVICES VALUE CHAIN ...</b>	<b>14</b>
<b>5.0</b>	<b>YOUR OPINION ON UNNECESSARY REGULATORY BURDENS .....</b>	<b>17</b>
5.1	Some general questions .....	17
5.2	Particular Concerns Identified So Far .....	17
5.2.1	Controls on Professional Administration.....	17
5.2.2	Professional Services Regulators.....	18
5.2.3	Intervention by Government and Agencies .....	19

5.2.4	Entry Requirement of Professional Registration .....	20
5.2.5	Setting up of Practice.....	21
5.2.6	Registration of Business .....	22
5.2.7	Service Registration with Government .....	24
5.2.8	Non- professional Statutory Registration.....	24
5.2.9	Collecting taxes for the Government .....	25
5.2.10	Dealing with Construction Permits.....	25
5.2.11	Issuance of the Certificate of Completion and Compliance.....	26
5.2.12	Green Technologies .....	27
5.2.13	Completion / Termination of Practice .....	28
5.2.14	Liberalisation of Professional Services .....	29



23 April 2015

**REGULATORY REVIEW ISSUES PAPER:  
PROFESSIONAL SERVICES TO THE CONSTRUCTION INDUSTRY**

---

**1.0 TERMS OF REFERENCE**

**1.1 What MPC has been asked to do?**

The 10th Malaysia Plan has mandated the Malaysia Productivity Corporation (MPC) to carry out regulatory review to make it easier to do business in Malaysia. In relation to this, the Malaysia Service Development Council (MSDC) asked MPC to review the regulations affecting the professional services servicing the construction industry. This review will draw on the expertise and perspectives of public and private sector leaders, who will help identify key issues and possible solutions. While it is not one of the 12 National Key Economic Areas (NKEAs), building contributes to all of them.

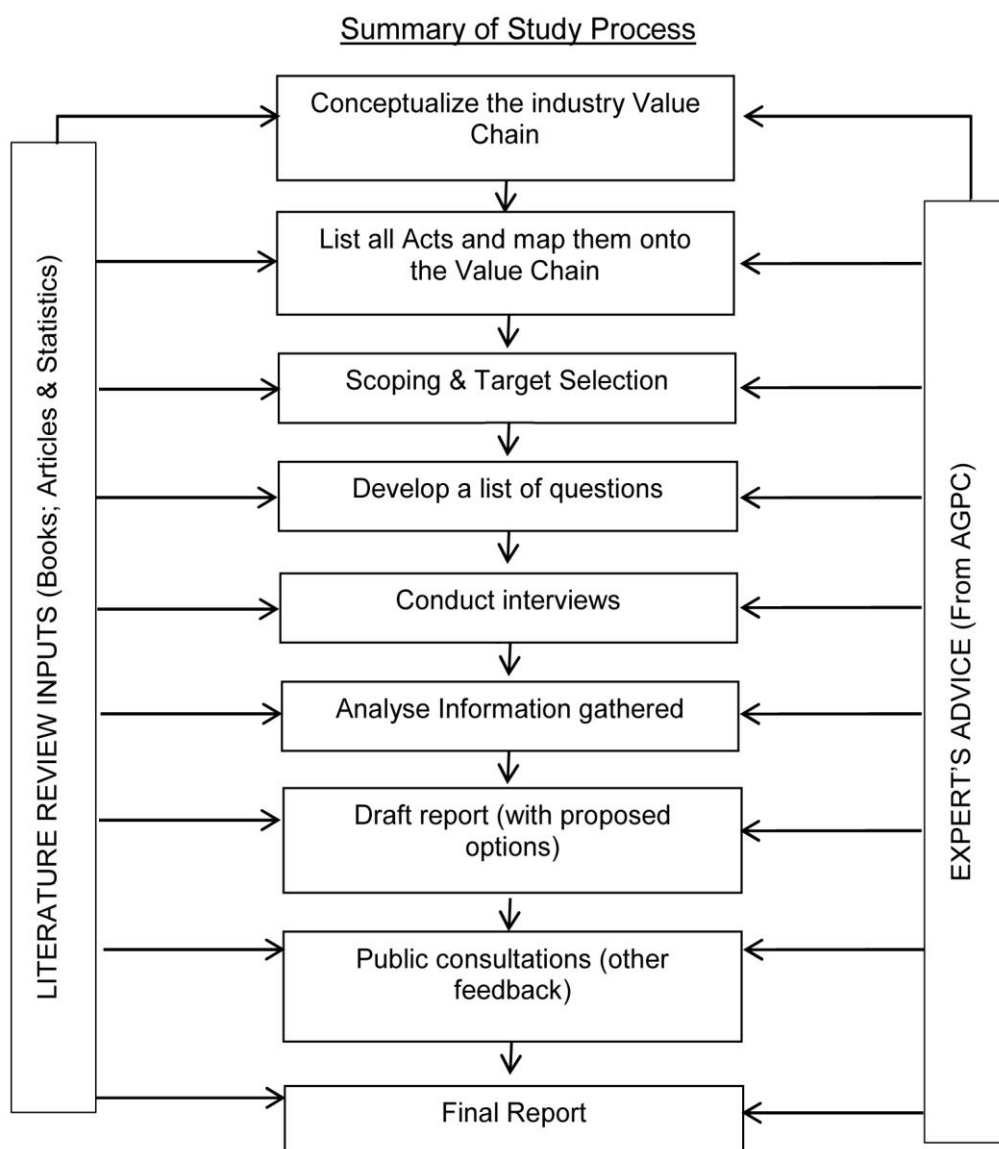
**1.2 Conduct of the review**

The study will emulate the approach used by the Australian Government Productivity Commission (AGPC) and the team will be guided by a regulatory expert Ms. Sue Holmes. The team will interview a sample of practices providing engineering, architecture, planning and surveying services to the building industry across the country, in order to identify the regulatory issues of concern to them. Based on the principles of good regulatory practices, the team will formulate feasible options for further deliberation. These issues and options will be subject to further consultation with relevant stakeholders in order to develop concrete recommendations that will reduce unnecessary regulatory burdens. The figure below summarises the study process for this review.

**1.3 Timing**

This review commenced in 2014 with several meetings with the Boards of Engineers Malaysia, Board of Architects Malaysia, Board of Land Surveyors Malaysia, Board of Quantity Surveyors Malaysia and Associations of Consulting Engineers Malaysia. This Issues Paper is released as a guidance for all interested parties to participate in this review. The final report is expected to be completed by end of 2015.

**Diagram 1: Summary of Study Process**



## 1.4 Contacts

Interested parties are welcomed to participate in this review. You can contact the persons below on matters relating to this review.

Ms. Khalidatul Asrin Abdul Aziz  
 (Administrative matters)  
 Tel: 03-7960 0173  
 Fax: 03-7960 0211  
 Email: asrin@mpc.gov.my

Mr. Mohammed Alamin Rehan  
 (Other matters)  
 Tel: 03-7960 0173  
 Fax: 03-7960 0211  
 Email: alamin@mpc.gov.my

## 2.0 SCOPE OF THE REVIEW

The regulations and agencies which govern the professionals servicing the building industry will be assessed and analysed with the focus on modernising business regulations. Any redundant, unnecessarily burdensome and outdated regulations will be identified and options will be proposed to reduce the unnecessary burdens in order to achieve a dynamic, modernised business ecosystem.

Over-regulating can occur either when it is not needed to address social, economic or environmental concerns, or when legitimate issues are addressed in overly costly ways. Governments need to carefully balance the costs and the benefits to the public to ensure the cost burdens do not outweigh the benefits to the public.

### 2.1 What is this study about?

This issues paper is intended to assist interested parties either to contribute to a meeting with MPC or to prepare a submission to the MPC on Professional Services to Construction Industry in Malaysia. It provides some general background information and raises questions that can assist in preparing a submission. The issues addressed in this paper and the guiding questions cover only a portion of the possible issues. Hence, participants are encouraged to comment on any issues they believe are relevant to the review not just those raised here.

For the purpose of this review, the scope covers the professional services that are directly related to building industry, which are **Architects, Engineers, Quantity Surveyors, Town Planners and Land Surveyors** (which will be referred to as “the Professionals” in this paper). These professionals provide services to the building industry and also other sectors such as education, transportation, infrastructure, tourism etc.

### 2.2 The Professionals Servicing the Construction Industry

In this review, regulations impacting on the following construction professionals will be examined:

Architect - An architect is a registered professional who provides architectural consultation services that include preparation of layout plan and building designs, submission of layout plans for planning approval, and supervision of construction works to ensure they accord with the approved building plan. Architects also perform as the lead consultant in a building project, and act as the Principal Submitting Person in obtaining building plan approval and issuing Certificate of Completion and Compliance (CCC) upon completion of a building construction. Additional services

provided by architects may include landscape plan design and submission, cost management, and interior design.

Engineer - An engineer is a registered professional who provides engineering services in various fields of works include building constructions, infra-structures, manufacturing, mining, automotive and etc. In building industry the field of engineering services are divided into civil engineering, structure engineering, mechanical engineering and electrical engineering. A consulting engineer is entitled to provide engineering services and advice in connection with project feasibility studies, planning, survey, design, construction, commissioning, operation, maintenance and management of engineering works or projects<sup>1</sup>. In certain categories of buildings, engineers also perform as the lead consultant and act as the Principal Submitting Person in obtaining building plan approval and issuing CCC. In construction, engineers supervise construction works to ensure they accord with the approved building plan, and the engineering plan designed and endorsed by the relevant engineer.

Quantity Surveyor - A quantity surveyor is a registered professional, qualified and trained to advise on all aspects of construction costs, financial and contractual administration. Quantity surveyors provide expertise on the cost and management of construction projects, whether building, civil or heavy engineering<sup>2</sup>.

Town Planner - A town planner is a registered professional who works in the field of land use planning for the purpose of optimising the effectiveness of a community's land use and infrastructure. A town planner formulates plans for the development and management of urban and suburban areas, typically analysing land use compatibility as well as economic, environmental and social needs.

Land Surveyor - A land surveyor is a licensed professional with the academic qualifications and technical expertise to practise the science of measurement; to assemble and assess land and geographic related information; to use that information for the purpose of planning and implementing the efficient administration of the land, the sea and structures thereon; and to instigate the advancement and development of such practices<sup>3</sup>.

Under the laws of Malaysia, the practices of these professions are governed by their respective Acts listed in the following table.

---

<sup>1</sup> Registration of Engineers Act 1967 (Act 138).

<sup>2</sup> Royal Institute of Surveyors Malaysia, QS Division – ([http://www.rism.org.my/ContentPages/QS\\_Division\\_Background.aspx](http://www.rism.org.my/ContentPages/QS_Division_Background.aspx)).

<sup>3</sup> Royal Institute of Surveyors Malaysia, GLS Division – ([http://rism.org.my/ContentPages/GLS\\_Division\\_Background.aspx](http://rism.org.my/ContentPages/GLS_Division_Background.aspx)).

**Figure 2.1: The profession regulators, relevant acts, institutions and associations.**

<b>Profession</b>	<b>Regulator</b>	<b>Relevant Acts</b>	<b>Institution / Association</b>
Architect	Board of Architects Malaysia	<i>Architects Act 1967</i>	Malaysian Institute of Architects (PAM)
Engineer	Board of Engineers Malaysia	<i>Registration of Engineers Act 1967</i>	Institute of Engineers Malaysia (IEM), Association of Consulting Engineers Malaysia (ACEM)
Quantity Surveyor	Board of Quantity Surveyors Malaysia	<i>Quantity Surveyors Act 1967</i>	Royal Institution of Surveyors, Malaysia (RISM)
Town Planner	Board of Town Planners Malaysia	<i>Town Planners Act 1995</i>	Malaysian Institute of Town Planners (MIP), Malaysian Town Planners Association (PERSADA)
Land Surveyor	Board of Land Surveyors Malaysia	<i>Licensed Land Surveyors Act 1958</i>	Royal Institution of Surveyors, Malaysia (RISM), Association of Authorised Land Surveyors Malaysia (PEJUTA)

The main objective of the professional Acts is to govern the practice of professionals in the interest of the public and the nation. However, there are instances where over-regulation of these professions leads to unnecessary burdens to business and the public. This review should provide options to make business easier and to boost productivity.

### 2.3 What is Regulation?

Regulations are Acts, laws, by-laws, rules or directives prescribed and maintained by an authority, especially to regulate behaviour. They can also include quasi regulation such as guidelines and administrative circulars. A good regulatory system should have a set of regulations which are clear to practitioners, administratively efficient, enforceable and legitimate.

Regulatory burdens are the extra requirements, activities and costs that practitioners must deliver or bear in order to comply with regulations. The extra requirements usually

demand extra efforts, time and cost from the practitioners, thus impose costs on and often decrease the productivity of the practitioners. These costs or adverse impacts include:

- administrative and operational requirements such as reporting, record keeping, getting legal advice and training,
- requirements on the way goods and/or services are managed and handled, such as prescriptions on transportation and handling methods, occupational registration requirements requiring professionals to use particular techniques,
- requirements on the characteristics of what is transported or handled, such as dangerous and restricted goods, and
- loss of opportunities due to prohibitions, such as ban on import/export of certain goods.

Unnecessary regulatory burdens arise when regulation is more burdensome than necessary in serving its objectives. Where regulation is poorly designed or written, or it is not administered or enforced well, it may impose greater burdens than necessary. In reviewing existing regulation, it is those regulatory burdens which can be considered 'unnecessary' that are of primary interest. The common types of unnecessary regulatory burdens experienced by business include:

- excessive coverage by a regulation – that is, the regulation affects more activity than was intended or required to achieve its objective,
- subject-specific regulation that covers much the same issues as other generic regulation,
- prescriptive regulation that unduly limits flexibility such as preventing businesses from:
  - using the latest technology
  - making changes to better meet customer demand
  - meeting the underlying objectives of regulation in different ways,
- overly complex regulation,
- unwieldy licence application and approval processes, excessive time delays in obtaining responses or duplicative information requests,
- an overlap or conflict in the activities of different regulators, and
- inconsistent application or interpretation of regulation by regulators.

You can read more on this from: *A Guide to Reducing Unnecessary Regulatory Burdens: A Core Concept*. This booklet can be downloaded from [www.mpc.gov.my](http://www.mpc.gov.my)

Restrictions on competition can also be unnecessary. For professional services, the main sorts of barriers concern those which limit the number of people able to offer any of these services, usually by applying entrance criteria to become members of the relevant association or occupational group. The question is whether or not they are necessary to protect clients or the public?

## **2.4 Market Failures**

Sometimes freely operating markets fail to provide the optimum level and quality of output. Generally, regulation is required to protect the public interest and increase market efficiency when there are flaws in the market. This usually happens when the market structure, the product, the production process or the exchange has certain characteristics. In professional services, the most significant market failure is due to the difficulty clients have in assessing capacities of the Professionals and the quality of the work they do. This is generally referred to as the 'principal-agency' problem arising from the information asymmetry between the two parties. Without intervention, Professionals have the advantage due to their greater knowledge.

### **2.4.1 Problems with asymmetric information**

Purchasers of buildings and hirers of construction professionals are not able to fully assess the quality of a building or the capacities of construction professionals, respectively.

There is also the principal-agent problem which occurs when the 'agent' is able to make decisions that impact on another person or entity - the 'principal'. The dilemma exists because sometimes the agent is motivated to act in his own best interests rather than those of the principal. For example, a developer (the principal) may wonder whether his architect (the agent) is recommending expensive building material because it is truly necessary for the project commissioned by the developer, or because it will generate more income for the architect.

The problem arises where the two parties have different interests and asymmetric information (the agent having more information), such that the principal cannot directly ensure that the agent is always acting in its (the principal's) best interests. Conflict of interest may arise.

In general, society has addressed this information asymmetry by providing some guarantees as to the capacities of the Professionals. This is a prime role played by the Professional Boards mandated via the Professional Acts listed above. However, these guarantees about the capacities of the Professionals may prevent some competent producers to bid to get contracts - which may result in higher fees than otherwise would be the case.

Self-regulation by professional boards allows discretion to restrict entry and imposes additional requirements in terms of training programmes and other qualifications in selection of prospective candidates. The rules and regulations are frequently set up by the professional bodies, reflecting the better capacity of the bodies to know what is required to establish competency.

While professional bodies have the greatest capacity to judge competency, they can face two types of adverse incentives: one is to be too lenient on its members when assessing poor performance; and the other is to apply entry requirements which are too stringent in

order to reduce competition and to increase capacity of current members to charge higher fees due the resulting lower numbers of professionals.

While it is necessary to impose requirements for entrants, if the requirements are overly stringent for a graduate to register as a member of the Professional Association this will result in fewer people being able to perform the services and lead to unnecessarily high compliance costs for building development projects, resulting in higher prices for their customers. Similar unnecessary costs arise where other competent occupational groups are prevented from delivering similar services.

Therefore, the regulators and professional associations have to be cautious in prescribing selecting criteria for entry to these professions and in regulating the delivery of professional services, thus to get the balance right between protecting clients and others from their incapacity to assess the competency of Professionals while not making the barriers to entry overly stringent. It may be important that Government play some role in ensuring the public interest is given sufficient weight and to achieve the right balance between competing interests.

### **3.0 RECENT DEVELOPMENTS AFFECTING THE PROFESSIONAL SERVICES**

#### **3.1 Expectation and Demand in Professional Services**

In the 2012 World Development Indicators, the services sector accounted for almost 72% of global GDP in 2010 and is expanding at a faster rate than the agriculture and manufacturing sectors (World Bank, 2012). In Malaysia, the services sector contributed 55.2% to GDP in 2013 (Malaysia, 2014), although services in most developed nations on average contribute 70-80% to GDP. In the 10th Malaysia Plan, the services sector is targeted to contribute 65% of the GDP by 2020 (Malaysia, 2010). This will require services to grow by 7.2% p.a. with an average annual investment of RM45.8 billion.

Although it is forecasted that the service sector will be the major contributor to the world economy, in Malaysia demand for professional services serving the construction industry fluctuates depending on the economic climate and it varies from one profession to another.

Besides their direct contribution to the GDP, the construction Professionals play major roles in national development through their contribution to other various sectors. Hence, any improvements in these professional services will add value to the respective sectors and this linkage will ultimately generate multiplier effect for the economy. As an example, a service rendered by a Professional in a hotel project may not be seen as a major contribution to the economic development, but the multiplier effect from the hotel project is providing the platform for other economic activities and future economic opportunities through hospitalisation services, tourism, transportation, retail, manufacturing and etc.

### **3.2 Expectation in Professional Services Serving Building Industry**

Professional services serving the building industry provide designs and link fragmented building industrial production processes between manufacturing and services. Continuous improvement of this knowledge intensive workforce is consistent with Malaysia's aspiration to become a high income nation by 2020. There are pressures on the professionals to be able to compete in a bigger market.

Larger corporations and government agencies insist on the use of Building Information Modelling (BIM) in their development projects. Although some architects and engineers have started using BIM in their offices, currently, the use of BIM is not regulated and there is no national standard. Agencies and professionals use their own ways of implementing BIM or adopt some foreign BIM protocols. Unless a BIM standard for Malaysia is agreed, there is likely to be confusion and inconsistency, especially once local authorities impose compulsory use of BIM in building plan submissions.

The Geographic Information System (GIS) is another new technology in Land Surveying and Land Planning. Both BIM and GIS are the future potential information technologies with high potential for integration. How well these technologies are integrated will have a significant influence on how construction professionals do their work in the future.

### **3.3 Investment in Technology**

Among the major investments made by the Professionals are investments in technology which include computer hardware and software. In the future, professional services to building industry will very much depend on technology - it will not be an option anymore. Currently, some professionals are grappling with this issue as they are unsure of which software to purchase due to inter-platform compatibility and in some cases the sale of the software are monopolised by certain dealer or supplier. Present BIM software in the market has compatibility restrictions, whereby different versions of software cannot operate the files created using different versions of BIM software.

### **3.4 Shortage of Professions Serving the Construction Industry**

In Malaysia, PAM has reported that the ratio of architects to population is 1:15,000. This is far below the ratio of architects to population in most developed countries. Members of PAM have raised their concern about shortage of architects to serve the need of the growing population. The research commissioned by Union of International Architects (UIA) shows that ratio of architects to population is between 1:500 to 1:2500 in European countries and close to 1:3000 in the US (COAC, 2005). Some engineering professionals consider they face similar shortages in man power. Contrarily, during the interview with Board of Quantity Surveyors Malaysia and Board of Land Surveyors Malaysia, it was noted that the resources in quantity surveying and land surveying professions are not worrying the professions as the

source of talents in both field of works are at the professions' comfort level (UNESCO, 2010).

Based on UNESCO's Engineering Report 2010, the demand for engineering talent is increasing<sup>4</sup> and experts predict the global market for climate change solutions such as low carbon products and renewable energy systems will rapidly reach US\$1 trillion dollars and continue to grow (UNESCO, 2010). At the same time, the shortage of engineers is marked in many countries. Germany reports a serious shortage of engineers in most sectors, and in Denmark, a study showed that by 2020 the labour market will be lacking 14,000 engineers. And although in absolute numbers the population of engineering students is multiplying world-wide, percentages are dropping compared to enrolment in other disciplines. In Japan, the Netherlands, Norway and the Republic of Korea, for example, enrolment decreases of 5 to 10% have been recorded since the late 1990s (UNESCO, 2010).

#### **4.0 REGULATION PROCEDURES IN PROFESSIONAL SERVICES VALUE CHAIN**

The value chain of the process in professional services regulations at different stages of registration and approval required to be adhered by the Professional as illustrated in

**Figure 4.1.** The figure shows a general summary of the stages involving various regulators and government agencies in registering and regulating Professionals in delivering their services.

In the whole process of delivering the professional services, the Professional may encounter numerous regulations other than the registration of the professional practice. These may include the regulations in charging professional fees, rules in delivering services, contract administration, professional risk and indemnity, etc.

The main regulatory issues faced by building Professionals relate to dealing with construction permit processes. These processes consist of a wide range of procedures from application for planning permission to certification of building completion by the Principal Submitting Person (PSP). In many cases the process may also include the application for approval related to land matters such as land conversion, sub-division, amalgamation, surrender and alienation of land. A special task force - Focus Group in Dealing with Construction Permit (FGDCP) - was set up to look into improving the procedures in dealing with construction permits in Peninsular Malaysia.

---

<sup>4</sup> UNESCO. (2010). Engineering: Issues, Challenges and Opportunities for Development. Paris: United Nations Educational, Scientific and Cultural Organization (UNESCO).

Figure 4.1 Professional services regulation value chain diagram from the setting up to the closure of professional practice.

PROCESS	PARTIES	PROCEDURES
Setting up of Practice	Professional Boards	<ul style="list-style-type: none"> <li>Comply with academic qualification, practical experience and examination requirement.</li> <li>Obtain practice registration approval from the board</li> </ul>
Registration of Business	Companies Commission of Malaysia (SSM)	<ul style="list-style-type: none"> <li>Registration of business or company with SSM before commencement of body corporate or partnership practice.</li> </ul>
Service Registration with Gov.	Government Agencies	<ul style="list-style-type: none"> <li>Registration with MOF for delivery of service to government and its agencies.</li> <li>Registration of service with various agencies.</li> </ul>
Non – Profession Statutory Registration	Custom Dept., Inland Revenue Board (IRB)	<ul style="list-style-type: none"> <li>Registration with Custom Dept. service tax collection</li> <li>Registration with (IRB) for personal tax deduction</li> </ul>
Delivery of Professional Service	Professional Boards, Gov. Agencies, Local Government	<ul style="list-style-type: none"> <li>Registration with various agencies other than professional board in delivering professional service i.e. SPAN, JPBD, ILAM, Local Authority etc.</li> </ul>
Dealing with Construction Permit	Tech. Agencies, Local Government	<ul style="list-style-type: none"> <li>Various issues on Dealing with Construction Permit is dealt under Focus Group on Dealing with Construction Permit (FGDCP)</li> </ul>
Completion/ Termination of Practice	Professional Boards, SSM	<ul style="list-style-type: none"> <li>Deregistration of Practice by Professional Board</li> <li>Closing / winding up of company under the Company Act.</li> </ul>

**Figure 4.2 Various acts and regulations imposed to the professional at different stages of registration and approval for delivering professional services.**

Profession	Architect	Engineer	Quantity Surveyor	Town Planner	Land Surveyor
<b>Processes:</b>	Relevant regulations				
<b>Setting up of practice</b>	Architects Act 1967	Registration of Engineers Act 1967	Quantity Surveyors Act 1967	Town Planners Act 1995	Licensed Land Surveyors Act 1958
<b>Registration of business</b>	Registration of Business Act 1956, Companies Act 1965, Partnership Act 1961, Limited Liability Partnerships Act 2012, Companies Regulations 1966, Registration of Business Rules 1957, Limited Liability Partnerships Regulations 2012				
<b>Service registration with gov.</b>	Financial Procedure Act 1957, Government Contracts Act 1949, Ministry of Finance - Treasury Instructions - (AP) 166 to 206 and 229 to 300, Treasury Circular Letter 2/2011- S/K.KEW/PK/P/1100/000000/165/23 Jld. 9 SK 1 (4),				
<b>Non-profession statutory registration</b>	Tax collection: Service Tax Act 1975, Service Tax Regulations 1975, Service Tax Order 2000 Goods and Services Tax Act 2014, Income Tax Act 1967, General: Local Government Act 1976, Business Premise and Signage Licensing, Employment Act 1955, Immigration Act 1959/63, Foreign workers permit, East Malaysia work permit				
<b>Delivery of professional services</b>	Architects Act 1967 & other regulations under the Act	Registration of Engineers Act 1967 & other regulations under the Act	Quantity Surveyors Act 1967 & other regulations under the Act	Town Planners Act 1995 & other regulations under the Act	Licensed Land Surveyors Act 1958 & other regulations under the Act
<b>Dealing with const. permit</b>	National Land Code 1965, Street, Drainage and Building Act 1973, Town and Country Planning Act 1976, Uniform Building By-laws 1984, Occupational Safety and Health Act 1994, Local Government Act 1976, Various utilities services acts and other regulations under these acts.				
<b>Completion or termination of practice</b>	Architects Act 1967	Registration of Engineers Act 1967	Quantity Surveyors Act 1967	Town Planners Act 1995	Licensed Land Surveyors Act 1958
	Registration of Business Act 1956, Companies Act 1965, Partnership Act 1961, Limited Liability Partnerships Act 2012,				

## **5.0 YOUR OPINION ON UNNECESSARY REGULATORY BURDENS**

MPC has developed a standard set of questions for its reviews and these are listed directly below. After that, the issues that have already been raised in preliminary meetings or identified in preliminary research are briefly described and followed with a few questions. MPC would like to hear your opinion on these issues and other regulatory costs which require modernisation, irrespective of what is listed here.

### **5.1 Some general questions**

1. Which regulations, including, but not only, those written and/or administered by Professional associations, concern you the most? Why?
2. Which regulations are the hardest to comply with?
3. Which regulations do you think are too burdensome given what they are trying to achieve?
4. Do you think any regulations are not justified at all?
5. Are some regulatory requirements inconsistent? Are all requirements publically accessible?
6. Do you consider the Professional associations and other regulatory administrators do a good or a poor job? In what ways?
7. Do you find the Professional associations and administrators are consistent in their decisions?
8. Do you find they are helpful or unhelpful in advising you how to comply? Are there any publicly available guidelines?
9. How long do the Professional associations and other regulators take to respond to applications to register, etc.?
10. Do you have any suggestions for reducing the burden of compliance of regulations whether administered by the Professional associations or Government administrators?
11. Some practice guidelines, technical instructions, circular letters and other forms of administrative controls implemented by the regulators are not gazetted, do you have trouble in knowing when they have been issued and in accessing them?
12. Is there any administrative controls implemented by the regulators and Professional associations which you believe are unnecessary?

### **5.2 Particular Concerns Identified So Far**

#### **5.2.1 Controls on Professional Administration**

The regulation and administration of professional practice by the professional boards are made with the authority provided under an Act of Parliament. Through the professional

Acts, the relevant boards regulate the practice of its professional members and makes rules and regulations to be adhered by its members. Amendments to the Acts must be formalised by a gazette in Parliament. Rules and regulations made by the Boards can be gazetted under the minister and do not required to be tabled in parliament, though they must be formalised through Minister's approval.

Although the Federal Government holds the highest authority in the legislative structure, state and local governments are also empowered to issue gazetted state and municipality regulations, rules and by-laws as long as they do not contradict the Act of Parliament.

Besides the Acts of Parliament, gazetted regulations and rules, it is also common for regulators to issue other forms of controls such as technical and non-technical statements of policies, practice guidelines, circular letters, letters of instructions, desk instruction, and technical instructions. These controls shall not constitute a law under the legislation but form the administrative procedure required to be fulfilled by practitioners. The administrative controls may be introduced by the regulators from time to time to facilitate the administration of the practice of its members. Nevertheless, the administrative controls should not be implemented in any way contrary to the Acts or gazetted rules, regulations or by-laws.

13. Some practice guidelines, technical instructions, circulars and other forms of administrative controls implemented by the regulators are not gazetted, do you have trouble in knowing when they have been issued and in accessing them?

### **5.2.2 Professional Services Regulators**

Through the provisions of the respective Acts, the professional boards are empowered to make rules and regulations to self-regulate the practice of the Professional. The members of professional boards consist of professional members of the profession, in effect, the profession is governed by its own appointed professional members. These professional boards are also the custodians of the respective professional Acts. The professional boards also have the authority to prescribe academic qualifications and practical experience requirements for the graduates to register as the professional members. After obtaining approval of professional registration from the Boards, Professionals may establish their practice in accordance with the rules and regulations set by the Boards.

With the approval of registration of the professional practice, the Professionals are allowed to deliver professional services to the building industry. In addition to the requirement for registration under the professional Acts, there are a lot more registration requirements, rules and regulations imposed by various parties and agencies that also need to be fulfilled by Professionals. Some of these regulations and registration are used to fulfil the specific objectives of the various agencies. This has resulted in multiple registration requirements with several agencies.

14. Do you think that the regulations imposed by the professional boards are efficient in protecting the public interest? Do you think it would be possible to streamline some requirements? Do Professionals have to provide the same information to different agencies?

### **5.2.3 Intervention by Government and Agencies**

In addition to the enforcement of the professional Acts by the professional boards, some Government agencies have written extra regulations affecting the practice of the Professionals. As an example, although a Civil Engineer registered with the Board of Engineers Malaysia is qualified to deliver civil engineering services in Malaysia, in some cases there are other regulations that require the Civil Engineer to be registered with a local authority and National Water Services Commission (SPAN) before he can deliver the water related services.

Frequently, when the Government introduces additional measures to stiffen the regulation, they are meant to protect the interest of the public and to improve the administration of the professionals. Although the professional boards have power to enforce and take action against its member, but they have been very conservative in taking actions against others who are not their members. BAM, BEM and BQSM are of the opinion that they are not empowered to enforce the Act to the non-registered 'professional'. However, it is observed that the provision under Section 7 of the respective professional Acts prohibit others from 'assuming' and 'acting' as the professionals, but the Boards has yet to take any action against them. To date, it has never been tested in court and the question whether the professional board has the authority to enforce the regulations on others or not has never been ascertained.

Therefore, SPAN came out with rules that required another level of registration which includes plumbers, specialist contractors and other parties who are not registered under BEM.

15. Through this review, the respondents are encouraged to give feedback and suggestion to MPC on their experience and concerns in dealing with these regulations.
16. Can you suggest ways to address this overlap in functions and regulations which would be less burdensome?
17. Do you think that the professional boards have enough capacity to enforce the regulations on their members and as well the others?

## 5.2.4 Entry Requirement of Professional Registration

Prior to acceptance of registration as professional member with the professional boards, a graduate must undergo specialised training consisting of recognised education programme, practical experience and professional examination or interview to qualify for the registration. Professional boards may prescribe their own entry rules and requirements to be fulfilled by the prospective professional.

Figure 5.2 Entry requirement for different professional board registration.

Field of Study	Architecture <sup>*1</sup>	Engineering <sup>*2</sup>	Quantity Survey <sup>*3</sup>	Town Planning <sup>*4</sup>	Land Survey <sup>*5</sup>
	Entry requirement for professional registration				
<b>Higher Education</b>	B. Architecture or equivalent (min 5 years)	B. Engineering or equivalent (min 4 years)	B. Quantity Surveying or equivalent (min 4 years)	B. Town Planning or equivalent (min 4 years)	B. Surveying or equivalent (min 4 years)
<b>Under Grad. Practical Experience</b>	Compulsory (min 6 months)	Compulsory (min 8 weeks)	Compulsory (min 6 months)	Required	Compulsory (min 6 months)
<b>Post Grad. Practical Experience</b>	Compulsory (min 24 months)	Compulsory (min 36 months)	Compulsory (min 24 months)	Compulsory (min 24 months)	Compulsory (min 24 months Articled Pupil after Part I)
<b>Practical Experience Report/ Certificate</b>	Experience Log Book and Report Submission	Certificate of Training	Experience Log Book and Report Submission	Proof of prescribed practical experience	Schedule 8 – Statement of Training Form (Part II)
<b>Oral Examination /Interview</b>	Part III Oral Examination	YES – various disciplines	Compulsory interview after passing written exam.	Compulsory interview after passing MIP written exam.	Compulsory Viva during Part III
<b>Written Examination</b>	Part III Professional Examination	Professional Assessment Exam. (PAE)	Joint Test of Professional Competency	MIP Course and MIP Exam.	Part I, II & III LJT Examination

Source: <sup>\*1</sup> – Board of Architects Malaysia

<sup>\*2</sup> – Board of Engineers Malaysia

<sup>\*3</sup> – Board of Quantity Surveyors Malaysia

<sup>\*4</sup> – Malaysian Institute of Planners

<sup>\*5</sup> – Board of Land Surveyors Malaysia

Professional boards set the criteria for assessment and accreditation of programmes offered by institutions of higher learning. Graduates who have accomplished their study from the accredited programme are allowed to apply for registration as professional members after fulfilling the practical experience and examination requirement prescribed by the professional boards. Other graduates who have completed their study from unrecognised programmes will not be able to register as the graduate members of the professional boards, unless they undertake either additional training, courses, examination or interview as determined by the professional boards. For example, the Board of Quantity Surveyors Malaysia requires graduates from unrecognised programme to attend ‘topping up’ courses before they can be admitted as graduate members of the profession.

Upon registration as Graduate Members, or ‘Articled Pupil’ in the case of land surveyor, the graduates in Architecture, Engineering, Town Planning or Land Surveying are required to gain practical experience and sit for the written or oral examination. Most of the examinations and interviews are conducted by the professional boards. However, for town planning graduates, the examination and interview are conducted by Malaysian Institute of Planners (MIP). After passing the written examination, MIP shall conduct interviews to select the qualified Graduate Town Planner candidates for professional registration. In the case of architects, the Board of Architects Malaysia (LAM) conducts the interview for professional registration prior to written examination, a Graduate Architect need to pass the interview to be eligible to take the written examination for professional registration.

18. What is your opinion of the academic qualifications and practical experience prescribed by the professional board for graduates to register as professional members? Are they justifiable or otherwise?
19. Do you consider that academic qualifications should be recognised which currently are not? Do you consider that academic qualifications that are currently recognised should not be? In either case please say why.

### **5.2.5 Setting up of Practice**

There are several forms of professional practice that can be set up in accordance with the professional Acts. The provisions under the Acts allow the professional boards to register individual entitlements as a professional. A registered Town Planner and a Licensed Land Surveyor are allowed to practise under their personal capacity, just like a doctor. Contrarily, Professional Architects, Engineers and Quantity Surveyors cannot offer their professional services to others without registering their professional practice (firm) in addition to their individual registrations.

The type of professional practices that are acceptable for registration with BAM, BEM and BQSM are sole-proprietorship, partnership, body corporate and multi-disciplinary practice.

The registration of professional practice as a partnership or multi-disciplinary practice are not mentioned in the Town Planners Act 1995 and the Licensed Land Surveyors Act 1958.

Professional Acts prohibit a public corporation or a public listed company to be registered as a professional practice, thus it limits the numbers of shareholders to the maximum as allowed under the Companies Act. A shareholder in a professional practice has to be a natural person, hence, it prevents corporations or firms from being a shareholder in the professional practice. This indirectly restricts mergers to form larger companies and the formation of professional consortiums with big numbers of shareholders.

20. Do you have any suggestion how the regulation can be reviewed to encourage the setting up of bigger firms and capacity building of the existing firms?

### 5.2.6 Registration of Business

Besides registration with the professional board for the professional practice, companies and business entities are required to be registered with the Companies Commission of Malaysia (CCM). Exemptions are only given to sole-proprietorships where the registration with CCM is not necessary if the practice is registered with the professional board. The Acts and regulations dealing with the registration of a company or business are:

- i. Registration of Business Act 1956;
- ii. Companies Act 1965;
- iii. Partnership Act 1961;
- iv. Limited Liability Partnerships Act 2012;
- v. Companies Regulations 1966;
- vi. Registration of Business Rules 1957; and
- vii. Limited Liability Partnerships Regulations 2012.

Figure 5.3 Registration requirements for setting up business.

Regulator	Professional Board	CCM	
Regulations	Professional Acts	Reg. of Business Act 1956	Companies Act 1965
Individual / Sole Proprietor	Compulsory Registration	Optional Registration	n/a
Partnership	Compulsory Registration	Compulsory Registration	n/a

<b>Body Corporate</b>	Compulsory Registration	n/a	Compulsory Registration
<b>Multi-disciplinary / Consortium</b>	Compulsory Registration	n/a	Compulsory Registration
<b>Public Corporation</b>	Not allowed	n/a	Compulsory Registration

The usual type registration of professional firms with CCM are either partnership or body corporate, whereby the registration of sole-proprietor practice with CCM is optional. Conventionally, the registration of body corporates (private limited companies) are governed under the Companies Act 1965, and the registration of a partnership is governed under the Registrations of Business Act 1956. The conventional partnership setup has no limitation of liability, however, a recently enacted Limited Liability Partnerships Act 2012 will give options for practitioners to setup their partnership practices with limited liability under the Limited Liability Partnerships Act. Although the Act has been enacted, the professional Boards are yet to accept the registration of professional practices under the Limited Liability Partnerships Act 2012.

21. Is it necessary to have limited liability partnerships as another form of professional practice? If yes, should the professional boards allow both partnerships and limited liability partnerships co-exist?

**Figure 5.4 Numbers and types of practices registered with the professional boards.**

<b>Profession</b>	<b>Architect</b>	<b>Engineer</b>	<b>Quantity Surveyor</b>	<b>Town Planner</b>	<b>Land Surveyor</b>
<b>Date of data</b>	Aug 2014* <sub>1</sub>	Aug 2014* <sub>2</sub>	Aug 2014* <sub>3</sub>	Aug 2014* <sub>4</sub>	Oct 2014* <sub>5</sub>
<b>Active Professional Members</b>	<b>1,980</b>	<b>11,194</b>	<b>1,010</b>	<b>304</b>	<b>448</b>
<b>Sole Proprietor</b>	1,076	1,013	165	n/a	n/a
<b>Partnership</b>	99	203	48	n/a	n/a

<b>Body Corporate</b>	244	994	110	n/a	n/a
<b>Multi-disciplinary</b>	41	24	15	n/a	n/a
<b>Total Registered Practices</b>	<b>1,460</b>	<b>2,234</b>	<b>338</b>	<b>304</b>	<b>369</b>

Source: \*1 – Board of Architects Malaysia  
 \*2 – Board of Engineers Malaysia  
 \*3 – Board of Quantity Surveyors Malaysia

\*4 – Board of Town Planners Malaysia  
 \*5 – Land Surveyors Board Malaysia

### 5.2.7 Service Registration with Government

Besides registration with the professional board for the professional practice, the firms also need to be registered with the Ministry of Finance (MOF) as a prerequisite for delivering professional services to the government and its agencies. The registration for supply of goods and services can be done online through electronic procurement system (*e-perolehan and e-perunding*). Upon completion of registration, the professional firm is issued with a certificate of registration detailing the type of services that the firm is entitled to offer to government.

The hurdle in the registration system is the limitation to a single registration entitlement for every individual person. Any person or business owner who is registered with MOF under any company names, shall be prevented from being registered with another company name, hence, the second company cannot be registered unless the company appoints new directors and these directors are not previously registered with MOF. Further details are available at: <http://home.eperolehan.gov.my>.

22. What is your opinion on MOF's policy of not allowing a person to register more than one company?

### 5.2.8 Non- professional Statutory Registration

In conducting business, the Professionals are also required to comply with other statutory requirements and registrations, including registration for collection of Government Service Tax, GST registration, registration of business premise, registration of signboards, registration of international foreign workers permits, registration of workers permit from west Malaysia, employee income tax collection and deduction, and etc.

23. Do you think all these registration requirements are necessary? Can you identify any that you think are not needed for the Government to achieve its objectives?
24. Can you suggest ways to reduce the number of non-professional registration requirements while serving Government objectives?

### **5.2.9 Collecting taxes for the Government**

The Professionals are required to collect on behalf of the Government, the government service tax, and Goods and Service Tax (GST) due for the services received by the client. Before they are able to collect the service tax on behalf of the Government, the Professionals are required to obtain the licence from the Royal Malaysian Customs Department. The obligation to pay the Government Service Tax falls on the client, however, the obligation to collect the service tax lies on the Professional. Under the regulations, regardless whether the Professional has actually collected the service tax or not, they are obliged to pay the tax on behalf of the client within a stipulated period.

25. Why does the Government put the burden on the service provider rather than the client? What appeal provisions are available to the Professionals if they are forced to pay the tax and cannot recoup it from their clients? Can you suggest less burdensome ways for the Government to collect these taxes?

### **5.2.10 Dealing with Construction Permits**

All modern economies regulate the use of land and the construction of buildings for several reasons including to keep incompatible land uses apart and ensure cities can deliver many different sorts of facilities and services. The objectives are achievable through rigorous control of building codes, zoning and land use.

Dealing with construction permits is one of the main tasks delivered by the Professionals. Due to continuous delays in dealing with construction permits, in 2010, PEMANDU initiated the Property Development Lab to study and analyse REHDA's concerns in dealing with property development. This resulted in 22 key initiatives, four of which relate directly to building permits (REHDA, 2010):

- Initiative 1: Streamlining Approval Process,
- Initiative 3: Pre-consultation,
- Initiative 10: Building Plan Approval Elimination,
- Initiative 11: PSP Self-Certification.

While most of the initiatives have been implemented by various agencies, the highlighted four initiatives were not implemented pending detail deliberation and setting up mechanisms for implementation. Various technical working groups and focus groups have also been established to coordinate the efforts of the public and private sectors to further improve construction and property development. For example, the Focus Group on Dealing with Construction Permits (FGDCP) was established by PEMUDAH (2012) and the OSC 3.0 plan submission system was introduced in June 2014. In addition to the OSC procedures in dealing with construction permit, the Professionals need to deal with various regulations related to land development, planning permission and construction permit including the following Acts:

- i. National Land Code 1965 (Act 56)
- ii. Town and Country Planning Act 1976 (Act 172)
- iii. Street, Drainage and Building Act 1974 (Act 133)

The three main Acts on land, planning and buildings empower the regulators to formulate various regulations, by laws and orders in regulating the activities related to land developments, planning permission and building constructions. However, these are not the only Acts empowering the establishment of regulations governing the land development and building construction, there are also provisions under other Acts empowering the regulator to establish several regulations related to land development and building construction.

26. Do you think the 22 initiatives formulated from PEMANDU Property Development Lab 2010 are the best way to ease the dealing with construction permits and encourage property development? If not, what alternatives do you think would be better?
27. What do you think of the four initiatives which relate directly to building permits?
28. Is it necessary to have requirements relating to land development in many Acts or could the requirements be streamlined to fewer Acts? If so, which ones? Are any of the requirements inconsistent? Do the construction Professionals have to supply the same information concerning land development more than once whether to the same or different regulators?

### **5.2.11 Issuance of the Certificate of Completion and Compliance**

The Certificate of Completion and Compliance (CCC) system was launched on 12 April 2007, to replace the Certificate of Fitness for Occupation (CFO) issued by the local authorities under the Street, Drainage and Building Act 1974 (SDBA). CCC is issued by a Principal Submitting Person (PSP) who is defined in SDBA as a Professional Architect, Professional Engineer or building draughts man registered with the Board of Architects Malaysia.

It is the Government's view that CCC would cut down on red-tape and ensure that house buyers and building owners get to move in as quickly as possible without compromising their safety. This is consistent with the Government's desire to encourage self-regulation, which was introduced in the National Economy Growth Planning strategy to continuously enhance the delivery system.

The CCC system also ensures that Vacant Possession (VP) for housing projects can be issued together with CCC. This is intended to overcome problems previously associated with CFO where home buyers receive the house keys (upon submission of Form E) but cannot move into the houses because the CFO has not been issued.

Before CCC can be issued, the project works need to be completed in accordance to the approved Building Plans and PSP has supervised the works accordingly. All G Forms duly filled and certified, clearances or confirmation of supply and connection to six essential services agencies – TNB (confirmation of electrical supply), state water services company (confirmation of water supply), sewerage services company (confirmation of connection to sewerage treatment plant or mains), Department of Safety and Health (clearance for lifts and machinery installations), Fire and Rescue Services Department (clearances for passive design and active firefighting systems installation except for residential buildings not more than 18m high) and Local Government's Roads and Drainage Department (clearance and acceptance of road and drainage works).

While the objective of obtaining clearance from the relevant departments is good, it may causes unnecessary burdens if all clearances are not obtained in a timely manner and the PSP may have to make several follow ups with the relevant departments.

29. Do you think the CCC creates unnecessary burdens or is it necessary? Can you suggest ways to achieve the intended objective while reducing regulatory burdens? What has been your experience in getting the G form signed by the contractor in good time? Are there terms in the regulations which make it particularly difficult to get the required signatures?

### **5.2.12 Green Technologies**

A Green building focuses on increasing the efficiency of resource use energy, water, and materials while reducing building impact on human health and the environment during the building's lifecycle, through better siting, design, construction, operation, maintenance, and removal. International research confirms that green building consume less energy, less water and generate less waste, and create a healthy and productive environment for employees.

The launch of the National Green Technology Policy (NGTP) in 2009 is a manifesto of the government's seriousness in implementing "green" initiatives for the country. These include, among others, intensification of green technology research and innovation towards commercialisation, promotion and public awareness of green technology. Specifically, for buildings, the government promotes the application of renewable energy (RE) and energy efficiency (EE) in buildings such as solar photovoltaic (PV), rainwater harvesting, phasing out of incandescent lights, and the application of green building index. Green Technology Financing Scheme (GTFS) was announced in the National Budget 2010 that supports GT and green buildings.

In April 2009, Malaysian Institute of Architects (PAM) and the Association of Consulting Engineers Malaysia (ACEM) supported by Malaysia Green Building Confederation (MGBC), together with the building industry launched the Green Building Index (GBI) to enable green grading and certification of Malaysian buildings. GBI which was formulated and promoted by PAM and ACEM, assesses the impact of a new building on its environment based on six criteria namely; energy efficiency, indoor environment quality, sustainable site and management, materials and resources, water efficiency, and innovation.

While these initiatives are intended to pursue important goals, it is important to ensure that they are effective and do not impose unnecessary regulatory burdens on business nor restrict competition.

30. What is your experience with these regulatory requirements? Do you consider they impose any unnecessary burdens? Can you suggest ways to achieve the intended objectives while reducing burdens on construction Professionals?

### **5.2.13 Completion / Termination of Practice**

Upon retirement or termination of professional practice, the practitioner may opt to terminate his/her practice licence with consent from the respective professional boards. Termination of practice licence may be by voluntary termination by the professional or by regulatory enforcement by the professional boards. Professional boards may exercise their power to cancel the professional registration through provisions of the Acts.

Voluntarily termination can be achieved by the Professional informing to the relevant professional board his/her intent to retire, cancel registration or close the practice. Supporting documents such as evidence for completion of all works under supervision, and discharge from responsibility from the ongoing works (Letter of Release) are required to be presented together with the application. Voluntarily cancellation of registration may also be chosen by the Professional by not renewing the annual subscription.

Even after the application to terminate professional registration has been accepted, architects and engineers remain individually responsible for the completed works that they

have previously certified, carrying professional liability personally for life. This contrasts with the Company Act 1965 which allows limited liability.

31. Do you think life-time responsibility is justified in order to achieve accountability or not? What public interest or market failure does it serve? Would there be other ways to achieve accountability without imposing this lifetime burden on architects and engineers?

#### **5.2.14 Liberalisation of Professional Services**

In a move to spur economic growth and attract foreign direct investment (FDI), the Government has taken measures to ensure an efficient and competitive business environment via its Competition, Standards and Liberalisation (CSL) Strategic Reform Initiatives (SRI). The Ministry of International Trade and Industry (MITI) is entrusted to lead all efforts pertaining to the liberalisation exercise. Covering the services and financial services sector, the liberalisation exercise was undertaken in stages. The initial stage commencing in 2009 saw nine sub-sectors being liberalised and a further 18 sub-sectors were liberalised in 2011, allowing up to 100% foreign equity participation in phases. The 18 sub-sectors include the Architectural, Engineering and Quantity Surveying services.

In 2012, BAM, BEM and BQSM submitted proposals to amend the present Acts to allow liberalisation by opening some shares in local firms to be held by foreign investors. The proposed amendments to the Acts were debated and passed in Parliament in November 2014. Although the Town Planners and Land Surveyors are not included under the 18 sub-sectors, with liberalisation of the Architectural, Engineering and Quantity Surveying services, the former may also be indirectly affected.

Globally, the Organization for Economic and Cooperation Development foresees a substantial increase in foreign investment if foreign equity restrictions are removed. At the end of 2013, Malaysia's share of FDI is below par compared to other ASEAN countries. Based on figures for the first half of 2012, 67.5% (RM 52.5 billion) of total foreign investment came from the service sector investment. Any Acts and regulation for each professional service needs to be in line with and in support of the liberalisation move.

30. How could the establishment of bigger firms be encouraged in order to improve international competition? Should the professional Acts be reviewed to allow more foreign equity to build up bigger working capital?

References

- COAC, C. I. d. A. d. C. (2005). *Architectural Practice Around the World*. Catalunya: COAC International.
- Malaysia, G. o. (2010). *Tenth Malaysia Plan 20011-2015*. Kuala Lumpur: Percetakan Nasional Malaysia Berhad.
- Malaysia, G. o. (2014). *Gross Development Product 2005-2013*. Kuala Lumpur: Department of Statistics, Malaysia
- PEMUDAH. (2012). PEMUDAH Annual Report 2012. In S. T. F. t. F. B. (PEMUDAH) (Ed.), (pp. 75). Kuala Lumpur: Special Task Force to Facilitate Business (PEMUDAH).
- REHDA. (2010, 31 May 2014). PEMANDU Property Development Lab Report 2010. Retrieved 31 May 2014, 2014
- UNESCO. (2010). ENGINEERING: ISSUES CHALLENGES AND OPPORTUNITIES FOR DEVELOPMENT. Paris: United Nations Educational, Scientific and Cultural Organization (UNESCO).
- World Bank. (2012). *World Development Indicators 2012*: World Bank Publications.

**MALAYSIA PRODUCTIVITY CORPORATION (MPC)  
REGULATORY REVIEW:  
PROFESSIONAL SERVICES TO THE CONSTRUCTIONS INDUSTRY**

**EXPRESSION OF INTEREST**

**Please complete and submit this form with your submission:**

By email: [alamin@mpc.gov.my](mailto:alamin@mpc.gov.my) / [asrin@mpc.gov.my](mailto:asrin@mpc.gov.my)

OR by fax: (03) 7960 0206

Or by post: Malaysia Productivity Corporation

A-06-01, Tingkat 6, Blok A, PJ8,

No.23, Jalan Barat, Seksyen 8,

46050 Petaling Jaya, Selangor

**Organisation**.....

**Street address**.....

**City**..... **State & Postcode**

**Postal address**.....

**City**..... **State & Postcode**

**Principal contact** ..... **Phone** .....

**Position**..... **Fax** .....

**Email address** ..... **Mobile** .....

**Please indicate your interest in this review:**

Be informed of developments including receiving the draft report.

Would like to be interviewed by MPC.

Would like to make a submission.

Nature of your activity

Architecture

Engineering

Quantity Survey

Land Survey

Town Planning

Other (please state) \_\_\_\_\_