

# 建筑图提呈 - 由建筑师还是工程师？

作者: 赖玟璇博士 | 2025 年 3 月 30 日

自 2007 年推行完工与合规证书 (Certificate of Completion and Compliance, CCC) 制度以来, 主提呈人 (Principal Submitting Person, PSP) 与提呈人 (Submitting Person, SP) 的概念被引入, 以作为建筑项目中签发完工与合规证书的责任方。《1984 年统一建筑附则》将主提呈人和提呈人定义为合格人员, 包括建筑师、持有执业证书的专业工程师 (Professional Engineer with Practising Certificate, PEPC) 或注册建筑绘图员, 他们有权进行图纸提呈<sup>[1]</sup>。通常, 主提呈人或提呈人会分别向地方政府的内部技术部门以及外部技术机构提呈相关图纸。下表概述了由建筑师与持有执业证书的专业工程师分别负责的提呈类型:

表 1: 建筑师与持有执业证书的专业工程师提呈类型一览表

单位	建筑师	PEPC
地方政府内部技术机构	建筑图* - 建筑部门	建筑图 (土木与结构)** 土方工程图 (土木与结构) - 工程部门 道路与排水计划图 (土木与结构) - 工程部门.
外部技术机构	被动消防图 - JBPM***	被动消防图 (土木与结构) - JBPM***
		给水管网 (土木与结构) - Water Dist. Company
		污水管道计划图 (土木与结构) - IWK***
		道路与排水计划图 (土木与结构) - JKR***
		道路与排水计划图 (土木与结构) - JPS***
		主动消防图 (机械) - JBPM***
		通信网络 (电力) - TM & SKMM***
		电力供应 (电力) - TNB***

\* 详见附录 A、B、C

\*\* 土木与结构工程师

\*\*\* JBPM : 马来西亚消防与拯救局 (Jabatan Bomba dan Penyelamat Malaysia)  
IWK : 英达水务公司 (Indah Water Konsortium)  
JKR : 公共工程局 (Jabatan Kerja Raya)  
JPS : 排水与灌溉局 (Jabatan Pengairan dan Saliran)  
TM : 马来西亚电讯 (Telekom Malaysia)  
SKMM : 马来西亚通讯及多媒体委员会 (Suruhanjaya Komunikasi dan Multimedia Malaysia)  
TNB : 国能有限公司 (Tenaga Nasional Berhad)

根据《1974 年街道、排水与建筑法》, “建筑图则”是指包括场地平面图、位置图、楼层平面图、剖面图和立面图, 并在根据本法制定的任何附例中有具体规定的图则。“提交人”是指根据本法或其下制定的任何附例, 向地方当局或相关法定机构提交非建筑图则的合格人士, 并包括接手该合格人士的职责与责任或代表该合格人士行事的任何其他合格人士。而“合格人员”则包括注册建筑师、PEPC 或注册建筑绘图员<sup>[2]</sup>。

在马来西亚, 与许多国家一样, 未委任建筑师或 PEPC 将带来以下法律与实际风险:

- a) 违反建筑法规、规定与合规要求, 可能导致罚款、诉讼或停工。
- b) 增加建筑缺陷、结构失效与安全隐患风险, 危及住户与工人安全。
- c) 易出现施工质量不达标, 导致返工、延误与客户不满。
- d) 因返工、诉讼等增加项目成本, 影响开发商与投资者回报。
- e) 破坏公司或项目声誉, 影响未来发展机会与业内关系。

通常建筑图由建筑师提呈，但工厂类建筑可由 PEPC 提呈。这一点与 2020 年 6 月 2 日马来西亚建筑师委员会 (Board of Architects Malaysia, BAM) 与马来西亚工程师委员会 (Board of Engineers Malaysia, BEM) 联合发布的通告第 009 号一致。该联合备忘录修订后的附录如下：

附录 A: 除非为建筑师，任何人不得提呈下列项目的建筑图、报告或规格书；但如涉及非标准性工程，则应由具执业证书的专业工程师提呈<sup>[3]</sup>。

<b>A</b> Airport terminal building Amusement centre Apartment Aquarium Art gallery Assembly hall Auditorium Aviary  <b>B</b> Bowling centre Bus terminal building  <b>C</b> Cabaret Cable car terminal Cafeteria/Canteen Casino Church Cinema (drive-in, covered) Civic centre Clinic Community centre Conference hall/centre College (secretarial, technical, vocational) Creche Crematorium Cultural centre  <b>D</b> Dance hall Departmental store Dispensary Domestic house  <b>E</b> Eating house Embassy Emporium Exposition hall  <b>F</b> Ferry terminal building Fire brigade Flat Funeral parlour	<b>G</b> Golf club Grandstand Gymnasium  <b>H</b> Handicraft centre Hawker centre Holidays resort Hospital Hotel  <b>K</b> Kindergarten  <b>L</b> Law court Library  <b>M</b> Market (open-air, closed) Mausoleum Memorial Mosque Motel Music hall  <b>N</b> Neighbourhood housing (housing scheme) Nursing home  <b>O</b> Office building Old-age home Opera house Orphanage  <b>P</b> Palace Parliament house Plant nursery Police station Post & telegraph office Prison Private club Professional Institute	<b>R</b> Race course Railway station building Rehabilitation centre Research & laboratory testing centre Restaurant Rest house  <b>S</b> Sanatorium School (primary, secondary, vocational) Shophouse Shopping centre Showroom Skating rink (ice rollers) Supermarket Space needle Sports complex Surau Swimming club  <b>T</b> Telecom building Temple Theatre Town hall Tourist promotion project Trade centre T.V., Radio centre  <b>U</b> University complex  <b>V</b> Vocational training centre  <b>Y</b> Yacht club  <b>Z</b> Zoo
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图 1: 由持有执业证书的专业工程师提交的图则

附录 B: 除非为具执业证书的专业工程师, 任何人不得提呈下列项目的建筑图、工程图、报告或规格书; 但如涉及建筑设计, 则应由建筑师提呈<sup>[3]</sup>。

<b>A</b> Airport runway & apron Air-conditioning & mechanical ventilation system  <b>B</b> Bulk handling complex Bridge  <b>C</b> Cable car system Car parking mechanical system Causeway Cement plant Chimney Crane gantry Crushing plant Coffers dam Colliery  <b>D</b> Dam Distillation & desalination plant Dock Drainage scheme Dredging & reclamation work  <b>E</b> Earthwork Electrical distribution system & stage lighting Electrical services installation Electrical switchroom Embankment Environmental pollution control plant  <b>F</b> Flood bund Foundation Fire protection service  <b>G</b> Gaswork Gravity retaining wall & gabion Grinding plant  <b>H</b> Harbour	<b>I</b> Infrastructural service Incinerator  <b>J</b> Jetty  <b>L</b> Liquid waste disposal plant  <b>M</b> Mass rapid transit system Marine structure & facility Mechanical service Mine Mining  <b>O</b> Oil refinery plant Oil & gas tank  <b>P</b> Parade ground Piling Pipe line Plumbing service Port Proprietary standard beam/truss Public address system Pumping ground Pumping station  <b>Q</b> Quarry Quay  <b>R</b> Reclamation Refinery Refrigeration installation & cold store Retaining wall (major) Roadside furniture & traffic signal Roadwork, (public) Reservoir	<b>S</b> Sanitary installation system (for multi storey building) Sewerage work Slipway Solid waste disposal plant Structural system Stabilising earth structure Storage tank Storm sewer & drain Subsoil drainage system Subway Surface railway  <b>T</b> Taxiway Transmission tower Tunnel T.V. transmission tower  <b>U</b> Underground railway  <b>V</b> Ventilation system  <b>W</b> Water distillation plant Water distribution line (hot/cold water service) Waterwork Water & waste water & environmental pollution control plant Wharf
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图 2: 由持有执业证书的专业工程师提交的图则

附录 C: 下列项目的建筑图、报告或规格书必须由建筑师或具执业证书的专业工程师提呈；若包含附录 A 项目，须由建筑师提呈；若包含附录 B 项目，须由持有执业证书的专业工程师提呈<sup>[3]</sup>

<b>A</b> Abattoir Aerated water factory Aircraft assembly plant Aircraft maintenance workshop & hangar Aircraft manufacturing plant  <b>B</b> Boat house (shed) Boiler house Brewery Brickwork (factory) Bus depot & workshop  <b>C</b> Carparking – multi-storey (standalone) Car parking layout (open) Chemical plant Chimney (domestic) Compressor house  <b>E</b> Electrical substation Engineering laboratory  <b>F</b> Fencing & gate Flatted factory Footing  <b>G</b> Glue factory Glass work (factory) Godown Grandstand (uncovered)  <b>H</b> Helicopter port	<b>I</b> Ice factory Integrated industrial development* Integrated petrol station development **  <b>J</b> Jute mill (building)  <b>M</b> Manufacturing, assembling, processing, repair plant & associated building & facility Marine Mill Minor earthwork Motor vehicles service station  <b>N</b> Nuclear power station  <b>P</b> Paper mill/factory Perimeter drain work of building within private boundary Pharmaceutical plant Plywood factory Prefabricated structure Power station (thermal hydro & nuclear) Printing work Private roadwork Pumping station (building)  <b>R</b> Rubber factory Rubber processing mill and smoke house Refuse chute system	<b>S</b> Sanitary & plumbing installation to domestic house, shophouse & school Satellite tracking station Septic tank construction & soak away pit Shipyard Silo Single storey factory (with or without mezzanine floor) Swimming pool & ancillary work Steel mill Space research centre Standard patented structure Store building  <b>T</b> Tannery Timber work (sawmill) Textile plant Timber structure  <b>U</b> Underground railway station Utilities building  <b>V</b> Vegetables oil mill & refinery factory  <b>W</b> Wall (dwarf, facing & decorative & other non-structural type) Warehouse Workshop
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图 3: 由建筑师或持有执业证书的专业工程师提呈的图纸

## 表格 F, F1 and G1 – G21

只有主提呈人可签署表格 F 或 F1（见表 2）；而表格 G1–G21 应由项目相关的提呈人签署，其对应关系请参考下列表格。

表 2: 表格 F 与 F1 中各部分的主提呈人<sup>[4]</sup>

表格	内容	PSP
F	完工与合规证书 (CCC)	建筑师 / PEPC (土木)
F1	部分 CCC	建筑师 / PEPC (土木)



表 3: 表格 G1–G21 各部分的提呈人<sup>[4]</sup>

表格	内容	SP
G1	土方工程	PEPC (土木/ 岩土)
G2	放样地位	土地测量师
G3	地基	PEPC (土木/ 岩土.)
G4	结构工程	PEPC (土木/ 结构)
G5	室内给水管道	PEPC (机械./ 土木/ 建筑师)
G6	室内排污	PEPC (机械./ 土木/ 建筑师)
G7	室内电力	PEPC (电力)
G8	被动消防	建筑师/ PEPC (土木)
G9	主动消防	PEPC (机械)
G10	机械通风	PEPC (机械)
G11	升降机/扶梯安装	PEPC (机械/ 电力)
G12	建筑结构	建筑师/ PEPC (土木)
G13	外部供水系统	PEPC (土木)
G14	污水系统	PEPC (土木)
G15	污水处理系统	PEPC (土木)
G16	外部供电系统	PEPC (电力)
G17	道路与排水系统	PEPC (土木)
G18	街道照明	PEPC (电力)
G19	外部主排水系统	PEPC (土木)
G20	电信系统	PEPC (电力)
G21	景观设计	景观建筑师

## 总结

在马来西亚，完工与合规证书的签发必须由主提呈人承担责任。根据 BEM 于 2020 年发布的第 009 号通告，无论是建筑师还是 PEPC，只要符合附录 A、B、C 所列的范围，皆可担任主提呈人并负责建筑图提呈，项目完工后签发表格 F。而 G1–G21 的表格则由提呈人根据实际工作内容签署。

在建筑行业中，未委任合资格的建筑师与工程师，将导致法律风险、安全隐患、经济损失及声誉受损。项目各方应高度重视专业人员的参与，以确保合规、安全、如期完成项目，并保障公众利益。

## 赖玟璇博士

首席执行官/ 创始人

IPM 环球集团

## 参考文献：

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\*\*本中文译本仅供参考之用。如中文译本之文义与英文原文有歧义，概以英文原文为准。