

# BUILDING PLAN SUBMISSION - BY ARCHITECT OR ENGINEER?

Author: Ir. Dr. Justin LAI Woon Fatt | 30 March, 2025

With the enactment of the Certificate of Completion and Compliance (CCC) in 2007, the Principal Submitting Person (PSP) and Submitting Person (SP) were introduced as the party to issue CCC for buildings. The Uniform Building By-Laws (UBBL) 1984 defines the PSP and SP as the Qualified Person which includes Architect, Professional Engineer with Practising Certificate (PEPC), or Registered Building Draughtsman authorized in handling submission<sup>[1]</sup>. In general, the PSP/SP will handle submissions for different internal departments in Local Authority (LA) and External Technical Agencies (ETA). The table below outlines the type of submission handled by the respective architect and PEPC.

*Table 1: Submission type by Architect and PEPC*

Agency	Architect	PEPC
Internal Technical Agencies in LA	Building Plan* – Building Dept.	Building Plan (C&S)** Earthwork Plan (C&S) – Engineering Dept. Road & Drainage Plan (C&S) – Engineering Dept.
External Technical Agencies	Bomba Passive Plan – JBPM***	Bomba Passive Plan (C&S) – JBPM***
		Water Reticulation (C&S) – Water Dist. Company
		Sewerage Plan (C&S) – IWK***
		Road & Drainage Plan (C&S) – JKR***
		Road & Drainage Plan (C&S) – JPS***
		Bomba Active Plan (Mech.) – JBPM***
		Communication Network (Elec.) – TM & SKMM***
		Electrical Supply (Elec.) – TNB***

\* Refer to Appendices A, B and C.

\*\* Civil & Structural Engineer

\*\*\* JBPM : Jabatan Bomba dan Penyelamat Malaysia / Fire and Rescue Department of Malaysia

IWK : Indah Water Konsortium

JKR : Jabatan Kerja Raya / Public Work Department

JPS : Jabatan Pengairan dan Saliran / Department of Irrigation and Drainage

TM : Telekom Malaysia

SKMM : Suruhanjaya Komunikasi dan Multimedia Malaysia / Malaysian Communications and Multimedia Commission

TNB : Tenaga Nasional Berhad

According to the Street, Drainage and Building Act 1974, “building plans” means plans that include site plans, key plans, floor plans, sections, and elevations as set out specifically in any by-laws made under this Act. A “submitting person” means a qualified person who submits plans other than building plans to the local authority or relevant statutory authority in accordance with this Act or any by-laws made thereunder and include any other qualified person who takes over the duties and responsibilities of or acts for the first mentioned qualified person. Meanwhile, a “qualified person” means an Architect, PEPC, or building draughtsman registered under any written law relating to the registration thereof<sup>[2]</sup>.

In Malaysia, as in many other countries, there are legal and practical consequences for not appointing Architects and PEPC in the building industry, which includes but not limited to:

- Legal violations of building codes, regulations, compliances and laws governing construction. This can lead to legal penalties, fines, or even project shutdowns.
- Higher risk of construction defects, structural failures, and safety hazards, potentially endangering the lives of occupants and workers.
- Higher likelihood of substandard workmanship, which can lead to costly repairs, delays, and dissatisfaction among stakeholders.

- d) Neglecting to appoint qualified professionals can lead to cost overruns due to rework, delays, and legal expenses. Additionally, subpar construction quality may affect property values and rental income, resulting in financial losses for developers and investors.
- e) Failing to adhere to industry standards and best practices can damage the reputation of construction companies, developers, and other stakeholders involved in the project. This can impact future business opportunities and relationships within the industry.

Submission of building plans are usually submitted by Architect except for factories, which can be submitted by PEPC. This also aligned with BEM Circular No. 009 dated 2<sup>nd</sup> June 2020 made by a Joint Committee between the Board of Architects Malaysia (BAM) and Board of Engineers Malaysia (BEM) concerning the submission of building plans by Architect and PEPC. The revised appendices in the Joint Memorandum are as follows:

*Appendix A: No person shall submit any Building Plan, report and specification for the under-listed works and/or services, unless he is an Architect, except where any engineering work is required (excluding any standard engineering work), such engineering plan and specification shall be submitted by a Professional Engineer with Practising Certificate <sup>[3]</sup>.*

<b>A</b> Airport terminal building Amusement centre Apartment Aquarium Art gallery Assembly hall Auditorium Aviary	<b>G</b> Golf club Grandstand Gymnasium	<b>R</b> Race course Railway station building Rehabilitation centre Research & laboratory testing centre Restaurant Rest house
<b>B</b> Bowling centre Bus terminal building	<b>H</b> Handicraft centre Hawker centre Holidays resort Hospital Hotel	<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>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>K</b> Kindergarten	<b>T</b> Telecom building Temple Theatre Town hall Tourist promotion project Trade centre T.V., Radio centre
<b>D</b> Dance hall Departmental store Dispensary Domestic house	<b>L</b> Law court Library	<b>U</b> University complex
<b>E</b> Eating house Embassy Emporium Exposition hall	<b>M</b> Market (open-air, closed) Mausoleum Memorial Mosque Motel Music hall	<b>V</b> Vocational training centre
<b>F</b> Ferry terminal building Fire brigade Flat Funeral parlour	<b>N</b> Neighbourhood housing (housing scheme) Nursing home	<b>Y</b> Yacht club
	<b>O</b> Office building Old-age home Opera house Orphanage	<b>Z</b> Zoo
	<b>P</b> Palace Parliament house Plant nursery Police station Post & telegraph office Prison Private club Professional Institute	

Figure 1: Submission of plans by Architect

Appendix B: No person shall submit any Building Plan, including Engineering Plan, report and specification for the underlisted works and/or services, unless he is a Professional Engineer with Practising Certificate, except where any architectural work is required, such architectural plan shall be submitted by an Architect <sup>[3]</sup>.

<b>A</b> Airport runway & apron Air-conditioning & mechanical ventilation system	<b>I</b> Infrastructural service Incinerator	<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>B</b> Bulk handling complex Bridge	<b>J</b> Jetty	<b>T</b> Taxiway Transmission tower Tunnel T.V. transmission tower
<b>C</b> Cable car system Car parking mechanical system Causeway Cement plant Chimney Crane gantry Crushing plant Coffers dam Colliery	<b>L</b> Liquid waste disposal plant	<b>U</b> Underground railway
<b>D</b> Dam Distillation & desalination plant Dock Drainage scheme Dredging & reclamation work	<b>M</b> Mass rapid transit system Marine structure & facility Mechanical service Mine Mining	<b>V</b> Ventilation system
<b>E</b> Earthwork Electrical distribution system & stage lighting Electrical services installation Electrical switchroom Embankment Environmental pollution control plant	<b>O</b> Oil refinery plant Oil & gas tank	<b>W</b> Water distillation plant Water distribution line (hot/cold water service) Waterwork Water & waste water & environmental pollution control plant Wharf
<b>F</b> Flood bund Foundation Fire protection service	<b>P</b> Parade ground Piling Pipe line Plumbing service Port Proprietary standard beam/truss Public address system Pumping ground Pumping station	
<b>G</b> Gaswork Gravity retaining wall & gabion Grinding plant	<b>Q</b> Quarry Quay	
<b>H</b> Harbour	<b>R</b> Reclamation Refinery Refrigeration installation & cold store Retaining wall (major) Roadside furniture & traffic signal Roadwork, (public) Reservoir	

Figure 2: Submission of plans by PEPC

Appendix C: No person shall submit any Building Plan, report and specification for the under-listed works and/or services unless he is either an Architect or a Professional Engineer with Practising Certificate, except where any building under Appendix A is included, the plan needs to be prepared by an Architect and where any building under Appendix B is included, the plan needs to be prepared by a Professional Engineer with Practising Certificate <sup>[3]</sup>.

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

Figure 3: Submission of plans by Architect or PEPC

### Form F, F1 and G1 – G21

Only the Principal Submitting Person (PSP) can sign Form F or F1 (refer table 2), and Form G1 – G21 (refer table 3) shall be signed by the Submitting Person (SP) of the project which is based on the appendices stated above, and components are to be in accordance with the tables below.

Table 2: PSP for components in Form F and F1 <sup>[4]</sup>

Forms	Component	PSP
F	Certificate of Completion and Compliance (CCC)	Architect / PEPC (Civil)
F1	Partial CCC	Architect / PEPC (Civil)

Table 3: SP for components in Form G1 – G21 [4]

Forms	Component	SP
G1	Earthworks	PEPC (Civil/ Geotech.)
G2	Setting Out	Land Surveyor
G3	Foundations	PEPC (Civil/ Geotech.)
G4	Structural	PEPC (Civil/ Structural)
G5	Internal Water Plumbing	PEPC (Mech./ Civil)/ Architect
G6	Internal Sanitary Plumbing	PEPC (Mech./ Civil)/ Architect
G7	Internal Electrical	PEPC (Elec.)
G8	Fire-fighting (Passive)	Architect/ PEPC (Civil)
G9	Fire-fighting (Active)	PEPC (Mech.)
G10	Mechanical Ventilation	PEPC (Mech.)
G11	Lift/Escalator Installation	PEPC (Mech./ Elec.)
G12	Building	Architect/ PEPC (Civil)
G13	External Water Supply System	PEPC (Civil)
G14	Sewerage Reticulation	PEPC (Civil)
G15	Sewerage Treatment Plan	PEPC (Civil)
G16	Ext. Electrical Supply System	PEPC (Elec.)
G17	Road and Drainage	PEPC (Civil)
G18	Street Lighting	PEPC (Elec.)
G19	Ext. Main Drainage	PEPC (Civil)
G20	Telecommunication	PEPC (Elec.)
G21	Landscape	Landscape Architect

## Conclusion

In Malaysia, the issuance of CCC is a responsibility that borne by a PSP. With reference to BEM Circular No. 009 in 2020, both Architect and PEPC can act as PSP to submit building plans where the work is under-listed according to Appendix A, B and C, and finally issue the Form F when the project is completed. Meanwhile, for G1-G21 forms, the SP shall bear responsibility for different components according to the scope of work.

Failure to appoint qualified architects and engineers in the building and construction industry in Malaysia can lead to a range of serious consequences, including legal liabilities, safety hazards, financial losses, and damage to the project's reputation. It is crucial for all parties involved in construction projects to prioritize the engagement of qualified professionals to ensure compliance, safeguard public welfare, and ensure the timely and successful completion of the project.

## Ir. Dr. Justin LAI Woon Fatt

CEO/ Founder

IPM Group

### References:

[1] Uniform Building (Amendment) By-Laws 2021. Street, Drainage and Building Act 1974. Retrieved on 30<sup>th</sup> March 2025 from <https://jkt.kpkt.gov.my/wp-content/d/sites/default/files/2022-01/PEWARTAAN%20UKBS%201984%20SECARA%20G.N%20%28GAZETTE%20NOTIFICATION%29.pdf>

[2] Laws of Malaysia. (2014). Street, Drainage and Building Act 1974 (Act 133). Retrieved on 30<sup>th</sup> March 2025 from <https://www.ppj.gov.my/storage/7476/133---STREET,-DRAINAGE-AND-BUILDING-ACT-1974.pdf>

[3] Board of Engineers Malaysia. (2020). Circular No. 009. Submission of Building Plans by Professional Engineers with Practising Certificate and Architects. Retrieved on 30<sup>th</sup> March 2025 from <https://bem.org.my/uploads/ISO/ProfessionalPractice/db18fa092f138ff96359e0813d97cdc8.pdf>

[4] Board of Engineers Malaysia. (2018). Circular No. 007. PEPC Endorsement on Certificate of Completion and Compliance (CCC) and Form Gs. Retrieved on 30<sup>th</sup> March 2025 from <https://bem.org.my/uploads/ISO/ProfessionalPractice/c148fdeb7588f2472de7138333b3aac4.pdf>