



EVOLUTION OF ACQUISITION OF LAND IN MALAYSIA: ACCOMMODATING SUSTAINABLE DEVELOPMENT AND HUMANITY FAIRNESS

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Abstract:

Land is very important for public and private ownership. Public ownership needs land for development and the provision of public amenities and infrastructure to the people. Meanwhile, private ownership is critical for people's wellness. However, compulsory land acquisition in Malaysia plays an important role in the development of the country's public infrastructure and amenities while considering private ownership. In order to support development goals and approaches, land acquisition laws and frameworks must change over time. Different methods of development and technological advancements necessitate the creation of specific laws to handle the development process. This study uses a qualitative methodology to examine how Malaysian land acquisition laws have changed over time, taking into account all of the changes made to the Land Acquisition Act 1960 [Act 486]. The study's key conclusions include how the current land acquisition laws are dynamic and adaptable to different development strategies while maintaining the public interest. However, it is suggested that in order to provide the legal framework, it must go above and beyond in predicting the future development strategy.

Keywords:

Fairness, Land Acquisition, Land Law, Sustainable Development.

Introduction

Every nation is striving towards excellence, especially in physical development. Most countries develop their countries for the good of the nation and the people. Development in physical and economics is very important for such goals (Peprah et al., 2019). Thus, physical development that consists of constructing and building infrastructure requires land resources.

Land resources are usually tied to development and economic growth (Noor & Ramli, 2017). Discussion on economic development focusing on the land as the factor market and primary resources for production. Most of the land provision is for the agricultural sector. While, in physical development, the development needs land for its foundation. In the construction and development sector, land is vital for developers may it be from the private as well as public sector.

The issue of land scarcity for development and agriculture creates conflict between them. In addition, the scarcity also leads to the conflict between public and private ownership (Adshead, 2014; Cordes, 1999). The issue of ownership leads the discussion on balancing private and public interests (Cordes, 1998). Yet, the government still pursued the development of infrastructure for public purposes, resulting in public well-being.

Across the world, the need for land can result in land acquisition. Depending on the *lex loci* – the law of the land, different countries possess unique sets of land laws. Thus, it is more towards local matter within the boundaries of the countries instead of being global in nature.

In Malaysia, the options to acquire land for physical development, the construction and building of public amenities and infrastructure, may come from land purchase, application of land from the state government, land swapping and compulsory land acquisition. The compulsory land acquisition refers to the compulsory land acquisition under the Malaysian Land Acquisition Act 1960 [Act 486]. This legislation, as well as the nature of land acquisition in Malaysia, is quite similar to the eminent domain, compulsory purchase and expropriation of land around the world.

Thus, this paper will discuss the evolution of land law in tackling land scarcity through its land law, especially Act 486. This preliminary study is part of the research on the land acquisition process in Malaysia. In addition, the discussion will explore the evolution of the law with respect to its function in fulfilling sustainable development goals and balancing fairness towards the aggrieved parties involved in the process.

Research Methodology

This study engaged the exploration approach with qualitative research methods. References are mostly from the literature review and the library study. The main materials are from the records of legislation drafting and debates. There are available resources from the Parliament of Malaysia as recorded in the Debates of the Parliament called “Hansard”. A total of 14 copies of the Hansard Parliament of Malaysia have been reviewed thoroughly.

In conducting this study, reference was also made to the first-hand resource of expert participants from the government department, especially from the Department of Director General of Lands and Mines (Jabatan Ketua Pengarah Tanah dan Galian Persekutuan – JKPTG). Personnel from this public agency is important and reliable as the JKPTG is the responsible agency purveying the land legislation which among others are the National Land Code [Act 828], the Land Acquisition Act 1960 [Act 486], the Strata Title Act 1985 [Act 318].

Interviews and discussions are conducted to gain insights from the personnel from the JKPTG as well as the experts who are currently retired and transferred to a new agency, who are people of tacit knowledge of institutional knowledge. The respective personnel are the desk officer of the subject and the team for the amendment of the legislation.

Findings

Historical Background

Gaining independence in 1957, the Federation of Malaya at that time was not coming from a scratch nation. The country had been struggling to gain sovereignty over the country for its own autonomy. Over the years, before the establishment of the Federation, the law of the land is almost there. It is reported that several states have implemented Islamic law (Faruqi, 2017) or Mohammedan law¹.

The records show that the land laws were enacted in each and every state which later formed the Federation. The land law is under the powers of the King – *Raja* or *Sultan* – of the states. The king owned the land under its territory, confined to the borders between the states. The land law for the states is simplified as in Table 1. This list is only limited to the fundamental land legislation, whereas there are also other land-related legislations such as customary land.

Table 1: Land Law for Each States²

Regime	States	Legislation	Code
Federated States	Malay	Selangor	F.M.S Land Code Cap. 138
		Perak	
		Pahang	
		Negeri Sembilan	
Unfederated States	Malay	Perlis	Perlis Land Enactment 1356
		Kedah	Kedah Land Enactment 1912 No. 56
		Kelantan	Kelantan Land Enactment 1938
		Terengganu	Terengganu Land Enactment 1357
		Johor	Johor Land Enactment 1910 No.1
Straits Settlement		Melaka	Land Ordinance Cap.113
		Penang	

Source: Author's Compilation

¹ Mohammedan law is the other reference to the Islamic law. <https://www.umlawreview.com/lex-in-breve/malaysian-legal-system-an-introduction>.

² Structured from several resources, mainly from INSTUN's notes Malaysia. INSTUN is the centre of excellence in land administration and survey. Read together with the National Land Code [Act 828] (NLC).

As to the fundamental or supreme law on land matters is the National Land Code [Act 828] (NLC), it was only codified in 1965 and in force in 1966. As such, the reading of the land acquisition law needs to be read together with the previous law in respect of the acquisition before the NLC comes into force.

Land Acquisition

The law on land legislation is said to be enacted by consolidating the previous land law as in Table I which comprises of part of the land acquisition matter and by inserting the other elements relating to land acquisition into Act 486. It is reported that at least five (5) different laws are on this matter (The Government Press, 1960). The law on land acquisition is enacted in the Parliament of Malaysia by virtue of Article 76(4) of the Federal Constitution. After the Federation of Malaya was established, the land law was still handed over to the states forming the power of the states until forming Malaysia, as enumerated in the Ninth Schedule, Second List – State List, Federal Constitution of Malaysia.

However, as mentioned above, the Federal Constitution provides that any law can be enacted by the Parliament as to the uniformity of the law across the states. As such, the Land Acquisition Act 1960 [Act 486] has been enacted under this power given by the Federal Constitution and applicable to all the states in the Federation, but excluding Sabah and Sarawak which came into the Federation and formed Malaysia later in 1965³.

Amendment of the Law

Act 486 was amended with a dynamic and pragmatic approach. The law has been amended in about 10 series of amendments starting from the date of enforcement of Act 486. The series of amendments can be summarized as in Table 2. All the amendments are done by JKPTG in respect of the need for development. As it started to enforce in 1960, the first amendment took place in 1971, and was reviewed from time to time until the last amendment in 2016.

Table 2: List of Amendments of Act 486⁴

Amending Law	Short Title	In Force From
Act A49	Land Acquisition (Amendment) Act 1971	30-04-1971
Act A216	Land Acquisition (Amendment) Act 1973	13-10-1960
Act A336	Land Acquisition (Amendment) Act 1976	27-02-1976
Act A387	Land Acquisition (Amendment) Act 1977	18-03-1977
Act A388	Land Acquisition (Amendment) (No. 2) Act 1977	27-02-1976
Act A575	Land Acquisition (Amendment) Act 1984	20-01-1984
Act A804	Land Acquisition (Amendment) Act 1991	13-09-1991
Act A852	Land Acquisition (Amendment) Act 1993	16-07-1993
Act A999	Land Acquisition (Amendment) Act 1997	01-03-1998
Act A1517	Land Acquisition (Amendment) Act 2016	01-12-2017 except section 11

Source: Author's Compilation

³ Any reference to Malaysia in the context of land acquisition is referred to Peninsular Malaysia only.

⁴ Gathered from the sources within Act 486 and cross-referred to Attorney Generals' Chamber Malaysia for the respective amending acts.

According to Hazlina⁵, the officer in charge of the amendment in 2016 from JKPTG, the amendment of land law is complicated. This is because the amendment needs to be agreed upon by all the states while considering the issues raised by them. As such, several rounds of consultation and buy-in need to be done by JKPTG in order to discharge the task of amending the land law. This is agreed by Anesh⁶ and Yati⁷ from the same department, but in different divisions which coordinate the amendment of land legislation.

In addition, the amendment of the law, especially land law in this instance, needs to be done in two (2) cycles, which are the first cycle of getting the policy direction from the Cabinet and another round of cycle for the approval of the bill from the Cabinet before tabled in the Parliament. According to Anesh (2024), this cycle of land law amendment needs to be revisited as the changes are not pictured in the current document⁸ and by the guidelines published by JKPTG for internal reference (Jabatan Ketua Pengarah Tanah dan Galian, 2009).

Drafting the Legislation

In the course of amending the legislation, there are several stages involved in several departments. As mentioned in the previous section, there are two (2) cycles involved. In addition, the respective agency also needs to discuss the amendment with the legal counsel from the department as well as the Parliamentary draftsmen in the Attorney's General Chamber of Malaysia.

Different practices in Malaysia and other countries, the draft of the amendment will be prepared by the respective agency and will be perused by the respective authority, the Attorney General's Chamber. While, in another country, the draft will be done by the legal authority according to the policy direction given. In this stage, several engagements will be conducted to ensure the details of the proposed amendments.

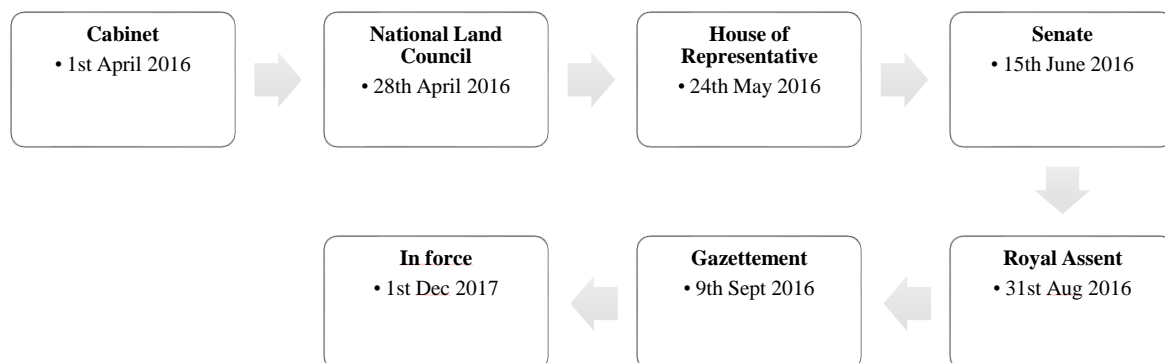


Figure 1: Authors' Illustration of The Drafting And Amendment Process Flow Based On The Amendment In 2016.

Source: Author's Illustration

⁵ Hazlina Musa, Principal Assistant Director, Land Acquisition Division, JKPTG (2016).

⁶ Anesh A/L Ganeson, Subject Matter Expert (SME) - Principal Assistant Director, Policy and Research Division, JKPTG.

⁷ Yati Musa, Assistant Director, Policy and Research Division, JKPTG.

⁸ Slides of Briefing on the Amendment of Land Law by JKPTG as of 2011.

This exercise provides a better understanding of the amendments, and the purpose of the legislation drafted. Figure 1 shows the process flow in drafting and amendment to the land law especially Act 486 in 2016.

Discussions

Land Development

There are several important amendments to Act 486. One of them, Act 486 had a significant modification in 1984. It is apparent during this time that the nation began to shift from an agricultural to an industrial country. The government's priorities have changed to take the industrial revolution into account. In that phase, time is critical for transitioning from traditional to novel activities. In industrialized nations, time is a critical component of progress and is highly valued.

Therefore, the property that serves as the foundation for development, the land in this case, must be ready within the allocated period. The land law changed again for this reason, the time for the land acquisition process is defined by the legislation itself. The timeline was incorporated into the Act to demonstrate the government's development efficiency.

The Act was subsequently updated in 1992 which is important for the land development in Malaysia. The significant changes concerning the use of land acquired under Act 486 are included in this updated version. It refers to the change of land use of the acquired land from its initial purpose during the application. These issues have been debated in Parliament as the public outcries on the fair and just treatment to the aggrieved parties from the implementation of Act 486.

The privatization strategy⁹ and Vision 2020¹⁰ which was introduced by the Prime Minister of Malaysia at that particular time, has a significant influence on how land development will proceed (Prime Minister's Office, 2024) (Prime Minister's Office, 2024). Once again, the legal framework changed as a result of acknowledging development in a more comprehensive way, expanding the scope of land acquisition to include any objective that advances Malaysia's economic growth.

The scope of Act 486 extends beyond public utilities to include the initial goal of the legislation about compulsory land acquisition. It also does not limit its applicability to public utilities as defined by the Act. An illustration of its scope is presented in Figure 2. The opening of a new area for agricultural purposes also invoked Act 486 for its application and acquisition of land. This action has been challenged as the opening of new agricultural areas is not for the benefit of the public, but for the benefit of economic development as well as for the well-being of certain groups or classes of the public.

⁹ The privatization refers to the concept of outsourcing the public amenities and infrastructure to the private entity.

¹⁰ Vision 2020 is the policy concept introduced by the Prime Minister of Malaysia in 1990s to bring the nation into developed countries.

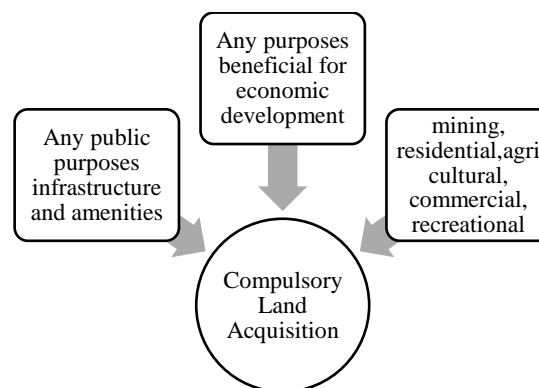


Figure 2: Authors' Illustration On The Purpose Of Land Acquisition, Adapted From Section 3 Of Act 486.

Source: Author's Illustration

Sustainable Development

Looking into the findings, Hansard shows that the amendment of the law can be categorized as a responsive approach. Most of the amendments are responsive in nature where there are actual scenarios happening in the field. The development of physical infrastructure in Malaysia starts to intensify within the shifting period from agriculture towards industrialization.

As the world witnesses the Millennium Development Goals (MDG) initiative in the 2000s, the goal is to eradicate poverty through 8 pillars of MDGs. At the end of 2015, a new era was set up to pursue a sustainable future, the Sustainable Development Goals (SDG). These series of goals and targets are set up on the background of social development. A slight shift from physical development to social aspects (United Nations, 2023). Although the MDG and SDG are quite new as compared to the amendment of Act 486, but the concept of social development in the development is a long-standing principle.

The shift in the global level also shapes the individual countries, likewise Malaysia. The physical development which requires land as the foundation of physical development, must be in line with the approach of the world trajectory, development with the essence of sustainability.

In accommodating this feature, Malaysia comes out with Vision 2020. Again, this Vision 2020 shapes the policy and the legislation of the country, spilling over to Act 486. The debate in Parliament on the amendment of the Act noticed that the amendments were done partially to cater to and steer the development into social economic development (Percetakan Nasional Malaysia Berhad, 1991). More infrastructure is needed but the government needs to balance the interests of the parties, public and private, for the sustainable development of the nation.

Furthermore, to drive further on sustainable development, the implementation of land acquisition must be controlled and managed properly. In 1998, the Government of Malaysia once again scrutinized the process of land acquisition and managed to control the usage of land acquisition especially for economic growth and commercial as provided under paragraphs 3(1)(b) and 3(1)(c) of Act 486. The element of check and balance is inserted in the process for the land acquisition by going through the inspection and examination by the "Economic Planning Unit" – at the point of amendment – for the viability of the project and land acquisition.

The KL Gateway project, for example, has embarked on land acquisition under section 3(1)(c) to prepare the land for development, but still fulfil the requirement set forth by the element of check and balance of the planning authority and State Authority. The project proponent needs to prepare the social needs while the work is in progress including moving the resident to a temporary housing area together with the “lifestyle” – the school arrangement and the *pasar malam* (night market) – in that area¹¹.

Therefore, the development and land acquisition from this point of view is tackling sustainable development through the evolution of Act 486. It can be seen through the implementation of land acquisition for current Mass Rapid Transit (MRT) projects or the redevelopment of residential areas such as KL Gateway mentioned above, which successfully considered the sustainable development of social development, public amenities and physical development.

Humanity Fairness

Meanwhile, the account of humanity's fairness can initially be detected in the amendment in 1975 where the new principles regarding the payment of compensation consider several elements such as the determination of the price from the value in the declaration of intended acquisition under section 4 of Act 486 (“House of Representatives, Fourth Parliament, First Session,” 1975). This value although not in favour of the aggrieved parties, but it is good for government expenditure and benefits the public in the long run for the infrastructure.

In advancing the development of the country, the issue is also raised in the segmented price and value of the land. As the development is non-biased, the coverage area is borderless and crosses categories of land. This invites an argument on the economic growth for Malays as the land ownership for Malays is related to the Malays Reserved Land (MRL)¹². The value of the MRL land is lower compared to the land which is open to the public. Hence, the valuation of Malay Reserved land is also at stake and needs attention in implementing land development for economic growth beyond ownership and an open market.

The important portion of the amendment underlined by the Minister during the introduction of the amendment to Act 486 as he mentioned (*translated*)—

*"Since it came into force in 1960, the Act has been amended several times. The previous amendments were made on a number of administrative and procedural matters. This time, the entire Act has been reviewed in detail. The basic matters and principles are given **special attention with the aim of enabling the landlords involved to get a more perfect justice** from various angles."* (Jabatan Percetakan Negara, 1983)(*emphasis added*)

Thus, the amendment in 1984 surfaces these issues and the amendment suggests a new valuation principle for Malay Reserved land (MRL) (Jabatan Percetakan Negara, 1983). From the amendment, the value of the land needs to be associated with the nature of the development. This means that, if the development is for the benefit of the public at large, thus the value must be an open market price. Otherwise, the land is valued as an MRL market if the development benefits only the Malays.

¹¹ Records from Authors' experience and briefing by the project proponents in 2014.

¹² Malay Reserved land refers to land area as specified in the Malay Reserve Enactments which is subjected to States Enactments and differs across the states in Malaysia.

Amendments in 1984 are more than that. Several other issues are tackled to provide fairness to the public. The validity of the declaration under section 8 of Act 486 is limited only to 2 years, which must be completed until Form G of Act 486 within the time limit, failing which is considered void.

The changes in the socio-economic status of the country mark another evolution of land acquisition matters. Land acquisition matters will surely be discussed regarding the issue of payment of compensation. The payment of compensation is a vital part of the land acquisition matters. Moreover, it is mentioned clearly in the Federal Constitution of Malaysia that “*No law shall provide for the compulsory acquisition or use of property without adequate compensation*”¹³. Changes in the development approach as well as changes in the political socioeconomic activities and status of the country affect the compensation scheme. Compensation scheme not only on its value, but it extends to new principles in the compensation scheme.

In addition, there is a due date imposed for the payment of compensation. It is decided that the payment of compensation must be completed in time which is 3 months, and the aggrieved parties are entitled to late payment charges of 8% per annum in case there is a default of payment.

Rapid growth and extensive usage of Act 486 for development purposes opens up a new opportunity to increase the value of the land. However, the increment of the value of the land might be on the dark side of the development for the public and the government. For example, the issue of land speculators has been addressed in the debate in the House of Representatives. It can be traced from the report as follows:

“There is a marked tendency on the part of land speculators to move in and buy up lands around those growth centres in the hope of cashing in on increasing prices as those centres develop. In these areas, if the Government is to acquire land under the present interpretation of the market value, the Government is required to pay these inflated prices.” (“House of Representatives, Fourth Parliament, First Session,” 1975)

As a result, the amendment to the law is necessary as part of an initiative to curb the issue of land price speculations.

Thus, the proposed amendment to the law is presented to Parliament in an action to overcome the issue of land price by limiting the compensation scheme only to the value of land and not the potential value after the development. The compensation scheme can be looked at in the First Schedule of the Act. The schedule comprises several schemes in determining the payment of compensation. The amendment of the Act significantly affects the compensation scheme and shows the evolution of the law.

As the value of the land increases over time, the evolution of the law also reflects the fairness in determining the value of compensation for the objections and challenges in Court. The amendment in 2016 had increased the eligibility criteria for the matter to be brought to the Court. The amendment increased the eligibility according to the value of the compensation

¹³ Article 13 (2), Federal Constitution of Malaysia.

from RM3,000.00 to RM5,000.00 and from RM15,000.00 to RM30,000.00 respectively for the landowner and the applicant as specified under section 37 of Act 486.

Thus, the amendment of the Act through time always considers humanity fairness. It covers all aspects of human rights but is limited to the legislation in force. The marginalized groups are not directly mentioned in the amendment, but the aggrieved parties have been allowed to produce their claims for compensation through a private valuer. Similarly, the Indigenous people have also been considered with due diligence according to the current legislation of the Aboriginal Peoples Act 1954 [Act 134], which needs to be read together to construe their rights based on the gazetted area. However, incorporating the rights into Act 486 itself might give better weightage instead of the current practice of payment of ex-gratia.

Emerging Developments

The last amendment in 2016 of Act 486 is also a massive exercise. This amendment is done concurrently with other two (2) land legislations which are the National Land Code [Act 828] (NLC), and the Strata Titles Act 1985 [Act 318]. The main purpose of the amendment is to cater for the emerging development approach in Malaysia.

The emerging development approach in Malaysia is referred to the vertical development, upwards and downwards (Mohamed et al., 2023). The development of stratified buildings is not only for residential purposes but also for commercial purposes. This comes from the idea of mixed development. However, this mixed development is not purely for commercial purposes, but also consists of public amenities and infrastructure.

As that is the case, the amendment of Act 486 must be in parallel with the concept and enforcement of Act 318. To avoid conflict and enhance the workability of the developments, the legislation must be amended in consequence of another amendment to the legislation.

Moreover, the public infrastructure now is going downwards, which is underground. It may have been done in developed cities and countries like the metro in London, United Kingdom, or New York, United States of America, but it is quite new in Kuala Lumpur, Malaysia. Thus, this emerging development needs to be supported by the enabling legislation. The land acquisition is required for the underground development such as Mass Rapid Transit (MRT) as pictured in Figure 3 below.

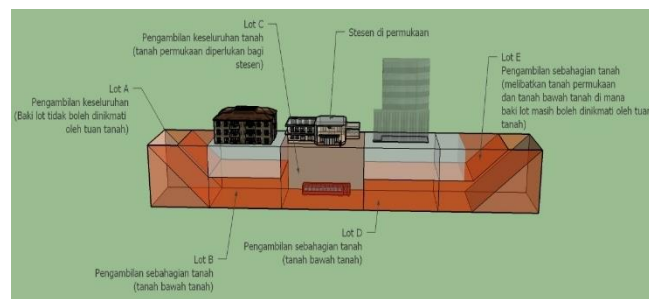


Figure 3: Illustration Of Underground Land Acquisition In An Emerging Development (Mohamed, 2017).

Source: JKPTG's presentations

As the development approaches are currently different, the issues arise from the land acquisition as land acquisition for the underground development. It is worth to note in the case of *Dr Dzul Khaini Hj Husain (Dr Dzul Khaini Hj Husain & Ors v. Director Of Lands And Mines Office (Kuala Lumpur) & Ors (No 3) [2016] 9 CLJ 847, 2016)*, the case involves the underground land acquisition, together with the issues of stratified buildings on the surface of the land. The acquisition of underground land cannot be invoked as the amendment is not yet in force. Thus, the land acquisition needs to be done as usual compulsory land acquisition, which includes the building on the surface of the land. The building seems one of the earliest shopping complexes in Kuala Lumpur which needs to be abolished due to the need for an underground station for Mass Rapid Transit (MRT), a railway track. This situation occurs because the amendment to the legislation is not in place and not enforced yet at the time of land acquisition.

Nonetheless, amendments to the legislation are vital in development to enable and accommodate current scenarios and approaches. Time is of the essence in the development as well as the legislation, to ensure the development runs smoothly and to secure the rights of public and private property.

Conclusion

The study finds that the amendment of land legislation, especially Act 486, is responsive and pragmatic. It shows that the current land acquisition laws are dynamic and adaptable to different development strategies while maintaining the public interest. However, it is suggested that in order to provide the legal framework, it must go above and beyond in predicting the future development strategy.

The legal framework on land acquisition should further be considered to include humanity fairness by reviewing the First Schedule of Act 486 to enhance the compensation scheme as a response to the emerging development. In addition, policy considerations should also deliberate the viability of joint-venture development and public participation in the decision-making of the proposed development to further harmonize the physical development, social development and humanity fairness in parallel with sustainable development targets.

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References

- Adshead, J. (2014). Revisiting the ideologies of planning law: Private property, public interest and public participation in the legal framework of England and Wales. *International Journal of Law in the Built Environment*, 6(1), 174–193. <https://doi.org/10.1108/IJLBE-10-2013-0038>
- Cordes, M. W. (1998). The Public/Private Balance in Land Use Regulation. *Law Review*, 681–701. <http://ssrn.com/abstract=2808563>
- Cordes, M. W. (1999). Property Rights and Land Use Controls: Balancing Private and Public Interest. *Northern Illinois University Law Review*, 19, 629–655. <http://ssrn.com/abstract=2803580>,~RSITYNC.209.
- Dr Dzul Khaini Hj Husain & Ors v. Director Of Lands And Mines Office (Kuala Lumpur) & Ors (No 3) [2016] 9 CLJ 847, 9 Federal Constitution, arts 847 (2016).

- Faruqi, S. S. (2017, November 27). *Malaysian Legal System - An Introduction*. University of Malaya Law Review.
- House of Representatives, Fourth Parliament, First Session. (1975). In *Parliamentary Debates: Vol. I* (Issue 87).
- Jabatan Ketua Pengarah Tanah dan Galian. (2009). *Panduan Pindaan Perundangan Tanah*. JKPTG.
- Jabatan Percetakan Negara. (1983). House of Representative, Sixth Parliament, First Session. In *Parliamentary Debates: Vol. I* (Issue 66).
- Mohamed, A. H. (2017). *Akta Pengambilan Tanah (Pindaan) 2016 [A1517]*.
- Mohamed, A. H., Ismail, N., & Mohd, K. W. (2023). Conflict of Law and Policy in Land Development. *Malaysian Journal of Syariah and Law*, 11(2), 180–186. <https://doi.org/10.33102/mjssl.vol11no2.433>
- Noor, S. I. M., & Ramli, N. R. (2017). Financial Growth and Economic Development: Evidence from Malaysia. *International Journal of Academic Research in Business and Social Sciences*, 7(10). <https://doi.org/10.6007/ijarbss/v7-i10/3393>
- Peprah, J. A., Kwesi Ofori, I., & Asomani, A. N. (2019). Financial development, remittances and economic growth: A threshold analysis. *Cogent Economics and Finance*, 7(1). <https://doi.org/10.1080/23322039.2019.1625107>
- Percetakan Nasional Malaysia Berhad. (1991). House of Representatives, Eight Parliament, First Session. In *Parliamentary Debates: Vol. I* (Issue 67).
- Prime Minister's Office. (2024). *Perspektif Wawasan 2020*. Prime Minister's Office. https://www.pmo.gov.my/dokumenattached/Dasar/22PERSPEKTIF_WAWASAN_2020.pdf
- Prime Minister's Office. (2024). *Penswastaan*. Prime Minister's Office. <https://www.pmo.gov.my/dokumenattached/Dasar/21PENSWASTAAN.pdf>
- The Government Press. (1960). House of Representatives. In *Parliamentary Debates: Vol. II* (Issue 22).
- United Nations. (2023). *The Sustainable Development Goals Report 2023* (Special Edition).