

PROBLEMATIC HOUSING PROJECT POST COVID-19 PANDEMIC AND PROPRIETOR'S FUTURE DIRECTIONS IN MALAYSIA

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ABSTRACT

The COVID-19 pandemic has adversely affected global social well-being and economics. Malaysia's housing industry has seen a slow movement in the housing development construction activity. The industry has been technically and economically affected as a result of temporary closure of business operations during the Movement Control Order ("MCO"). In addition, the spike in positive cases of COVID-19 among foreign workers has also had affected the continuity or smooth flow of housing development construction and completion. Although the Temporary Measures for Reducing the Impact of Coronavirus Disease 2019 (COVID-19) Act 2020 ("COVID-19 Act") was enacted to overcome the industry's economic position relating to the affected "statutory periods" in Housing Development (Control and Licensing) Act 1966, this intervention has not fully overcome the problem of abandoned and delayed ("problematic") housing projects in the country. The country's existing situation regarding problematic housing development projects could be further worsened and prolonged by the COVID-19 pandemic economic situation. In a problematic housing project, the development land would most possibly be in a stagnant economic position. This paper analyses the issue of problematic housing projects from the viewpoint of land proprietors' rights over development lands in overcoming the problematic housing project occurrence. The land proprietors in this study are not the proprietor-cum-developer landowners. This paper employs a qualitative legal research by analysing the relevant statutory provisions and judicial decisions. It is found that the proprietor, being the legal owner of the development land, has significant and definite rights in catalysing the continuity and completion of the problematic housing development project. The findings of this paper are expected to contribute to Malaysia's housing development policy, where the proprietor could be acting as a "real" white knight of the said problematic housing development project.

Key words: COVID-19; infeasibility; land proprietor; land development rights; problematic housing project.

INTRODUCTION

The issue of problematic housing projects has existed in the pre-COVID-19 times. Problematic housing projects are projects that classified as "abandoned" and "delay" by the Ministry of Housing and Local Government (or "the MHLG"). Among the causes of problematic housing projects are developer's financial difficulties, ineffective regulatory system, project mismanagement, unfair business dealings, bad economic conditions, and complex housing policies (Ariffin et al., 2019). New addition to the list is the COVID-19 pandemic, which also contributes to the occurrence of country's problematic housing project (Esa et al., 2020). The said pandemic has caused COVID-19 clusters within the Malaysian property construction and development industries which were majorly contributed by the positive cases among foreign construction workers (Director-General of Health, 2021, 2020; Wahab, 2020). It has also adversely affected the Malaysia's economic and social well-being (Mofijur et al., 2020; Shah et al., 2020).

However, it is predictable that the existing problematic housing projects would not totally and easily solved upon the cessation of COVID-19 pandemic. This is due to the interrelation between the problematic housing project situation and the country's socio-economic position. The high demand and supply in housing industry would contribute to the country's economy, and reciprocally, the rapid economic growth would boost the country's housing development industries (Chai et al., 2015; Kam et al., 2018; Kamal et al., 2016; Masram & Misnan, 2019; Mohd-Rahim et al., 2019; Tan, 2011). The issues of problematic housing project are not only limited to the failures of developers and purchasers in their contractual obligation fulfilment, the time extension against the late payment and late delivery charges, and the appropriate existing rehabilitation measures by the authorities (Abdul-Rahman et al., 2016; Chai et al., 2015; Kamal et al., 2016; Mohamad & Hassan, 2020; Phang & Tan, 2016), but also include the uncertain role or rights of proprietors in managing the semi-developed lands, of which the land ownerships have not been transferred from the proprietors to the purchasers. The study on proprietor's rights or role in problematic housing project is inadequate as compared to that of the other parties in housing industries. The proprietors that usually having inactive roles in housing development projects are also adversely affected since their lands are partially or incompletely developed by the developers. The rights of the proprietors of private or individual lands are uncertain as to whether they have the rights to interfere or involve in the delayed or abandoned housing development projects, or to take part in the rehabilitation process. Thus, it is probable that a proactive measure could be taken by the proprietor to overcome the issue of problematic housing projects during the mid- and post- COVID-19 pandemic period.

PROBLEMATIC HOUSING PROJECT SITUATION DURING THE COVID-19 PANDEMIC PERIOD IN MALAYSIA

As of December 2020, 67 cases of abandoned housing projects that involved 15,041 housing units with 10,127 affected purchasers have been reported by the MHLG (Ministry of Housing and Local Government [MHLG], 2020a, 2020b, 2020c). From these numbers, only 62.7% of the abandoned projects were being rehabilitated and considered for rehabilitation, while the remaining 37.3% were in static positions pending rehabilitation or action. As many as 287 delayed cases (MHLG, 2020d, 2020e, 2020f)

might possibly add to the above abandoned project statistics if they are not successfully curbed. Even if the said delayed projects were to be declared as abandoned, it would not ensure its project completion. This is because the MHLG's rehabilitation process may not necessarily involve physical rehabilitation (project completion), but could also include other types of "rehabilitation", namely, purchasers' deposit refund, development method changes and state government acquisition (MHLG, 2019). In addition, the rehabilitation process would require the participation and commitment of all relevant parties (Dahlan, 2006). It is argued that landowners (termed as "proprietors" in this paper) might also be part of the relevant parties.

A surplus of 42 delayed cases has been recorded during the pandemic year of 2020 (MHLG, 2020d, 2020e, 2020f). This situation shows that the COVID-19 pandemic contributes to the occurrence of problematic housing projects in Malaysia. The Movement Control Order ("MCO") which was enforced on 18 March 2020 resulted in an economic downturn and a slow movement in the housing industry (Esa et al., 2020). As a transitory action, the Temporary Measures for Reducing the Impact of Coronavirus Disease 2019 (COVID-19) Act 2020 ("COVID-19 Act") was enacted to overcome the industry's economic position. Part XI of the COVID-19 Act relating to housing industry merely covers the affected "statutory periods" in the Housing Development (Control and Licensing) Act 1966 ("the HDA"), namely, the late payment charges (section 34), the delivery of vacant possession and liquidated damages (section 35), and the defect liability period (section 36) that was in effect from 18 March 2020 to 31 August 2020, and with an approved extension until 31 December 2020. Briefly, Part XI of the COVID-19 Act provides temporary measures to reduce the impact of COVID-19 on the affected purchasers and developers.

Although the said periods could be extended with the Minister's approval, these deferments would not totally and objectively overcome the existing and lasting issues of problematic housing projects in Malaysia. The regulation would only act as an impermanent effort in allowing the "uncalculated delay" in housing development project completion. Technically, this position would not curb the occurrence of problematic housing projects that affected or caused by the economic conditions of COVID-19 pandemic, or that existed before the COVID-19 pandemic period. In addition, the COVID-19 Act does not accommodate any project rehabilitation clause relating to problematic housing projects. In consequence, the issues of problematic and uncompleted housing projects would be prolonged and could be worsened by the uncertain and unprecedented COVID-19 pandemic situation. Hence, an alternative solution based on a relevant party's legal position is proposed to overcome the problematic housing projects that not only caused by the COVID-19 pandemic economic situation, but also projects that resulted from other causes.

PROPRIETOR'S SIGNIFICANT POSITIONS IN PROBLEMATIC HOUSING PROJECT

The COVID-19 pandemic would not only affect the business of a developer and the property acquisition of a purchaser, but also the land value of a proprietor. A proprietor's undeveloped land would continually be in a stagnant economic position upon the occurrence of problematic housing project (Abdul-Aziz & Kassim, 2011, Sulong & Taha, 2016). A proprietor is the legal owner of the development land under the National Land Code 1965 ("the NLC"). Statutorily, the proprietor would transfer his land title to the purchaser upon the completion of housing development project by the developer. Based on the above statistics, 56% of the static abandoned project cases (14 of 25) have come to a standstill, with undecided positions of further action or rehabilitation by the liquidators (MHLG, 2020c). The static status in abandoned projects indicates the incapability of developers or liquidators in completing or continuing the problematic housing projects. This situation would then practically require other relevant party's initiatives and proactive actions, specifically the proprietor in rescuing and completing the said problematic project.

Hypothetically, the proprietor's *locus standi* would be beneficial in overcoming problematic housing project situations. The proprietor is a significant party in a development agreement with the developer of a housing project, whereby the proprietor grants his development rights over the land to the developer. The granted development rights would entitle the developer of his right to possess the land, but maintain the proprietor's land ownership. However, a subsequent statutory sale and purchase agreement (as provided in Schedules G, H, I and J of the HDA) would bind the proprietor as the transferor of the completed housing unit titles to the purchasers. This position would create a trust on the proprietor towards the purchasers. The resulting constructive trust from the operations of both agreements puts a responsibility upon the proprietor to ensure that the housing development project is completed. Thus, the proprietor's significant positions as the legal owner of development land in the development agreement, and the transferor of title in the statutory sale and purchase agreement provide the need for analysis of proprietor's available rights in rescuing the problematic housing project.

METHODOLOGY

This paper employs a qualitative legal research. A qualitative research includes the exploration and understanding of social and legal issues while developing the procedures through data analysis and interpretation (Creswell, 2013; Hess, 2014). A doctrinal legal research method was used in analysing the legal data from primary legal sources, in particular, the statutory provisions on housing and land laws (i.e., the HDA and NLC), and judicial decisions on problematic housing projects involving proprietors. A doctrinal method is the core research method in legal analysis (Hutchinson & Duncan, 2012). The analyses of "rule of interpretation" and "doctrine of binding precedent" were adopted for legal and statutory interpretations, and the judicial examinations (Hamzah, 2009; Vohrah & Wu, 2000) of proprietor's rights in the case of problematic housing projects.

In analysing the situation and condition of problematic housing projects in Malaysia during the pre- and mid- COVID-19 pandemic, the secondary data were gathered and from the MHLG's website. Data on the problematic housing projects were analysed based on the statistics of categorized abandoned and delay housing projects. In addition, the analysis of the proprietor's legal rights was based on the Malaysian statutory provisions and decided judgments. The analysed legal cases are the decided Malaysian Court cases on problematic housing projects that involved development or collaboration agreements between the non-developer landowners (proprietors) and non-proprietor housing developers (developers). The legal cases were obtained from legal databases,

namely the Current Law Journal and Lexis Nexis. The aspects of proprietor's rights are identified based on the proprietor's recognized actions through the court's judgments of each case. It is important to include the land concepts of indefeasibility of title and caveatable interest in the analysis of proprietor's rights to ownership and possession, before the analysis of proprietor's rights to secure completion. The findings from the analyses are then used to further recommend a policy amendment as an alternative solution to overcome the occurrence of problematic housing projects.

PROPRIETOR'S LEGAL RIGHTS ON DEVELOPMENT LAND

Based on the statutory provisions and judicial decisions, the proprietor's positions and rights in rescuing and completing the problematic housing project has been analysed. Hence, this paper has identified two significant rights that are discussed below, namely (1) the proprietor's rights to ownership and possession, and (2) the proprietor's rights to secure completion, that would crucially allow and permit the proprietor's action to rescue and complete the problematic housing project despite the unspecified proprietor's direct statutory involvement upon problematic housing project occurrence.

Proprietor's rights to ownership and possession

The Torrens system concept of indefeasibility of title and interest is inseparable from that of a registered legal owner. The concept is statutorily incorporated under section 340 of the NLC. Theoretically, a proprietor's ownership and indefeasibility would remain throughout the construction and occurrence of a problematic housing project, i.e. before the title transfer. However, the operations of development agreement and statutory sale and purchase agreement could challenge the ideal function of the indefeasibility concept, particularly when completing the housing project. The said concept could be applicable and functional within the sphere of contractual and equitable operations (Sihombing, 1992), and within the legal provision of section 206(3) of the NLC (Mohamad, 2008). In a competing ownership position, the proprietor's indefeasibility of a problematic housing development land could be affected by the developer's subsequent entered agreement. The superiority of the proprietor's indefeasibility was shown in the Court of Appeal case of *Eliprop Sdn Bhd v Yeo Ping Tieng & Ors and Another Appeal*¹. The entered land-sale and purchase agreement and development agreement between the second respondent (land-purchaser) and the previous developer were superseded by the appellant's (subsequent proprietor's) indefeasibility. It was held that the second respondent did not acquire the good title from the original proprietor based on the unendorsed agreement position. The subsequent entered land-sale and purchase agreement between the previous developer and appellant that was endorsed by the original proprietor thus entitled the appellant to its indefeasibility and ownership. It is asserted that the indefeasibility concept had been carefully scrutinized in determining the competing purchasers' good title and ownership of a problematic housing development land.

The granted caveatable rights by the proprietor could also challenge proprietor's ownership and possession in a problematic housing project. However, this beneficial interest should be analysed within its land position and entitlement in the development agreement. In the Federal Court case of *Score Options Sdn Bhd v Mexaland Development Sdn Bhd*², the judge held that the developer's granted caveatable rights did not amount to a registrable interest since the developer was not a registrable person under the NLC. The agreement merely provided the developer's interest in profit, but not in land. The grant should be in the NLC's prescribed manner that involves a registrable interest in the land. This position would be different if such rights are granted based on the developer's land position and entitlement as held in the case of *Zemine Development Sdn Bhd v Hong Kong Realty Sdn Bhd*³. Hence, the proprietor's ownership and position in a problematic housing project could be defeasible by the developer's caveat relating to land interest been provided in the said development agreement.

Thus, this paper asserts that the proprietor's legal positions that based on the concept of indefeasibility of title and interest, and specified caveatable interest in land significantly shows the proprietor's rights to ownership and possession over the development land.

Proprietor's rights to secure completion

The legal intention of the HDA is to protect the interests of the purchaser. Several amendments to the HDA have been made to protect such interests, e.g., criminal sanction for non-completion (section 18A), purchasers' statutory termination (section 8A), and additional housing delivery system (Schedules I and J) in overcoming the problematic housing project. The amendments seem to specifically deal with the unperformed developer, but these positions do not totally exclude the proprietor from any liability when the proprietor is also a party in the statutory sale and purchase agreement. Although the development agreement between the developer and proprietor is based on private mutual agreement, the proprietor's connection to the HDA is irrefutable. The connection can be seen in the Federal Court case of *Foong Seong Equipment Sdn Bhd v Keris Properties (PK) Sdn Bhd and Another Appeal*⁴, where it was highlighted that the HDA had been applied in the entered development agreement. At the appeal court level, the judge asserted that the development agreement was part of the housing development, of which the proprietor is "part and parcel" of the HDA. This position suggests that the proprietor could and should be involved in the completion of a problematic housing project.

¹ [2017] 10 CLJ 257

² [2012] 7 CLJ 802

³ [2009] 5 CLJ 218

⁴ [2011] 4 CLJ 1

The proprietor's position as the legal owner could be utilised in rescuing a problematic housing project. In the Federal Court case of *Silver Corridor Sdn Bhd v Gallant Acres Sdn Bhd & Anor*⁵, the proprietor (second respondent) had re-acquired the rights to rescue and complete development from the wound-up developer (first respondent) through a settlement agreement made between them. The settlement agreement had been constantly upheld in the High, Appeal, and Federal Courts despite the trial issues of appellants' (purchasers') voidable sale and purchase agreements. The Federal Court agreed with the lower courts' decision that the sale and purchase agreements were void against the liquidators and would be of a preference over the other creditors. This position shows that the proprietor could act as a rescuer to problematic housing projects, despite the developer's insolvent position for the benefit of all involved parties.

The developer's incapability to perform would also allow for a proprietor's action in ensuring the project completion. In the Court of Appeal case of *Tiarasetia Sdn Bhd v Yayasan Selangor & Anor*⁶, it was held that the proprietor's (first respondent's) action of agreement termination with the developer (appellant), and collaboration with a new developer (second respondent) were appropriate in securing the development completion. The proprietor's action was made on the basis of non-completion risks, i.e. loss of development land and legal action from the purchasers. The developer's anticipatory breach (of terminating a construction agreement with a contractor) would lead to the developer's incapability to perform since the developer did not have the development license to construct the project. This position shows that the proprietor has the right to determine the direction and completion of the problematic housing project for the benefit of the purchasers.

Thus, this paper asserts that the proprietor's legal positions as the legal owner of the land compared to developer's incapability in rescuing the problematic housing project significantly shows the proprietor's rights to secure the completion of problematic housing project.

CONCLUSION AND RECOMMENDATION

The above identified proprietor's rights could be utilized in assisting and facilitating the completion of a problematic housing project. Although the development rights are granted to the developer through a development agreement, those rights could be superseded by the proprietor's exclusive position of a legal owner. Based on proprietor's legal position as the legal owner of the land, it is found that the proprietor still owns his land rights, namely, the rights to ownership and possession, and to secure completion, despite the unsuccessful status of the housing development project. These significant and definite rights would catalyse the continuity and completion of problematic housing projects that would be rightfully protecting the purchasers' interests, and thus enabling the proprietor to be the "real" white knight of a problematic housing development project. These findings would be significant and applicable to a problematic housing project either that resulted from the COVID-19 affected economic position, or that resulted from other causes. In addition, the findings would cater and initiate the rehabilitation action for problematic housing project during and after this uncertain COVID-19 pandemic situation. These positions would overcome the issue of problematic housing project during the mid- and post- COVID-19 pandemic period.

Hence, this paper recommends that an amendment should be made to the HDA by including an explicit clause that provides and channels the proprietor's statutory action based on the above identified significant rights in giving and deciding the direction of a problematic housing project's completion. For future research, a further study on the effectiveness of the proprietor's involvement in the rescue and completion of a problematic housing project should be conducted.

REFERENCES

- Abdul-Aziz, A. R., & Kassim, P. J. (2011). Objectives, success and failure factors of housing public-private partnerships in Malaysia. *Habitat International*, 35(1), 150-157.
- Abdul-Rahman, H., Alashwal, A. M., & Abdullah, A. A. (2016). Abandoned housing projects in Malaysia: Risk management capabilities during rehabilitation. *ArchNet-IJAR: International Journal of Architectural Research*, 10(2), 153.
- Ariffin, N. M., Razak, D. A., & Intiyaz, M. N. M. (2019). Perception of stakeholders on abandoned housing projects in Malaysia. *International Journal of Islamic Economics and Finance (IJIEF)*, 2(1), 131-148.
- Chai, C. S., Yusof, A. M., & Habil, H. (2015). Delay mitigation in the Malaysian housing industry: A structural equation modelling approach. *Journal of Construction in Developing Countries*, 20(1), 65.
- Creswell, J. W. (2013). *Research Design: Qualitative, Quantitative, and Mixed Methods Approaches* (Fourth Ed.). Los Angeles: SAGE Publications Ltd.
- Dahlan, N. H. M. (2006). *Abandoned housing projects in Malaysia: Its legal causes and legal suggestions*. International Conference in the Built Environment in the 21st Century, 1, 487-511
- Director-General of Health (2020, November 24). *Kenyataan Akhbar KPK 24 November 2020 – Situasi Semasa Jangkitan Penyakit Coronavirus 2019 (COVID-19) di Malaysia*. From the Desk of the Director-General of Health Malaysia. <https://kpkkesihatan.com/2020/11/24/kenyataan-akhbar-kpk-24-november-2020-situasi-semasa-jangkitan-penyakit-coronavirus-2019-covid-19-di-malaysia>
- Director-General of Health (2021, January 29). *Kenyataan Akhbar KPK 29 Januari 2021 – Situasi Semasa Jangkitan Penyakit Coronavirus 2019 (COVID-19) di Malaysia*. From the Desk of the Director-General of Health Malaysia. <https://kpkkesihatan.com/2021/01/29/kenyataan-akhbar-kpk-29-januari-2021-situasi-semasa-jangkitan-penyakit-coronavirus-2019-covid-19-di-malaysia>

⁵ [2016] 7 CLJ 823

⁶ [2012] 1 LNS 1019, and [2010] 6 CLJ 830

- Esa, M. B., Ibrahim, F. S. B., & Kamal, E. B. M. (2020). COVID-19 Pandemic Lockdown: The Consequences towards Project Success in Malaysian Construction Industry. *Advances in Science, Technology and Engineering Systems Journal*, 5(5), 973-983
- Hamzah, A. (2009). *A first look at the Malaysian legal system*. Oxford Fajar.
- Hess, G. F. (2014). Qualitative Research on Legal Education: Studying Outstanding Law Teachers. *Alberta Law Review*, 51, 925.
- Hutchinson, T., & Duncan, N. (2012). Defining and describing what we do: Doctrinal legal research. *Deakin L. Rev.*, 17, 83.
- Kam, K. J., Lim, A. S. H., Al-Obaidi, K. M., & Lim, T. S. (2018). Evaluating housing needs and preferences of generation Y in Malaysia. *Planning Practice & Research*, 33(2), 172-185.
- Kamal, E. M., Hassan, H., & Osmadi, A. (2016). Factors influencing the housing price: developers' perspective. *International Journal of Humanities and Social Sciences*, 10(5), 1676-1682.
- Masram, H., & Misnan, S. H. (2019). Evolution of policy for affordable housing programmes in Malaysia. *International Journal of Accounting, Finance and Business*, 4(17), 86-98.
- Ministry of Housing and Local Government. (2019). *KPKT selected statistics until 30th September 2019*. Retrieved from ehome.kpkt.gov.my
- Ministry of Housing and Local Government. (2020a). *15 projek perumahan swasta terbengkalai dalam kategori proses pemulihan (Sehingga 8 Disember 2020)*. Retrieved from ehome.kpkt.gov.my
- Ministry of Housing and Local Government. (2020b). *27 projek perumahan swasta terbengkalai dalam kategori perancangan pemulihan (Sehingga 8 Disember 2020)*. Retrieved from ehome.kpkt.gov.my
- Ministry of Housing and Local Government. (2020c). *25 projek perumahan swasta terbengkalai dalam kategori projek statik (Sehingga 8 Disember 2020)*. Retrieved from ehome.kpkt.gov.my
- Ministry of Housing and Local Government. (2020d). *Senarai projek-projek perumahan swasta yang sakit sehingga 31 Disember 2020 kategori landed*. Retrieved from ehome.kpkt.gov.my
- Ministry of Housing and Local Government. (2020e). *Senarai projek-projek perumahan swasta yang sakit sehingga 31 Disember 2020 kategori strata landed*. Retrieved from ehome.kpkt.gov.my
- Ministry of Housing and Local Government. (2020f). *Senarai projek-projek perumahan swasta yang sakit sehingga 31 Disember 2020 kategori strata highrise*. Retrieved from ehome.kpkt.gov.my
- Mofijur, M., Fattah, I. R., Alam, M. A., Islam, A. S., Ong, H. C., Rahman, S. A., Najafi G., Ahmed S.F., Uddin M. A., & Mahlia, T. M. I. (2021). Impact of COVID-19 on the social, economic, environmental and energy domains: Lessons learnt from a global pandemic. *Sustainable production and consumption*, 26, 343-359.
- Mohamad, N. N., & Hassan, R. (2020). Understanding Abandoned Housing Projects in Malaysia and the Protection for Home Buyers. *International Journal of Islamic Economics and Finance Research*, 3(2), 77-90.
- Mohammad, N. A. (2008). Analysing the Equitable Spirit of Section 206 of the National Land Code. *Malayan Law Journal*, 3, 44-62.
- Mohd-Rahim, F. A., Zainon, N., Sulaiman, S., Lou, E., & Zulkifli, N. H. (2019). Factors affecting the ownership of low-cost housing for socio-economic development in Malaysia. *Journal of Building Performance*, 10(1), 1-16.
- Phang, S. N., & Tan, T. H. (2016). Challenges of implementing build-then-sell housing delivery system to address the abandoned housing problem in Malaysia. *Malaysian Journal of Economic Studies*, 53(1), 135-151.
- Shah, A. U. M., Safri, S. N. A., Thevadas, R., Noordin, N. K., Abd Rahman, A., Sekawi, Z., Ideris, A. & Sultan, M. T. H. (2020). COVID-19 outbreak in Malaysia: Actions taken by the Malaysian government. *International Journal of Infectious Diseases*, 97, 108-116.
- Sihombing, J. (1992). *National Land Code A Commentary*, 2nd Ed., Kuala Lumpur: Malayan Law Journal.
- Sulong, J., & Taha, M. M. (2016). Implications of multiple land ownership in Malaysia. *International Journal of Social Science and Humanity*, 6(5), 408.
- Tan, T. H. (2011). Sustainability and housing provision in Malaysia. *Journal of Strategic Innovation and Sustainability*, 7(1), 62-71.
- Vohrah, B., & Wu, M. A. (2000). *The commercial law of Malaysia*. Pearson Education Malaysia.
- Wahab, A. (2020). The outbreak of COVID-19 in Malaysia: Pushing migrant workers at the margin. *Social Sciences & Humanities Open*, 2(1), 100073.

LEGISLATIONS (MALAYSIA)

Housing Development (Control and Licensing) Act 1966

National Land Code 1965

Temporary Measures for Reducing the Impact of Coronavirus Disease 2019 (COVID-19) Act 2020

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