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A COMPARATIVE ANALYSIS OF THE LEGAL FRAMEWORKS FOR SIA AND EIA IN MALAYSIA

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Abstract

Environmental Impact Assessment (EIA) and Social Impact Assessment (SIA) are the primary assessment tools used to generate information on the likely impacts of a project on all aspects of the environment and society, aiding the decision-making process to achieve sustainable development. While EIA is mainly concerned with assessing the potential environmental consequences of a proposed development, SIA evaluates the potential social consequences. These two mechanisms play a crucial role in promoting resilient and sustainable development in Malaysia. The legal framework for EIA has been enforced since 1988 and evolved through several legislations, including the Environmental Quality (Amendment) Act 2012 (Act A1441), very much earlier compared to the SIA legal framework, which was introduced in 2017 by virtue of the Town and Country Planning (Amendment) Act 2017 (Act A1522). Thus, this paper aims to analyse the legal framework of both assessment mechanisms, employing the qualitative method of library research, content and comparative analysis. The result shows that the EIA framework is more comprehensive and practical and is an effective model for the improvement of the SIA framework in Malaysia.

Keywords: SIA, EIA, Legal Framework, Malaysia

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INTRODUCTION

The growing global awareness of environmental and social protection and preservation has resulted in an increase in efforts to promote local environmental consciousness (Maisarah et al., 2014). A regulation or law that mandates certain categories of development projects to go through specified evaluations serves as the catalyst for environmental protection in land development projects both, globally and specifically, in Malaysia. The pattern can be observed through the implementation of various assessments designed and aimed at establishing and sustaining resilient development, including Social Impact Assessment (SIA) and Environmental Impact Assessment (EIA). It is to be noted that not all types of development projects are subject to SIA and/ or EIA as the law and policy in Malaysia clearly set down the categories of development projects that are required to undergo these assessments. For instance, in regards to SIA, the Government of Malaysia initiates its implementation by requiring the preparing of reports for massive-scale projects and those having national interest. SIA is currently made mandatory for the aforementioned types of development projects for the reason that SIA is crucial to achieving sustainable development by balancing economic, social, and environmental considerations. SIA is primarily formulated to focus on assessing and evaluating the social consequences and implications of a proposed development project. The assessment procedures are comprehensive in nature as they take into consideration multiple aspects of human life, namely the potential impacts on local communities, individuals, social structures, cultural heritage, and quality of life and all these aspects are technically and thoroughly examined during the decision-making processes (Coakes, 2021; Vanclay, 2003).

On the other hand, EIA is engineered to focus on evaluating the potential environmental ramifications, and effects of the intended project. It assesses variables such as air and water quality, biodiversity, ecosystems, and natural resources (Yusoff, 1996). The predictions that have been made via the evaluation will lead to the implementation of mitigation measures to address the potential adverse environmental impacts of the intended development. As a result, EIA encourages ecologically sustainable development that can strike a balance between human progress and the preservation of the natural environment.

Both, the SIA and the EIA, significantly impact the general public and numerous project stakeholders, including contractors, architects, engineers, planners, consultants, and others. It is imperative that these parties take these assessments seriously and carefully consider the fundamental requirements outlined in the legal framework. Nevertheless, in the course of implementing the existing framework, especially in the case of SIA, it has been found that the legal provisions are inadequate, which necessitates further improvement in its

implementation (Suaree et al.,2022). Thus, this paper aims to dissect and analyse from the comparative perspective, the fundamental background of SIA and EIA, as well as the existing legislation that governs both assessments in Malaysia, such as Act 127, Act A1441, Act 172 and Act A1522, employing qualitative methods such as library research and content analysis. The ultimate aim of this paper is to identify and confirm the status of the earlier findings, including whether or not the problems and difficulties are still present or have largely been solved. Additionally, by employing the comparative method, the researchers believe that recommendations can be formulated in response to the current challenges.

DISCUSSION

SIA Legal Framework

The Town and Country Planning Act 1976 (Act 172) is the principal legislation regulating the planning and development control of land use in Peninsular Malaysia (Act 172, 1976). The Act emphasises the need for comprehensive planning and sustainable development, taking into consideration multiple factors, including social considerations. SIA is an assessment used in the planning process to manage social change resulting from proposed developments in community areas (IISD, 2016). SIA is recognised as a comprehensive framework that encompasses a wide range of impacts ascertainable on humans, such as aesthetic, archaeological, community, cultural, demographic, development, economic, fiscal, gender, health, indigenous rights, infrastructure, institutional, political, poverty, psychological, resource, tourism, and other societal impacts (Syafawaty, 2009).

In 2017, the requirement to conduct SIA for development under SIA Category 1 was inserted vide section 20B (2) of the Town and Country Planning (Amendment) Act 2016 (Act A1522), marking the fifth amendment to Act 172. Tan Sri Noh Omar, the then Minister of Urban Well-being, Housing, and Local Government (2017), stated that the submission of an SIA application is compulsory and is a pre-condition for the approval of certain development projects (The Borneo, 2017). Tan Sri Noh also said that not all development requires the preparation of SIA, but it is subject to the scale of development (Parliament Hansard, 2016). When preparing development plans or considering development proposals, the local planning authority may discretionally take into account the potential social impacts of projects, including effects on communities, socio-economic conditions, cultural heritage, and quality of life. This can be accomplished by integrating SIA principles and methodologies into the planning and decision-making processes. However, Act 172 itself does not explicitly mention the requirement of SIA for SIA Categories 2 and 3 (Section 20B, Act A1522). The Act is also silent on the important features of SIA implementation, such as the criteria for qualified persons to prepare SIA reports,

enforcement, and monitoring in implementing the SIA process. Table 1 shows the Categories of SIA under Act 172, Act A1522 and the SIA Manual.

Table 1: Categories of SIA

Category	Development	Source
One	Coastal reclamation, major infrastructure	Section 20B (2), Act A1522
Two	Township, major infrastructure, hillslopes	Section 22(2A), Act 172
Three	Prescribed in Table 2.3 and determined by State Authority	SIA Manual

Source: Act 172, Act A1522 & Manual SIA

The Town and Country Planning Department at the federal level (PLANMalaysia Federal) has formulated and produced three manuals for project proponents, consultants, and others as a primary reference for SIA implementation. It is essential to refer to these specific guidelines related to SIA for a comprehensive and in-depth understanding of the relationship between SIA and the management of development projects. These manuals act only as a guideline and are not legally binding. The State Authority has the power to implement or not to implement the manual through the State Gazette, and if so, it becomes part of the town and country planning policies for that state. Consequently, the legislation and the court will consider the manual as an authoritative reference in preparing SIA at state level. However, the status of the SIA report will not be automatically void if there is any non-compliance with these manuals. The manual is merely considered a soft law with no sanctions provided for non-compliance.

The first manual is titled '*Pengenalan Ringkas SIA Penilaian Impak Sosial*' (2012), and the second manual is the 'Manual for Social Impact Assessment for Project Development' (Second Edition) (2018). The latest manual, "Panduan Pelaksanaan Penilaian Impak Sosial," which PLANMalaysia released in April 2023, takes into account changes in SIA implementation, including the categorization of development projects, qualifications for qualified individuals, the monitoring and auditing aspect of post-SIA, and others. (PLANMalaysia, 2023). A qualified person is important as that person is reliable and has the responsibility to carry out the report. Prior to this, stakeholders had brought up these concerns regarding the ineffectiveness of the SIA implementation. Although the new manual has been produced, its implementation is still under evaluation since it is still in its infancy and has not been fully implemented across all states.

SIA is essential to assess the potential impact of development projects and help the community realise its right to a high standard of living. The right to access the SIA report is very well illustrated in the case of *Yusof Bin A Bakar and Anor v. Datuk Bandar Kuala Lumpur* (2019); the Court of Appeal in this case allowed the appeal, stating that the public has the right to obtain technical reports such as the development proposal report, traffic impact assessment report, SIA report, and other relevant reports. The respondent had applied for planning permission for development around Taman Tiara Titiwangsa. However, the local community was not given access to the technical reports regarding the planning of that area. The court held in favour of the Appellants, stating that the community has the right to public participation in the process of the development. Public involvement is one of the compulsory processes in preparing the SIA report (Manual, 2018). It is also an established element since Malaysia consented to the Rio Declaration (Loh et. al,2023). This component promotes SIA as a public report that is transparent and accountable. It helps determine the consequences of the proposed development. Therefore, public accessibility to the SIA report is significant to uphold their right to protect the standard of living within that area.

Additionally, the requirement of SIA has been stipulated under two related guidelines: the Guideline of Application for Development Proposal under Act 172 for development projects under section 20B (PPA 14, 2017) and the Guideline of Application for Development Proposal under Act 172 for development projects under section 22(2A) (PPA 13, 2017). These guidelines provide guidance and assistance for relevant stakeholders to obtain advice from the Council on the proposed developments based on the respective categories. However, the content of the manual is more detailed compared to the guidelines (PPA 13 and PPA 14) as the manual outlines the background of SIA, the SIA categories, persons qualified to prepare the SIA report and others. Figure 1 below illustrates the legal framework involved in SIA implementation in Malaysia.

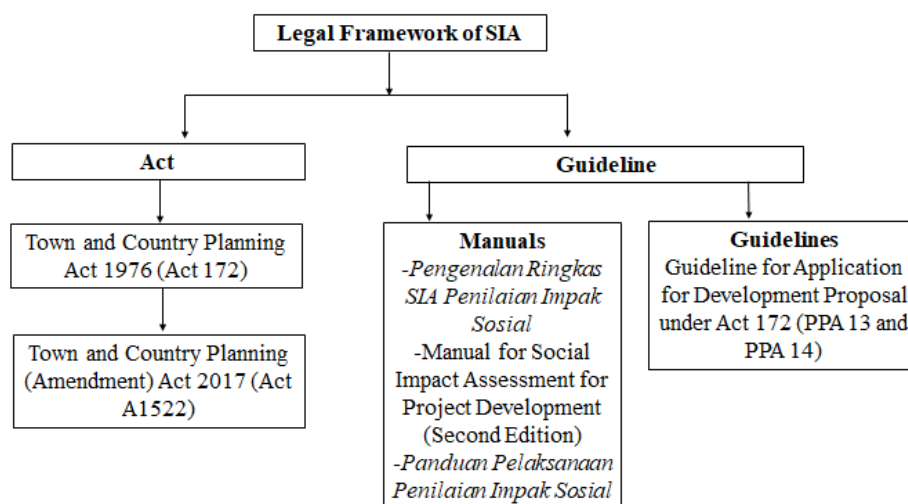


Figure 1: SIA Legal Framework in Malaysia

EIA Legal Framework

The legal framework for Environmental Impact Assessment (EIA) in Malaysia is primarily regulated by the Environmental Quality Act 1974 (Act 127). Section 3 of Act 127 empowers the Department of Environment (DOE) to regulate and enforce environmental quality standards, including the requirements for EIA. This Act is supported by various regulations, rules, orders, guidelines, manuals, and others. In total, twenty-five (25) regulations are enforced to protect the environment (DOE Portal, 2023). For instance, the Environmental Quality (Industrial Effluent) Regulations 2009 provide prescribed limits for pollutants discharged from industrial effluents and require industries to comply with these limits as part of their EIA compliance.

Over time, several orders have been developed in relation to EIA. One such order was the Environmental Quality (Prescribed Activities) (Environmental Impact Assessment) Order 1987, which outlines a list of prescribed activities that require an EIA before they can be carried out. This order prescribed the types of projects or developments that fall under the EIA requirement. However, the Environmental Quality (Prescribed Activities) (Environmental Impact Assessment) Order 1987 has been revoked and replaced by the Environmental Quality (Prescribed Activities) (Environmental Impact Assessment) (Amendment) Order 2015. This amendment expands the scope of prescribed activities that necessitate an EIA, ensuring that a wider range of projects are subject to environmental assessment. Recently, a new proposed amendment has been introduced through the Environmental Quality (Prescribed

Activities) (Environmental Impact Assessment) (Amendment) Order. This proposal further refines the list of prescribed activities and updates the requirements for EIA submissions and assessments (DOE Portal, 2023).

Section 34A (2) of the Environmental Quality (Amendment) Act 2012 (Act A1441) highlights the necessity for individuals undertaking the prescribed activities to appoint a qualified person to conduct an EIA study and submit a corresponding report to the Director General. The DOE is dedicated to enhancing professional knowledge and skills related to EIA through a guideline, namely the Guidance Document on EIA Consultant Registration Scheme. This document provides guidance to help applicants assess their eligibility for successful registration and fulfil the required registration criteria (2019). Section 34A(2B) of Act A1441 states the duties of a qualified person, who should be responsible for preparing the EIA report, recommending a report that does not contain misleading or false statements and being liable for professional indemnity insurance during the EIA process. As a result, it is possible to produce a quality and thorough report to maintain a resilient environment because the requirements outlined in (Act A1441) are sufficiently clear for potential applicants to refer to and follow.

Besides that, the DOE has also issued the Environmental Impact Assessment Guideline in Malaysia, which provides detailed information and procedures for conducting an EIA. Section 34A (2) of Act 127 explicitly states that the EIA report must be in accordance with the guidelines prescribed by the Director General. This guideline serves as a reference for project proponents, consultants, and regulators involved in the EIA process. Figure 2 below illustrates the legal framework for EIA implementation in Malaysia.

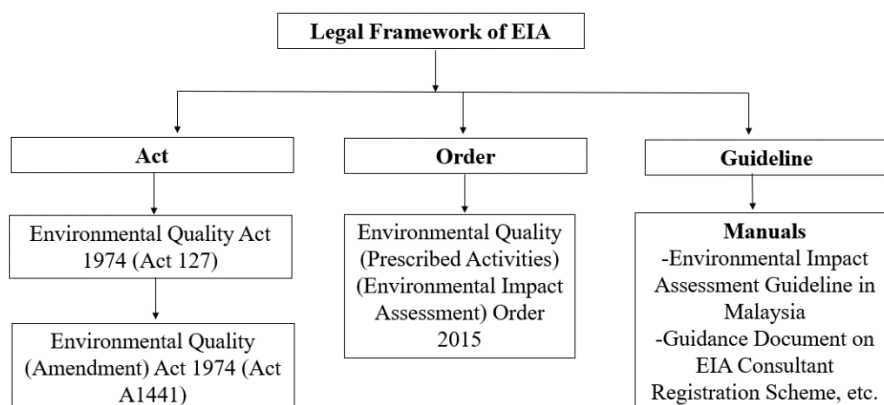


Figure 2: EIA Legal Framework in Malaysia

METHODOLOGY

This research employed a qualitative method, utilising library research, content and comparative analysis. According to George (2008), library research involves collecting, reviewing, and interpreting data from primary sources. Additionally, Zhang and M. Wildemuth (2009) state that content analysis is a research approach used to analyse and interpret textual data, including written documents, interview transcripts, and various forms of communication. The present paper analyses the content of books, articles, related laws, manuals, and reports relevant to the study.

The research also employed comparative analysis in analysing the basic background of SIA and EIA as well as the respective legal framework in conducting the assessments. Norat Roig-Tierno, Tomas F. Gonzalez-Cruz, Jordi Llopis-Martinez (2017) state that this methodology is crucial to establish causal relationships through systematic comparisons. It particularly prescribed the methods of agreement and difference between the two models. The data is presented through a matrix table, providing detailed information on the background of the assessments. This presentation enables a comparison of the similarities and differences between the SIA and EIA legal frameworks.

ANALYSIS AND CONCLUSION

The findings indicate that there are distinctions between SIA and EIA, particularly in regard to their respective scopes and principles. The scope of SIA is to examine the social aspects and impacts associated with a project, including socioeconomic factors, community well-being, cultural heritage, human rights, and stakeholder engagement. It considers, evaluates, and anticipates the project's effects on various social dimensions and aims to identify potential risks and benefits to affected communities and individuals to enable the developer to devise a viable mitigating plan to be put into motion.

On the other hand, although in principle, EIA shares the same spirit as SIA, EIA specializes in the examination of the environmental aspects and impacts associated with a project. It is an assessment tool to evaluate factors such as pollution, habitat destruction, resource depletion, and ecological disruptions. The goal is to identify and mitigate potential adverse environmental effects and promote sustainable development practices. Both assessments are often conducted in conjunction to comprehensively evaluate the potential effects of a proposed development or policy on both social and environmental aspects.

Generally, SIA can be integrated within the EIA framework and process or conducted as a standalone assessment, depending on the legal and policy requirements of a particular jurisdiction in which the proposed development is to be undertaken. Compared to EIA, it often incorporates social considerations to some extent but may not comprehensively address all aspects of social impacts.

Thus, the integration of SIA principles within the EIA mechanism can arguably further enhance the effectiveness of the assessment of social impacts.

In some countries, SIA may have its specific legal framework, while in others, it may be integrated within broader and general environmental or social policies and regulations. In Malaysia, both SIA and EIA are statutorily formulated under their own respective legal framework, as discussed in detail above, thus, the position of both assessments are statutorily recognised and shall be complied with accordingly by the relevant parties. To provide a comparative analysis, Table 2 presents the legal frameworks of SIA and EIA. The table includes the Acts, manuals, and guidelines that have been analysed in this research and contribute to the development of both assessments.

Table 2: Legal framework under SIA and EIA

Legislation	SIA	EIA
Act	Act 172, Act A1522	Act 127, Act A1441
Regulation	NA	Environmental Quality (Industrial Effluent) Regulations 2009
Order	NA	Environmental Quality (Prescribed Activities) (Environmental Impact Assessment) (Amendment) Order 2015, Proposal Amendment of Environmental Quality (Prescribed Activities) (Environmental Impact Assessment) (Amendment) Order
Manual & Guidelines	Manual Preparation SIA for Development Project 2012, 2018, 2023	Environmental Impact Assessment Guideline in Malaysia, Guidance Document on EIA Consultant Registration Scheme

Source: Policies and Frameworks in Malaysia

The law is vital as it serves as a norm of conduct for society and acts as a guide for acceptable behaviour. Many believe that a society without laws would descend into chaos (ENL, 2019). This principle also applies to the legal framework of these assessments. Table 2 shows that the number of legislations pertaining to EIA is greater compared to SIA because EIA implementation was introduced in 1988 as a mandatory requirement through the Environmental Impact Assessment Order (DOE, 1987) for prescribed activities. The implementation of EIA was based on the United States' National Environmental Policy Act (NEPA) of 1969 (2012). On the other hand, the requirement for SIA was only introduced in 2017 under Act 172. The significant gap in the duration

between the introduction of these assessments reflects the difference in the maturity of their implementation. Given the fact that the main intention for the development itself is intended for human beings the introduction of SIA can be viewed as a recognition of the human factor that plays a pivotal role from the development perspective hence, necessitating an evaluation of the impacts of the proposed development on the society.

Table 3 presents a summary of comparison pertaining to the differences of the implementation between these SIA and EIA based on their respective Act (Act 127 and Act 172).

Table 3: Distinctive features of SIA and EIA according to the respective legislations

Element	SIA	EIA	Significance
Requirement of report	Yes, for SIA Category 1 only (Section 20B)	Yes (Section 34A (2))	Ensure the accountability of the project proponent & consultant in preparing the report
Qualified Person	NA	Yes (Section 34A (2))	To ensure quality, only qualified individuals should prepare the report.
Report Approval	NA	Yes (Section 34A (4))	Approval of report by the Director-General/ relevant authority
Public Participation/ Display	NA	Yes (Environmental Quality (Prescribed Activities) (EIA) Order 2015)	Public interest

Source: Policies and Frameworks in Malaysia

Several fundamental aspects of the implementation, such as the requirement for report preparation, the criteria for a qualified person to prepare the report, the significance of approval of the report, the obligation of the applicant to follow prescribed guidelines and others, are required to be considered as stipulated under the Act. The requirement of a report under the Act ensures the accountability of project proponent in preparing the report for a development project. A report that has quality and is transparent will be produced if it is prepared by a qualified person, and such report needs to be approved by the authority to guarantee compliance with the intended environmental goals. Furthermore, during the stage of data collection, it is essential to involve the

surrounding community and potential stakeholders in the preparation of reports, as they are the very group of people that will be directly impacted by the proposed development. EIA has generally addressed these aspects under Act 127 and Act A1441, which assist and facilitate the implementation of EIA among stakeholders.

It has been found that stakeholders face issues with SIA implementation, such as a lack of specific operational provisions under Act 172 and explicit guidelines to further explain the implementation (PLANMalaysia, 2022). The inadequacy of provisions under the Act and guidelines leads to difficulties for them in preparing, monitoring, and auditing the report. Table 3 illustrates that Act 172 does not expressly provide for the fundamental aspects of SIA implementation, for instance, on the aspect of the criteria of qualified persons, report approval mechanism, and mandatory public participation. The table shows that no provision is provided under Act 172 regarding the requirement of SIA for development projects under SIA Categories 2 and 3. The same situation applies to the requirements and criteria of a qualified person, report approval, and public participation. These limitations restrict their ability to contribute effectively to a resilient development environment or in the worst-case scenario, this loophole can be manipulated by any *mala fide* developer maneuvering around technicalities to avoid any liabilities. Furthermore, these limitations can lead to higher costs, especially for consultants and project proponents, who may have doubts about the procedures for preparing SIA reports without a clear basis that they can refer to.

The rapid pace of development has compelled regulators to implement a comprehensive legal framework to strike a balance between social development and the utilization of natural resources. In response to this concern, the government is called upon to make legislative amendments and introduce improvements to the governance of these assessments, with priority to the SIA. Notably, this approach also aligns with the Sustainable Development Goals (SDGs) and will truly promote sustainable development as well as environmental protection in Malaysia.

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