VIOLENCE AGAINST THE WIFE - PROTECTION AVAILABLE UNDER THE DOMESTIC VIOLENCE ACT 1994

Introduction

Violence perpetrated behind closed doors subsists despite the rapid progress in human civilisation. Domestic violence is synonymous with the household, as its victims are usually family members, such as wives, children, incapacitated adults and sometimes even husbands. Every family member in any household is a potential victim of violent acts committed by another member of the family and this phenomenon is not limited to any specific category of people distinguished by ethnic, origin, race or religion.

As domestic violence is committed within the matrimonial home, the victim would rather suffer in silence than reporting it to the authorities concerned. Looking at it the other way round, the victim is usually under threat or undue influence not to report the violence or too embarrassed to do so. As the same is committed within the confines of privacy, society has often chosen not to interfere.

Malaysia is not free from this social problem. Prior to the enforcement of the Domestic Violence Act 1994, domestic violence cases were viewed as family matters and were therefore given less attention. The only civil remedy then available to the victim was preemptive in nature, namely, an injunction. The less attractive alternative that was available was to prosecute the assailant under the Penal Code. Malaysia also has a very unique set of laws relating to matrimonial matters governing Muslims, that is, the syariah law. In the case of Mohamed Habibullah bin Mahmood v Faridah bte Dato Talib,¹ the plaintiff and defendant were husband and wife. The plaintiff alleged that during the course of their marriage, her husband battered her on numerous occasions. The plaintiff subsequently filed a suit in the High

^{&#}x27;[1992] 2 MLJ 793.

Court in Kuala Lumpur against the husband claiming for damages and applying for an injunction to restrain the husband from harassing and molesting her and members of the family. However, since the parties were Muslims and they were subjected to the jurisdiction of the syariah court and the acts committed by the husband were in the nature of a matrimonial offence, Mohamed Azmi SCJ, on behalf of the Supreme Court, said:

the root of her complaint relates to the conduct of Habibullah as a husband during the course of a Muslim marriage. It is not really a civil or criminal matter simpliciter as suggested by the trial judge. In fact and in law, the alleged assault and battery constitute matrimonial offence or misconduct and the matter should be dealt with by the court in its matrimonial and not in its general civil jurisdiction.²

The defendant argued that the plaintiff's action was prohibited by section 9(2) of the Married Women Act 1957 which provides that no husband or wife shall be entitled to sue the other for a tort except for the protection or security of his or her property. Their Lordships inclined towards this argument and held that since the cause of action in this case was clearly a tort and the parties were husband and wife, the court had no jurisdiction to adjudicate on the plaintiff's claim for damages. The Supreme Court seemed to suggest that a distinction must be drawn between an assault and a battery committed by family members and those committed by strangers: the latter is punishable under the Penal Code and the former is not.

Initiated by a group of NGOs and government agencies which teamed up and are known as the Joint Action Group (JAG), the present statute was enacted to fill the lacuna, in particular, provisions for the protection of and remedies for the aggrieved party. Under the statute, section $9(2)^3$ of the Married Woman Act 1957 was amended and a new section $4A^4$ was inserted to facilitate the application of the law.

²Ibid at page 807.

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³S.9(2) provides : Except for protection or security of his or her property, no husband or wife shall be entitled to sue each other for a tort.

⁴S.4A provides : A husband or a wife shall be entitled to sue each other in tort for damages in respect of injuries to his or her person, as the case may be, in the like manner as any other two separate individuals.

Malaysian Domestic Violence Act (MDVA)

With the enactment of the MDVA, violence against family members in the context of matrimonial home is recognised as a social ill which needs to be publicly addressed. The victim, usually the wife, is no longer prohibited from initiating legal proceedings against her abuser husband. The discussion below will emphasise on violent acts committed by abuser husbands against their wives and the criminal and civil redress available for the wives under the MDVA.

Protection Under the MDVA

Part II of the MDVA consists of the types of protection available for abused wives, inter alia, the interim protection order and the protection order.

a) Interim Protection Order

The Interim Protection Order (IPO) is an order sought from the court via an *ex parte* application. The IPO operates as a temporary injunction to restrain the commission of a domestic violence act by the husband or to restrain others being incited into committing domestic violence against the victim.

Section 4(1) and (2) of the MDVA provides as follows:

4(1) The court may, during the pendency of investigations relating to the commission of an offence involving domestic violence, issue an interim protection order prohibiting the person against whom the order is made from using domestic violence against his or her spouse or former spouse or a child or an incapacitated adult or any other member of the family, as the case may be, as specified in the order.

(2) An interim protection order shall cease to have effect upon the completion of the investigation.

Section 12 of the MDVA provides:

12. An interim protection order may be sought pending investigations by the police following an information relating to the commission of an offence involving domestic violence.

Based on the above provisions, the applicant must show to the court two elements, namely, information relating to the commission of an offence involving domestic violence and secondly, that the police are investigating the alleged information. Practical difficulties can arise as the act of domestic violence is not a criminal offence in itself. Any act complained of which comes within the ambit of MDVA must have its corresponding offence, section in the Malaysian Penal Code, before such act is punishable.⁵ The Public Prosecutor needs to issue an Order To Investigate (OTI) if the alleged act amounts to a non-seizable offence. The OTI poses another difficulty as the process of issuing the OTI may prolong the period of waiting for the IPO.

Specific Offence for Domestic Violence

Domestic violence on its own does not constitute a criminal offence unless and until the said violence falls within the ambit of any available section in the Malaysian Penal Code. For instance an assault against the victim may come within the definition of hurt under section 321 of the Malaysian Penal Code.

Section 3 of the MDVA states:

3.The provisions of this Act shall be read together with the provisions of the Penal Code.

Domestic violence according to section 2 of the MDVA means the commission of any of the following acts:

- (a) wilfully or knowingly placing, or attempting to place, the victim in fear of physical injury;
- (b) causing physical injury to the victim by such act which is known or ought to have known would result in physical injury;
- (c) compelling the victim by force or threat to engage in any conduct or act, sexual or otherwise, from which the victim has a right to abstain;
- (d) confining or detaining the victim against the victim's will; or
- (e) causing mischief or destruction or damage to property with intent to cause or knowing that it is likely to cause distress or annoyance to the victim.

³See infra below.

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Section 321 of the Malaysian Penal Code provides:

S. 321 Whoever does any act with the intention of thereby causing hurt to any person, or with the knowledge that he is likely thereby to cause hurt to any person, and does thereby cause hurt to any person, is said 'voluntarily to cause hurt'.

In Chan Ah Moi v Phang Wai Ann,⁶ Justice Abdul Malik Ahmad (as he then was) passed the following remark, albeit, obiter when dealing with the case:

Domestic Violence Act 1994 would be a toothless tiger because in most cases of domestic violence the punching, kicking, assault and etc, they would squarely fall under the category of non seizable offence. There is therefore no immediate need for the police to investigate unless the DPP issues an order to investigate.⁷

Thus, if the assailant commits an act which falls under the category of non-seizable offence, the process of obtaining an IPO will be time consuming with no guarantee that the abuser will not repeat his actions. It is respectfully submitted that the authorities concerned should address this by making domestic violence a criminal offence punishable under the same Act. This is because the nature of the offence and its results are the same whether committed by family members or by strangers.

b) Protection Order (PO)

Section 5 of the MDVA provides:

- 5(1) The court may in proceedings involving a complaint of domestic violence, issue any one or more of the following protection orders:
 - (a) a protection order restraining the person against whom the order is made from using domestic violence against the complainant;

[&]quot;[1995] 3 MLJ 130. "Ibid at page 136.

- (b) a protection order restraining the person against whom the order is made from using domestic violence against the child;
- (c) a protection order restraining the person against whom the order is made from using domestic violence against the incapacitated adult.
- (2) The court in making a protection order under paragraph (1)(a) or (b) or (c) may include a provision that the person against whom the order is made may not incite any person to commit violence against the protected person or persons.

In Malaysia, the PO will be granted during the trial of a criminal offence within the definition of domestic violence. PO may also be granted at any stage of the proceeding if the accused has been released on bail. The purpose of granting the PO at this stage is to protect the victim or complainant from being abused, coached or threatened by the abuser.

Pursuant to the Malaysian Criminal Procedure Code, compoundable offences and bailable offences include but are not limited to the offences of causing hurt and assault.⁸ It would appear therefore that most of the domestic violence cases would fall squarely within the category of compoundable and bailable offences. Thus, protection is much needed by the victims as the abusers might only be compounded or released on bail.

Ancillary Orders

Apart from the IPO and the PO, the court is also empowered to grant the exclusive occupation order, the restraining order, the order to permit usage of vehicle and the order to permit collection of belongings. The power to make these orders can only be exercised if the court is satisfied on the balance of probabilities that it is necessary for the protection and personal safety of the complainant.⁹

Section 6(1) of the MDVA.

⁸For further discussion on compoundable offences see Mimi Kamariah Majid, *Criminal Procedure in Malaysia*, 3rd Edition, The University Malaya Press, Kuala Lumpur, 1999 at page 414-462 and 515-520.

i) Exclusive Occupation Order

The court has the power to make an exclusive occupation order in favour of the victim by excluding the abuser¹⁰ from the house regardless of whether the shared residence is solely owned or leased by the person against whom the order is made or jointly owned or leased by the parties.¹¹ However the provision is subject to an exemption that the court shall not make the order or revoke the order if a suitable alternative residence is found for the victim or when the court is satisfied that the order is no longer necessary for securing the personal safety of the victim.¹²

At the moment, most of the shelter homes are run by nongovernmental organisations. The government supports these organisations by providing grants and other incentives. It is submitted that the government has to provide shelter homes for victims of domestic violence as the number of such victims is increasing.

ii) Restraining Order

The restraining order is an order to restrain the person against whom the order is made from entering the protected person's place, place of employment or school or making any personal contact without the presence of enforcement officers. The court may order that no communication be made either in written form or by telephone with the protected person.

The court also has the power to make an order to permit the usage of a vehicle, which the protected person has previously used and also give any direction as is necessary and incidental for the proper carrying into effect of any order that has been made.¹³

¹⁰Though the exclusive occupation order has been made it will not affect the title or interest of that person.

¹³Section 6(1)(a) MDVA. ¹²Section 6(4) MDVA. ¹³Section 6(1) (f) MDVA.

Power of Arrest

In order to ensure the strict compliance of the IPO and PO, the Magistrate may attach to the aforementioned order the power of arrest if he or she satisfied that the abuser is likely to cause actual physical injury. This power of arrest lies with the police officer who may arrest without a warrant in the event the abuser violates the order or the police officer has reasonable belief that the abuser may violate the aforementioned order.

The purpose of granting the police officer with the power to arrest without a warrant is to enable the arrest to be made without first obtaining the warrant of arrest from the Magistrate. As violent acts such as kicking, assaulting, punching and others are non-seizable offences for which the Magistrate's warrant is needed before an arrest can be made, the power of arrest given here is a useful tool under the circumstances.

Penalties for Non Compliance of the IPO and PO

The abuser who wilfully contravenes the PO shall be guilty of an offence under the MDVA and upon conviction shall be liable to a fine not exceeding RM 2000 or imprisonment not exceeding 6 months or to both. Where the abuser who uses violence against the victim is found guilty of an offence, he shall upon conviction, be liable to a fine not exceeding RM 4000 or imprisonment not exceeding a year or both. Any subsequent conviction for a violation of a PO with violence shall be punishable upon conviction with a mandatory jail sentence of not less than 72 hours and not more than two years and shall be liable to a fine not exceeding RM 5000. Non-compliance of the IPO or PO clearly reflects lack of respect for the law and the court. Thus the Magistrate or the Judge may use his or her power to cite the abuser for contempt of the court order.

The most important part the most important part of the MDVA is the penalties provided for non-compliance of the IPO and PO. As the IPO and PO are the means of protection provided under the MDVA, proper penalties should exist as a deterrence for the abuser to repeat his or her violent act. The prevention of further acts of domestic violence committed after the 'first reported violent act' will enable the victim 28 JMCL

to feel some sense of security. However it is submitted that, the police or the welfare officer should visit the victim who had been granted the IPO to ascertain their safety from time to time. It is also suggested that when the IPO is granted, the person to whom the order is addressed should report to the police station once a day during the period of the IPO.

The duration of investigation in domestic violence cases is less than 4 days. The IPO is valid only during the investigations by the police. By providing for visits by the police officer or welfare officer, the victim would feel safe for the time being or until the tension has eased off.

It is respectfully submitted that statutory provisions which purport to protect domestic violence victims should be preventive in nature rather than curative. They should be proactive rather than reactive.

Remedies Available to Domestic Violence Victims in Malaysia

For purposes of deterrence, pre-emptive remedies per se are inadequate, as in most cases the abuser is prone to repeating the violence. There are other remedial reliefs which can be sought by the victim under the Act. We shall examine the remedies available to the victims.

a) Counselling

Domestic violence is very much related to the mind, character, and psychology of the abuser.¹⁴ Thus, counselling is one of the solutions for self help to alleviate the state of mind and character of the victim and abuser. The court may order the victim and/or the abuser to undergo counselling by referring the parties to a conciliatory body or for psychotherapy. Counselling is useful to encourage reconciliation if the parties are still interested in salvaging their marriage.

¹⁴See discussion in Maria Roy (ed), *Battered Women : Psychosociological Study of Domestic Violence*, Van Nostrand Reinhold Company, New York, 1977 at page 110 - 136.

b) Compensation

Section 10 of the MDVA provides that a domestic violence victim can claim compensation from the abuser.¹⁵ The provision may result in a wife suing her husband for the injuries sustained by her due to the husband's act or a child suing a parent for the injuries suffered as a result of violence inflicted on him or her. In order to pursue this remedy, the victim has to initiate a civil proceeding against the abuser and establish all the elements needed to prove that a tort had been committed and the victim suffered damage as a result of the tort. Compensation as a remedy might work well if the victim and the abuser are perfect strangers but not so if the two are related by matrimony. The more likely situation is for the victim to withdraw the suit against the abuser due to personal reasons such as love and affection, pity, hardship to the other family members and so on. Further, the victim may be aware that the family member concerned has no means to compensate for the injuries sustained.

Compensation for Psychological Abuse

Psychological abuse is the most common abuse in domestic violence. It may be direct or indirect. Psychological abuse covers situations where the victims fear for their own safety or their children's safety. The abuser may wilfully and intentionally abuse the victim mentally or it may happened 'constructively' without the knowledge of the 'abuser'. For example, a husband who deserts his wife for another woman. The wife may suffer a certain degree of injury to her feelings or the agony of being deserted or the children may suffer from being denied their father's love and affection. These injuries may be a ground for the wife or children to claim compensation against the husband or father under the heading of psychological abuse and it is for the court to consider awarding the compensation. The court should be guided by certain established principles and be more cautious in awarding compensation under this heading in order to avoid opening the floodgate of litigation. Unfortunately, the MDVA does not recognize psychological abuse as part of domestic violence.

¹⁵The provision has done away with the old English position adopted in the Married Women Act 1957, which barred spouses suing each other in tort. The Married Women Act 1957 was later amended to accommodate the MDVA.

Suggestions

(a) Procedures for Domestic Violence Cases

The intention of the legislator is to deter any form of violence among family members and to encourage members of the public to come forward and assist those who are in need. The spirit of MDVA to combat domestic violence should not be allowed to diminish simply because of laches, delays and difficulties attached to the rules and procedure of the court of law. For instance, at the moment, the attendance of a welfare officer in court is compulsory for an application for an IPO.

The act of domestic violence need not necessarily lead solely to criminal proceeding. It must be possible for the victim to take a civil action against the abuser based on the circumstances of the victim. The option to resort to criminal or civil proceedings must lie with the victim. The Act needs to serve a dual function as sometimes criminal sanctions are not suitable for the victim and vice versa, for example, when the abuser is the sole breadwinner of the family, or for health reasons or where the children of the family are very young.

In Ngieng Shiat Yen v T'en Jit Hing,¹⁶ the appellant applied for an IPO via an ex parte application to the Magistrate. The appellant in this case married the respondent in 1986 and the respondent started to beat her the following year. Throughout the marriage, the appellant was kicked and beaten up and she sustained injuries. The Magistrate granted an order in terms of the prayer sought by the appellant, that is, the respondent be restrained from using any violence against or making personal contact with her and also granted exclusive occupation of the shared residence. Upon service of the IPO, the respondent applied to set aside the IPO on the ground that a protection order under section 4, 5, or 6 could only be granted pending police investigations. Judicial Commissioner Sulaiman Daud said:¹⁷

With regard to the issuance of an interim protection order I am of the view that s. 4 should be read together with s. 12 where the said s. 4 provides for the powers of the court to issue the interim protection

[&]quot;[2001] 1 CLJ 772.

order while s. 12 provides for the circumstance when such order may be sought. By reading the two sections together, in my opinion, the only construction that can be made is that the court may only issue an interim protection order if there is a pending investigation by the police following an investigation of domestic violence.

His Lordship was also of the same view regarding the protection order under section 5 of the MDVA where the IPO can be granted only in criminal proceeding.¹⁸ In a nutshell, the IPO cannot be obtained through a civil proceeding.

In a normal assault case, the victim has an option either to make a police report with a view to commencing criminal proceedings or suing for damages in a civil court. Domestic violence victims should enjoy the same privilege. The victims should be permitted to take civil action and not to proceed with criminal proceedings. In the case of G = V G,¹⁹ Justice Cartwright was of the view that domestic violence is founded upon the desire on the part of the assailant to exercise power and control in a domestic relationship. It is only fitting that the plaintiff who claims that such violence has been perpetrated on her should have the choice of remedy, provided, of course, it is within the parameters of the law.

The aim of criminal proceedings is different from that in civil proceedings. In criminal proceedings, the Public Prosecutor takes action²⁰ and the aim is to punish the perpetrator. However in civil proceedings the aim is to remedy the plaintiff's status quo. Criminal proceedings should be resorted to only if the relationship between the parties is no longer salvageable but if there is possibility of reconciliation, civil proceedings would be a better option.

¹⁸His Lordship also referred to the definition of 'court' in section 2 of Act 521 and said that proceedings involving allegations of domestic violence is referred to as criminal proceedings. Thus it is consistent with the finding of the court with regard to the issue in question.

¹⁹[1997] NZFLR 49.

²⁰In section 380 of the Malaysian Criminal Procedure Code, the complainant may institute a criminal proceeding against the offender.

(b) The Court Process

The victim of domestic violence who intends to sue the abuser has to file a separate action in the civil court. The jurisdiction of the court will depend on the amount of damages sought. In Kuala Lumpur, a claim below RM 3,000 should be initiated at the Small Claims Court by the plaintiff (victim) himself or herself.²¹ The court atmosphere is not a pleasant environment for litigants who have never set foot in court.

The social stigma also may be a barrier for the victim to pursue any legal action against the abuser because of their relationship. In rural areas or in small towns where everyone knows each other, things may become more complicated. News spreads very quickly and at the end of the day most people in the community will know what has happened to the victim.

If a victim claims for more than RM 5000, he or she may bring the action in the Magistrate's Court. The victim may engage a counsel. This is not a good solution either, as going to court is like entering the Ritz Hotel. Is it worth pursuing legal proceedings when the victim knows very well that the abuser has no means to satisfy the judgement awarded to the victim? Furthermore, where the victim comes from the poorer class of society, he or she does not even possess the financial means to initiate proceedings, much less meet the solicitor's fees.

Secondly, by initiating a civil action, the victim may face the consequences of a broken marriage and sour relationship among the family members as the abuser is now subjected to the due process of law. Furthermore, by washing dirty linen in public during the trial, the victim will be subjected to the trauma of giving evidence as a complainant, leaving her or him with no personal advantage whatsoever except revenge.

(c) Compensation Awarded During Criminal Proceedings

In the event the victim wishes to seek compensation despite the ongoing criminal action, the victim must file his or her claim in the civil court, as the definition section of MDVA has segregated the meaning

²¹Depends on whether the claim is a liquidated or and unliquidated claim.

of a criminal court from that of the civil court. It is very impractical for the victim to do so as the civil litigation process is often time consuming, costly and complicated.

In fact, even in criminal proceedings, the court may order compensation. Under section 426(1) of the Malaysian Criminal Procedure Code, the court may, in its discretion make an order for payment by a person convicted of any crime of a sum to be fixed by the court by way of compensation to any person, or to the representative of any person, injured in respect of his person, character or property by the crime or offence for which the sentence is passed.²² This provision should be applied by the courts in domestic violence cases in appropriate cases.

(d) Punishment for Domestic Violence Offences

The offence and punishment for domestic violence are subject to the provisions in the Penal Code. As far as the Penal Code is concerned there is no discrimination in the type of offence and punishment imposed on the accused, whether the parties are strangers or related to the victim. It is suggested that the punishment for violence involving family members should be harsher as the perpetrator has easy access to the victim and at the same time has breached the responsibility of a parent or a husband or a wife entrusted to take care of their children or wife or husband. An analogy may be drawn from the recent amendments to the Malaysian Penal Code which have introduced incest as a new and separate offence. The amendment introduces severe punishments for incest namely imprisonment of up to 20 years and caning. If the legislators treat incest as a very serious offence, since the offence is committed by family members, fathers or grandfathers or siblings who are entrusted with a duty to take care of their daughters or granddaughters or younger siblings, the same should be the case with domestic violence offenders,

²²See Jal Zabdi bin Mohd Yusoff, Section 10 of the Domestic Violence Act 1994 vs Section 426(1) Criminal Procedure Code, Journal of Malaysian and Comparative Law 2000 at page 305.

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(e) Citizen's Arrest

Domestic violence may be prevented if society plays its role in combating it. Members of the public are reluctant to participate as they do not wish to end up in trouble themselves. Members of the public choose to watch rather than get involved. The public should be encouraged to assist by giving them the power to arrest a.k.a citizen's arrest, in cases involving domestic violence. This would enable the public to be more proactive. Even though domestic violence cases fall within the definition of non-seizable offences for which the public cannot ordinarily make a citizen's arrest, there should be an exception to this general rule as citizen's arrest may come in handy because acts of domestic violence are usually committed behind closed doors.

At the moment, the MDVA has provided that any person who has reason to believe that an offence involving domestic violence is being or has been committed may give information in respect thereof to an enforcement officer. No liability for defamation shall be incurred if the information is given in good faith.²³ This should give incentive to the public to act without fear of being subjected to any legal proceedings.

(f) Interim Occupation Order

It is very difficult for a victim who still lives with the abuser to initiate a criminal or civil proceeding against the abuser as, in most cases, the victims are dependent on the abuser, for example, a homemaker or underaged children or an incapacitated adult. Thus, interim occupation orders will only be effective if the victim and abuser are separated. Each party has ample time to consider the possibilities of action to be taken or possibilities of reconciliation. This is the cooling off period.

If the victim remains in the matrimonial home, the possibility of the victim resorting to criminal or civil proceedings is very minimal. The abuser may walk free and the victim lives in fear as to when the next bout of violence will strike. Justice Majumdar while presenting a paper at the Colloquium on Justice for Women-Empowered Through

²³Section 18 of the MDVA.

Law said that it becomes difficult for the prosecution to prosecute the abuser if the victim remains in the matrimonial home.²⁴

Conclusion

With the MDVA, a wife no longer needs to file a divorce petition in order to seek a protection order. The MDVA is a specific Act passed to overcome a dilemma faced by the victim who still wants to salvage his or her marriage but at the same time needs protection from any form of further abuse from their spouse. Hence, the IPO should be viewed as a cooling off period in the process of salvaging the marriage.

Recognising that domestic violence has very serious implications on the well-being of a family, the government has to make more effort to ensure that domestic violence does not become a cancer to society. The authorities concerned have to work harder to prevent the violence from being committed in the households by taking the necessary preventive measures. Children who frequently witness violence being committed in the household may end up becoming abusers themselves later. We do not want to raise this kind of children in society as then there will be no end to the cycle of violence. The authorities concerned should make the process of obtaining an IPO easier, cheaper and accessible. The failure of the authorities to ensure the safety of inhabitants in a matrimonial home may, it is submitted, amount to an omission to protect the victim's right to a decent life.

Lastly, the act of violence within the household should be condemned as the abuser's action is not only a physical and emotional assault on the victim but also a classic manifestation of the abuser violating the victim's human rights.

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²⁴Domestic Violence and law : report of colloquium on justice for women-empowerment through law, Butterworths India, New Delhi, 2000.

LEGISLATION

The following list of Laws passed in Malaysia is a continuation of the list contained in (2000) 27 JMCL

FEDERAL ACTS

Bil. Akta Act No.	Tajuk Ringkas/Short Title
600	Akta Kewangan 2000 Finance Act 2000
601	Akta Reka Bentuk Susun Atur Litar Bersepadu 2000 Layout-Designs of Integrated Circuits Act 2000
602	Akta Petunjuk Geografi 2000 Geographical Indications Act 2000
603	Akta Penguatkuasaan Konvensyen Periuk Api Pembinasa Anggota 2000 Anti-Personnel Mines Convention Implementation Act 2000
604	Akta Tribunal Perkhidmatan Awam (Pembubaran) 2000 Public Service Tribunal (Dissolution) Act 2000
605	Akta Badan-Badan Berkanun (Tatatertib Dan Surcaj) 2000

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