

## Prejudicial to Public Order: Legal Issues on Banning Book in Malaysia

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### Abstract

In some jurisdictions, a government is allowed to ban any book that is seen as not suitable or improper for the country. Banning books is said to occur if individuals, public officials, or organisations remove books from libraries, school reading lists, or bookstore shelves because they disagree with their content, ideas, or themes. In this context, those who support a ban generally claim that the book in question contains graphic violence, attacks parents and family, is sexually explicit, exalts evil, is unworthy of literary merit, is inappropriate for a certain age range, or uses offensive language. As a result, this article aims to explore the legal implications of banning books in Malaysia. This article uses a qualitative research approach by analysing both primary and secondary data. This article found that under the Printing Presses and Publications Act of 1984, the Malaysian government has prohibited the publication of various books. Section 7 (1) of the Printing Presses and Publications Act 1984 is invoked to ban an undesirable publication in Malaysia. Under these provisions, a book could only be prohibited by order of the minister published in a gazette when the book is "prejudicial to public order." However, this article found that the term "prejudicial to public order" is debatable as it can be interpreted differently. Therefore, this article suggests that the term "prejudicial to public order" under Section 7 (1) of the Printing Presses and Publications Act 1984 must be defined in the statute to prevent misinterpretation of the law.

**Keywords:** *Banning book, prejudicial, public order, undesirable publication.*

## Introduction

Books are an important document to deliver knowledge to the public. Thus, any books containing information that is prejudicial to public order may be banned or prohibited under Section 7(1) of the Printing Presses and Publications Act 1984 (Act 301). The right to ban books is given to the Minister in the Ministry of Home Affairs of Malaysia. The issue in the exercise of the power given to the Minister arises when the said provision uses the phrase “absolute discretion.” It means that the Minister is given total discretion to decide whether a book should be banned or not. Although Section 7(1) specifies that a book may be banned if it is prejudicial or detrimental to public order, the act does not define “public order” or what constitutes “prejudicial to public order.” Hence, a lot of books have been banned by the government of Malaysia. Figure 1 and Table 1 show the books that have been banned by the Malaysian government according to the said law.

Figure 1: Among the Books Banned by the Malaysian Government



Table 1: Among the Books Banned by the Malaysian Government

Name of Publication	Year Published	Type of Publication
The Satanic Verses	1988	Novel
Onward Muslim Soldiers	2003	Non-fiction
Fifty Shades Trilogy	2011-2012	Novel
The Mask of Sanity	2017	Novel
Rebirth: Reformasi, Resistance, and Hope in New Malaysia	2020	Non-fiction
Gay is OK! A Christian Perspective	2013	Non-fiction
Peichi	2020	Novel

The novel “The Satanic Verses” was banned for blasphemy against Islam (Bald, Margaret, 2006). The Satanic Verses is Salman Rushdie’s fourth novel. The novel, published in September 1988, was inspired by the life of the Islamic prophet Muhammad. Rushdie used magical realism and based his characters on contemporary happenings and personalities, as he had done in prior books. The title references the Satanic texts, a collection of Quranic texts regarding three pagan Meccan goddesses: Allāt, Al-Uzza, and Manāt (Erickson, John D., 1998). The section of the story dealing with the “satanic verses” was based on stories from historians al-Waqidi and al-Tabari (Erickson, John D., 1998).

On July 12, 2007, the Malaysian government placed a ban on Spencer’s book “Onward Muslim Soldiers” due to confusion and concern among Muslims (Bernama, 2007). The Internal Security Ministry has banned various books under the Printing Presses and Publications Act 1984, which became effective on May 31. According to Che Din Yusoh, Secretary of the Ministry’s Publication and Quranic Text Control Division, several of the books contained facts that differed from Islamic doctrine, potentially compromising readers’ morals and generating public disorder (Bernama, 2007).

The Fifty Shades Trilogy was banned in Malaysia in 2015 because it contained sadistic content and posed a “threat to morality” (The Malaysian Insider, 2015). According to a statement from the Ministry’s Publication and Quranic Texts Control Division, it had pornographic elements centred on explicit sexual practices but lacked a discernible positive theme. According to Hashimah Nik Jaafar, the division secretary, the prohibition was under Section 7(1) of the Printing Presses and Publications Act 1984.

The Mask of Sanity was preemptively banned in Malaysia due to blasphemy. The book depicts Dr. Jeremy Balint as an up-and-coming cardiologist who discovers that his wife Amanda is having an affair with his colleague Warren Sugarman. The book illustrated that he is also a high-functioning sociopath. Balint plans to murder Sugarman and disguise the crime as the work of a serial murderer (Jacob M. Appel, 2017).

The book “Rebirth: Reformasi, Resistance, and Hope in New Malaysia,” published in 2020, was banned for containing insulting elements to the Malaysian coat of arms that are likely to be prejudicial to public order, security, national interest, alarm public opinion, and violate any law, and thus is “absolutely prohibited throughout Malaysia” (Kit, Chan Wai, 2020).

“Gay is OK! A Christian Perspective” was banned for aiming to promote homosexual culture in Malaysia, which is contrary to the country’s religious and cultural sensitivities (The Star, 2020). The ban was challenged in 2022 by filing a judicial review case with the High Court of Kuala Lumpur. The court lifted the prohibition and ordered Malaysia’s Home Ministry to pay the author RM5,000 (Khairulrijal, Rahmat, 2022).

Further, the book Peichi was prohibited and claimed due to pornographic and immoral content (NST Online, 2020). From the books mentioned above, we can see that a lot of books have been banned. The content of such books is crucial to illustrate the basis of why the authors write them. When emphasizing this, it is important to see that the book is free from prejudicing the public. However, the author of this book has a different view and argument when mentioning it to the media. For instance, Ma Navin explained that the title of his book Peichi revolves around the lives of Tamil people living in the villages of Malaysia (Bharathi SP, 2020). Further, the book, released in 2019, was widely talked about in Tamil Nadu and

Malaysia since it sheds light on the lives of Tamil people living in the Southeast Asian country, their culture, and the work atmosphere in palm tree estates that were created in place of the rubber estates in Malaysia (Bharathi SP, 2020). Based on the books mentioned above, we notice that there is justification for why the books should be banned.

## Methodology

This article adopted a legal research method by utilising a qualitative analysis. It focused on the area of study that discusses legal issues regarding book banning using content analysis. The authors analyse the literature, scrutiny the content of the literature and discuss the findings in this article. Krippendorff asserts that content analysis can take on a variety of shapes, ranging from straightforward word counts to conceptual analysis (Krippendorff, K., 2004). The methods of content analysis and critical analysis were adopted for the analysis of the data collected for this article (Ramalingam Rajamanickam et al., 2015; Ahmad Azam Mohd Shariff et al., 2019; Ramalingam Rajamanickam et al., 2019). Data was collected mainly from primary sources, such as statutes and documents from Malaysia. The collection of data is significant (Ramalingam Rajamanickam et al., 2019) for the research and the reviewing process (Nurul Hidayat Ab Rahman et al., 2023; Nurul Hidayat Ab Rahman et al., 2022; Mohd Zamre Mohd Zahir et al., 2022). When conducting research and producing this article, a qualitative approach was prioritised with a focus on both primary and secondary sources. Based on the analysis, the authors discuss the findings and suggestions in the final part of this article.

## Printing Presses and Publications Act of 1984 (Act 301)

Generally, people advocating a ban complain typically that the book in question contains graphic violence, expresses disrespect for parents and family, is sexually explicit, exalts evil, lacks literary merit, is unsuitable for a particular age group, or includes offensive language. The books can be banned by enforcing the provision as stated in the Printing Presses and Publications Act of 1984. The Printing Presses and Publications Act of 1984, as amended on September 1, 2012, is divided into five parts and two schedules. The five parts are as below:

- Part I: Preliminary
- Part II: Licensing of Printing Presses
- Part III: Permit to Publish Newspaper
- Part IV: Control of Undesirable Publications
- Part V: Miscellaneous

The Printing Presses and Publications Act 1984 was passed to control the use of printing presses and the printing, importation, production, reproduction, publishing, and distribution of publications, and to criminalise publications of materials deemed undesirable. Thus, Section 3(3) of the Printing Presses and Publications Act 1984 empowers the Minister to grant, refuse any application for such licence, revoke, or suspend such licence at any time indefinitely (Fadiah Nadwa Fikri, 2019). Section 3(3) states that:

*The Minister may grant to any person a licence to keep for use or use a printing press and he may refuse any application for such licence or may at any time revoke or suspend such licence for any period he considers desirable.*

Extend to this, Section 7(1) of the Printing Presses and Publications Act 1984 grants the Minister an absolute power to ban any publication that the Minister deems undesirable (Fadiah Nadwa Fikri, 2019). Section 7(1) describes undesirable publications as:

*If the Minister is satisfied that any publication contains any article, caricature, photograph, report, notes, writing, sound, music, statement or any other thing which is in any manner prejudicial to or likely to be prejudicial to public order, morality, security, or which is likely to alarm public opinion, or which is or is likely to be contrary to any law or is otherwise prejudicial to or is likely to be prejudicial to public interest or national interest, he may in his absolute discretion by order published in the Gazette prohibit, either absolutely or subject to such conditions as may be prescribed, the printing, importation, production, reproduction, publishing, sale, issue, circulation, distribution or possession of that publication and future publications of the publisher concerned.*

As regards imported publications, Section 9(1) of the Printing Presses and Publications Act 1984 empowers the Minister to refuse the importation of publication deemed undesirable on the grounds of public order, morality, security, public interest, or national interest (Fadiah Nadwa Fikri, 2019). Section 9(1) reads:

*Without prejudice to anything in this Act, the Minister may refuse the importation into Malaysia or withhold delivery or return to the sender thereof outside Malaysia any publication which he is satisfied contains any article, caricature, photograph, report, notes, writing, sound, music, statement or any other thing which is likely to be prejudicial to public order, morality, security, or which is likely to alarm public opinion, or which is likely to be contrary to any law or is otherwise prejudicial or is likely to be prejudicial to public interest or national interest.*

Therefore, the Printing Presses and Publications Act 1984 is significant to monitor and regulate the printing, importation, production, reproduction, publishing, and distribution of publications in this country. A heated amendment was made after *Operation Lalang*, where all printing presses were required to renew their licence annually through the Ministry of Home Affairs. This is seen as a move to limit freedom of the press. The Act was consequently amended in 2012 to remove the requirement for annual licence application and the government's "absolute discretion" over permits, and reinstated judicial overview (Andrew T. Kenyon, Tim Marjoribanks & Amanda Whiting, 2013).

The Minister is provided "absolute discretion" in the granting and revocation of licences, and can also restrict or ban outright publications that are likely to endanger national security interests or create social unrest. Should one possess or use an unlicensed printing press, the individual may be imprisoned for up to three years and/or fined up to RM20,000. A deposit made under Section 10 of the Printing Presses and Publications Act 1984 will also be forfeited in such a case (Rachagan, S. Sothi, 1993).

Previously in the newspaper, one book publisher, Chong Ton Sin over a controversial book cover on the Internet, has since made an apology (New Straits Times, 2020). The cover of the book indicates a look that bears a striking resemblance to the country's coat-of-arms and portrays a naked child and two tigers with human faces on either side, atop a crocodile. The book entitled, "Rebirth: Reform, Resistance, and Hope in New Malaysia" was edited by

Kean Wong and was published earlier this year with more than 300 copies sold (New Straits Times, 2020).

Further, in *Chong Ton Sin & Ors v Menteri Dalam Negeri & Anor* [2022] 9 CLJ 898, the first applicant is a sole proprietor trading as Gerakbudaya Enterprise who had published the book entitled “Gay is OK! A Christian Perspective” (“the book”) appeared in September 2013. The second applicant is the book’s author. The applicants have filed a judicial review application in response to the first respondent’s decision to impose a ban on the publication of a book published by the first applicant, of which the second applicant is the author. The decision was made under Section 7(1) of the Printing Presses and Publications Act 1984 (Act 301) via Printing Presses and Publications (Control of Undesirable Publications) (No. 3) Order 2020. On November 17, 2020, the first respondent as the Minister of Home Affairs responsible under the Act had ordered that the printing, importation, production, reproduction, publishing, sale, issue, circulation, distribution, or possession of the book be prohibited throughout Malaysia because it is likely to be prejudicial to public order, morality and public interest (“the order”).

The applicants came to know of the ban from online media reports published on December 18, 2020, following a media statement issued by the Chief Secretary of the Ministry of Home Affairs on the same day. The applicants through their solicitor’s letter dated February 2, 2021, requested the first respondent to revoke the order. There was no reply from the first respondent. In essence, the first respondent concluded that the book’s contents as a whole and contextually defend, promote, and encourage homosexuality, which is likely to be detrimental to public order, morality, and public interest. The ban is submitted to be legal and free of illegality, irrationality and unreasonableness. The first respondent maintains that there is no duty on his side to allow the applicants to be heard before imposing of the restriction.

When discussing banning a book, a few aspects need to be taken into concern. Firstly, whether the ban is illegal as the book is a form of expression protected by Article 10(1)(a) of the Federal Constitution. Secondly, whether the book is unlikely to be prejudicial to public order, morality and public interest. Thirdly, whether the ban was a disproportionate fetter to the applicants’ freedom of expression and right to equal treatment. Fourthly, whether the ban is irrational, disproportionate, or excessive. Lastly, there is procedural impropriety as the applicants were not given the right to be heard before the ban which goes against the right to be heard guaranteed under the doctrine of legitimate expectation.

Everyone has the right to freedom of expression. This right shall include freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers. The right to freedom of expression in Malaysia is guaranteed under Article 10 Federal Constitution. The protection of this right is integral not only to Malaysia’s progress as a democratic country but also to the survival and development of every individual citizen (Suhakam, 2022). Although the enjoyment of one’s freedom of expression may be restricted, such restrictions must always be grounded in law, and necessary and proportionately enforced to achieve legitimate aims. Expressions that propagate war and advocate the incitement to national, racial and religious hatred, violence and discrimination must also be prohibited (Suhakam, 2022).

A reasoned decision in a matter where freedom of expression and/or where fundamental liberties are being stifled must be given. Otherwise, it will violate the principles

of procedural fairness guaranteed by Article 8 of the Federal Constitution (*Zi Publications Sdn Bhd v Timbalan Menteri Dalam Negeri & Ors* [2014] 2 MLRH 708).

In the case of *Menteri Dalam Negeri & Anor v Chong Ton Sin & Anor* [2023] CLJU 2609, the Appellants submitted that the Learned Judge's finding that the book was unlikely to be prejudicial to public order was incorrect for these reasons:

- (a) The fact that the book had been in publication for 7 years did not equate to the book having been widely circulated in society. There was no proof of wide circulation.
- (b) The fact of limited, and not wide, circulation was evident from the fact that it was found by the enforcement officer concerned during a random inspection at the bookstore concerned.
- (c) Thus, even though the book had been in publication for 7 years, it had not been widely circulated in society. As such, the Minister was not wrong in holding the opinion that it had the potential to prejudice public order if it were to be widely circulated or if it went viral. It could trigger uproar and even violence among certain sections of our multiracial and multireligious nation.
- (d) There was already evidence of the potentiality of prejudice based on the reaction of some segments of society that held a large-scale assembly protesting against lesbian, gay, bisexual, and transgender (LGBT), and homosexuality, albeit not because of the book. The potentiality of prejudice could, thus, not be eliminated considering prevailing public opinion.

In *Sepakat Efektif Sdn Bhd v Menteri Dalam Negeri & Anor and Another Appeal* [2015] 2 CLJ 328 at page 339, the Court of Appeal remarked that:

“... Where an administrative power is granted as a subjective discretion, courts will subject its exercise to review based on an objective assessment (*Mohamad Ezam Mohd Noor v Ketua Polis Negara & Other Appeals* [2002] 4 CLJ 309; *Minister of Home Affairs, Malaysia v Persatuan Aliran Kesedaran Negara* [1990] 1 CLJ 699; [1990] 1 CLJ (Rep) 186; [1990] 1 MLJ 351; *Darma Suria Risman Saleh v Menteri Dalam Negeri, Malaysia & Ors* [2010] 1 CLJ 300; [2010] 3 MLJ 307). The test is whether a reasonable minister similarly situated would have acted in the same manner. The courts can test the exercise of subjective discretion against objective facts to determine whether the discretion has been fairly and justly exercised ...”.

The right to be heard is guaranteed under the doctrine of legitimate expectation. Until the 1960s, the courts looked for a recognised right in determining the issue of whether an authority was bound to comply with the “audi alteram partem” rule (meaning “listen to the other side” or “let the other side be heard as well”). To benefit from natural justice rules, a complaint of injustice had to prove that the authority in question was interfering with his property, liberty, or livelihood while exercising its powers. Thus, *Cooper v. Wandsworth Board of Works* (1863) 14C.B. (N.S.) 180 held that the exercise of a statutory power to demolish a house in default of written notice of intention to build was qualified by the affected person's right to be heard on the basis that “no man shall be deprived of his property without an opportunity of being heard,...” (1863) 14C.B. (N.S.) 180, 189.

Therefore, from a legal perspective, the term “prejudicial to public order” is so important. Not only that, it is important to protect someone's rights as stated in the Federal

Constitution. Even though the Minister can decide to ban any book, the injured party of the said banned book can bring the case to court to ask for a certain order or prayer.

## Conclusion

Although the author or publisher can seek judicial review from the High Court when his book is banned by the minister, this process is time-consuming and costly. The applicant must go through a legal process to determine if the book should be prohibited or not. In some situations, the matter would not end at the High Court level. If any party is dissatisfied with the High Court's decision, they may appeal to the higher courts, which include the Court of Appeal and the Federal Court.

If the applicable law has specified explicit rules or criteria to be considered for determining whether a book is harmful to public order, there would be no debate over why a book should or should not be prohibited in Malaysia. As a result, the article recommends that adequate rules be added to the Printing Presses and Publications Act of 1984, either by defining the phrase "prejudicial to public order" or by establishing explicit criteria for what constitutes "prejudicial to public order."

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