



Fisheries
Transparency
Initiative

TAKING STOCK

Online Transparency of
Fisheries Management
Information



People's Republic of
Bangladesh

2021 Detailed Assessment Report

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PROBLUE

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We would like to thank all the individuals and institutions who contributed to the various stages of research and preparation of this assessment.

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By making fisheries management more transparent and inclusive, the FiTI promotes informed public debates on fisheries policies and supports the long-term contribution of the sector to national economies and the well-being of citizens and businesses that depend on a healthy marine environment.



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TAKING STOCK: Online Transparency of Fisheries Management Information

assesses the level of information that Bangladesh's national authorities publish on government websites regarding the country's marine fisheries sector.

Bangladesh's 2021 TAKING STOCK: Online Transparency of Fisheries Management Information

assessment consists of this Detailed Assessment Report, as well as a comprehensive Summary Assessment Report. Both reports, as well as information on the methodology, can be found at:

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ABBREVIATIONS

AIS	Automatic Identification System
BBS	Bangladesh Bureau of Statistics
BFIU	Bangladesh Financial Intelligence Unit
BIMRAD	Bangladesh Institute of Maritime Research and Development
BSCMFP	Bangladesh Sustainable Coastal and Marine Fisheries Project
DoF	Department of Fisheries
ECOFISH	Enhanced Coastal Fisheries
FAO	Food and Agriculture Organization of the United Nations
FiTI	Fisheries Transparency Initiative
FMP	Fisheries Management Plan
FRSS	Fisheries Resource Survey System
GoB	Government of Bangladesh
HFMAP	Hilsa Fisheries Management Action Plan
ICT	Information Communication Technology
ILO	International Labour Organisation
IOTC	Indian Ocean Tuna Commission
IUU	Illegal, Unreported and Unregulated fishing
MFSMU	Marine Fisheries Survey Management Unit
MIS	Management Information System
MLPR	Money Laundering Prevention Rules
MMO	Mercantile Marine Office of Bangladesh
MoEFCC	Ministry of Environment, Forests and Climate Change
MoFL	Ministry of Fisheries and Livestock

NPoA	National Plan of Action
ODA	Official Development Assistance
UNEP	United Nations Environment Programme
USAID	United States Agency for International Development
USD	United States Dollar

DIGITAL LANDSCAPE OF BANGLADESH'S MARINE FISHERIES SECTOR ¹

NATIONAL STRATEGIES FOR OPEN GOVERNMENT

Achieving transparency and increasing public access to government information has long been a strategy promoted by the government of Bangladesh. In December 2008, Prime Minister Sheikh Hasina unveiled the [Vision 2021](#), a framework that articulated the country's development goals chosen for 2021, the Golden Jubilee of Bangladesh's independence.

Vision 2021 – some of whose objectives have now been incorporated into the Perspective Plan 2041 – represented an important tool for strengthening government transparency and service delivery in Bangladesh. It was joined by [Digital Bangladesh 2021](#), a programme launched in 2009 which outlined objectives to transform the country's Information, Communication Technology (ICT) infrastructure in order to enhance democracy and bolster economic growth. The path to implement Digital Bangladesh was laid out in the [National ICT Policy of 2009](#), which – relevant for this assessment – targeted improvements in the online availability of and public access to

government information.

The same year also saw the passing of the Right to Information Act (2009), which makes provisions to facilitate citizens' access to government-held information. The Act includes the obligation for public bodies to proactively publish information they produce and ensure its preservation through [catalogues and indexes](#) of information. The Act also established the [Information Commission](#), which has the mandate of adjudicating contested access to information cases and of guiding and overseeing government authorities to ensure they fulfil their duties under the Act.

In 2014, as part of its commitment to implement the National ICT Policy, the government established a [central portal of government information](#). All government Ministries subsequently migrated information from their previous websites to the new centralised portal.

Two years later, in 2016, the government of Bangladesh adopted an [Open Government Data Strategy](#), developed by the Ministry of Planning.

¹ This section is intended to provide a brief introduction to the overarching framework through which the Bangladesh government facilitates public access to information about its marine fisheries sector, and should not be considered an exhaustive source covering every effort, channel and stakeholder contributing to this process.

This strategy reflects international best practices, and includes a commitment to maximise levels of government information freely available in the public domain and to further ensure that such information is published in an accessible, timely and easily re-usable manner.

In 2019, in another effort to realise Digital Bangladesh 2021 the government published the [E-Government Master Plan for Digital Bangladesh](#), produced by the Ministry of Information Communication and Technology.

Improving access to information specific to Bangladesh's fisheries sector is also described as an activity under the ongoing World Bank-financed [Bangladesh Sustainable Coastal and Marine Fisheries Project \(BSCMFP\)](#). This project has a total budget of approximately USD 280 million, and runs for five years, ending in December 2023. The work on strengthening transparency falls under the 'Project Management and Monitoring' component, and specifically targets the implementation of communication plans and activities related to access to information. Additionally, there are further components of the BSCMFP that should improve both the collation of and public access to fisheries data, such as data on the social-economic importance of fisheries for

Bangladesh.

Within this context, the government of Bangladesh has expressed its commitment towards transparency and open government, as communicated through multiple policy documents and pieces of legislation.

However, the following assessment demonstrates that this ambition is yet to yield practical results when it comes to the online availability and structuring of government information on marine fisheries. Indeed, this is immediately evident when consulting the homepage of the [central government portal](#). From this main page, 'Fisheries and Livestock' is listed among the most popular services used by citizens seeking information. However, the underlying link does not redirect users to the Ministry of Fisheries and Livestock's main website. Instead, clicking this link produces a list of several other links, one of them is named 'Fish advise system'. When clicked, this link leads to [an outdated website of the Department of Fisheries](#), which is no longer maintained. *A person using the homepage of the government's central information portal will therefore encounter significant difficulties when attempting to locate the websites which host the majority of fisheries information produced by national authorities in Bangladesh.*

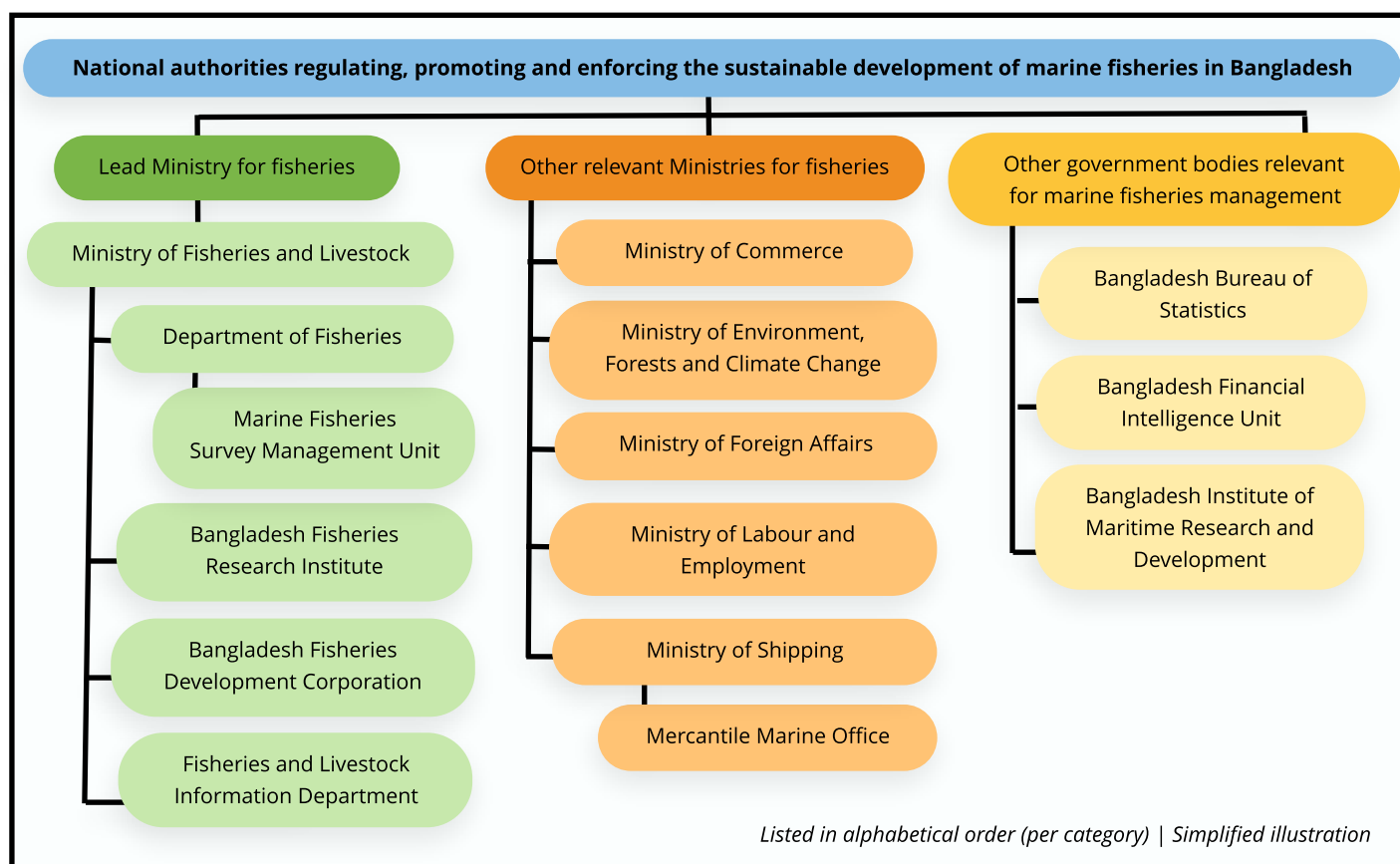
NATIONAL FISHERIES AUTHORITIES

Several [national authorities](#) collaborate to regulate, promote and enforce the sustainable development of the marine fisheries sector of Bangladesh. However, the [Department of](#)

[Fisheries \(DoF\)](#), an agency under the [Ministry of Fisheries and Livestock \(MoFL\)](#), holds the overall responsibility for managing fisheries at the national level.

In addition to the DoF, several Ministries and other government bodies organisations generate information relevant to Bangladesh's

marine fisheries sector. This information, if published online, has been consulted during the preparation of this assessment.



GOVERNMENT WEBSITES AND NOTABLE REPORTS

Within the scope of this assessment, three different entry points were utilised to evaluate whether information on Bangladesh's marine fisheries sector is published online by national authorities:

- By accessing the central government

information portal;

- By directly accessing websites of national authorities, such as the Department of Fisheries;
- By utilising external search engines, such as Google.

WEBSITES OF MINISTRIES RELEVANT FOR BANGLADESH'S MARINE FISHERIES SECTOR	
Ministry of Fisheries and Livestock	https://mofl.gov.bd
Department of Fisheries	http://fisheries.gov.bd

Ministry for the Environment, Forests and Climate Change	https://moef.gov.bd
Ministry of Labour and Employment	https://mole.gov.bd
Ministry of Foreign Affairs	https://mofa.gov.bd
Ministry of Shipping	https://mos.gov.bd

This assessment located a significant amount of information through the above websites. However, the way in which information is organised and presented is often confusing. The homepage of the government's central information portal provides links to the websites of both the Ministry of Fisheries and Livestock (MoFL) and the Department of Fisheries (DoF). *Both organisations have their own websites, with considerable overlap in the information provided between the two. Yet, there are also differences in information found on each website.* For example, both websites contain separate sub-pages of information on laws, rules and policies. The list of laws and policies found on the MoFL page has links to a number of fisheries-related

documents that are not found on the equivalent page of the DoF. It is therefore unclear as to which pages should be considered the primary source of government information.

This assessment also found that the websites of both the MoFL and the DoF contained numerous sub-pages featuring incomplete information and broken links. Certain documents are also published in the wrong place. Specific examples of these issues are provided in this report. Overall, while the authorities responsible for managing fisheries value and utilise their various websites in terms of information sharing, there are significant opportunities for improvements..

A useful online resource for accessing fisheries information comes in the form of the *Management Information System (MIS)* for fisheries. This can be found through the DoF's homepage, under the title of 'List of Registered Fishermen'. Accessing the MIS requires a username and password – although both are presented on its webpage – so it is currently open for anyone to access. Information contained in this MIS includes a database on registered fishers as well as data on total fish catches displayed on a map of Bangladesh. Presently, the information in the MIS seems incomplete and it is therefore assumed that this online system is still under construction. *The MIS has the potential to become an important resource for improving transparency in marine fisheries in Bangladesh. However, it would be unfortunate if this online system, once completed, restricts user access, for example, to authorised government personnel, via a paywall.*



WEBSITES OF SUPPORTING PUBLIC SECTOR INSTITUTIONS RELEVANT FOR BANGLADESH'S MARINE FISHERIES SECTOR

Bangladesh Fisheries Research Institute	http://www.fri.gov.bd
Mercantile Marine Office Department	https://mmd.unlockliveit.com

NOTABLE REPORTS PUBLISHED BY BANGLADESH'S NATIONAL AUTHORITIES RELEVANT FOR ITS MARINE FISHERIES SECTOR

Yearbook of Fisheries Statistics for Bangladesh [latest online version 2018-19]	http://fisheries.portal.gov.bd/sites/default/files/files/fisheries.portal.gov.bd/page/4cfbb3cc_c0c4_4f25_be21_b91f84bdc45c/2020-10-20-11-57-8df0b0e26d7d0134ea2c92ac6129702b.pdf
Annual Report of the Department of Fisheries [latest online version 2018]	http://www.fisheries.gov.bd/sites/default/files/files/fisheries.portal.gov.bd/annual_reports/e0400ef4_6fd3_434b_aa94_0333d5f4c4c8/2020-06-28-13-32-95cad3eec7f0aeb717ae43201c6ea1c9.PDF

This assessment found that the Annual Reports produced by the DoF contain key, detailed information covering many aspects of Bangladesh's marine fisheries sector. *The publication of Annual Reports by the DoF is considered highly positive for achieving transparency.* However, reports are not published regularly or promptly. The latest Annual Report produced by the DoF that is available online is for the year 2018, and this was only uploaded to their website in July 2020.

Similarly, there is often a delay – up to a year – in the publication of the DoF's *Yearbook of*

Fisheries Statistics. Such delays diminish the ability of government information to support sustainable fisheries management.

Furthermore, detailed reports on commercial fisheries in Bangladesh are prepared on an annual basis for the *Indian Ocean Tuna Commission*. However, these reports are only published on the website of the IOTC, and not by the DoF. The value of these reports is also diminished by the fact that their wording has remained identical over several years (the text 'cut and pasted' from the first report).

ADDITIONAL GOVERNMENT OUTREACH AND COMMUNICATION ACTIVITIES

Although this assessment finds that information on fisheries published by the Government of

Bangladesh is limited and often hard to find, it is important to recognise that the government

shares fisheries information in several other ways. The DoF coordinates extensive awareness campaigns among fishing communities on key government policies, including seasonal bans on hilsa fisheries. This includes *Jatka Conservation Week* and the *Fish Week*, which was first launched in 2019. These national events include TV talk shows and trailers, poster/leaflet

distribution, road and boat rallies, awareness meetings, workshops and seminars. The DoF describes these public awareness activities in its Annual Reports. Such efforts are critical in a country with high levels of illiteracy and are therefore unlikely to rely on published government material.

DETAILED ASSESSMENT OF THE ONLINE TRANSPARENCY OF FISHERIES MANAGEMENT INFORMATION IN BANGLADESH

This **TAKING STOCK: Online Transparency of Fisheries Management Information** assessment evaluates and documents whether specific information relating to marine fisheries management is published online by government authorities.² Only information published by government authorities is considered within the scope of this assessment, although information published by third parties is assessed to check whether government information is available at all, is up to date and is a true reflection of current government policies and activities.

This assessment covers 12 thematic areas of fisheries management, as defined by the **FiTI Standard**.³ These 12 thematic areas have been further broken down into a total of 38 transparency elements.

The following Detailed Assessment Report provides explanations for scorings of all

transparency elements.

It should be emphasised that several transparency elements have been assessed as **'Not applicable'**. This is because the transparency element refers to an aspect of fisheries management that is not relevant to the country.

Additionally, some information has been assessed as **'Not produced'**. This refers to information that is not in the public domain because national authorities have yet to collect or compile the relevant data, which may be due to national authorities targeting different priorities or simply do not have the technical, financial or human resources needed to produce such information.⁴

For further information about the methodology behind this assessment, please refer to: <https://www.fiti.global/taking-stock/methodology>.

² Information disclosure through government websites and online publications remains critical in achieving transparency. This ensures information is freely available to anyone (including people outside the country), and that information – including historical data – can be accessed at any time.

³ The FiTI Standard is the only internationally recognised framework that defines what information on fisheries management should be published online by national authorities. The FiTI Standard was developed over two years in a global multi-stakeholder endeavour. Its objective is to contribute to the sustainability of marine fisheries by increasing the accessibility and credibility of national fisheries management information.

⁴ In the spirit of one of its key principles, namely 'progressive improvement', the FiTI does not expect all countries to have complete data for every transparency requirement from the beginning. Instead, public authorities must disclose the information they have, and where important gaps exist, demonstrate improvements over time. As such, engaging with the FiTI is not intended to be a burdensome and costly research activity. The FiTI has been designed to ensure that any country can implement it, including those where resources for collating information are limited. In fact, the FiTI may be particularly beneficial in such contexts, as it should support national authorities in their efforts to organise and present information. As this is the first TAKING STOCK assessment of Bangladesh, transparency requirements for which information is assessed as not yet existent to the government ('Not produced') will therefore not negatively impact the country's overall transparency performance.



1. FISHERIES LAWS, REGULATIONS AND OFFICIAL POLICY DOCUMENTS

A public record of the current laws, regulations and policy documents that relate to the management of marine fisheries is critical for ensuring transparency in the sector. Such documents are often, but not always, published by governments in a national gazette. However, transparency is undermined if it is difficult for citizens to locate these documents, which is the case when they are one of many entries in a more general national registry of official documents. To facilitate public access to laws, regulations and policy documents, the relevant public authority responsible for marine fisheries should list the key documents in one place, also providing summary information and dates of publication.

1-A | LAWS ON MARINE FISHERIES

The general legal framework regulating the fisheries of Bangladesh is provided through the Protection and Conservation of Fish Act of 1950 and the Marine Fisheries Ordinance of 1983. Many Acts relating to fisheries have been passed by the Bangladesh government, and such Acts require further Rules for implementation. For example, the Rules for Marine Fisheries were first established in 1983 and provide specific information on the conditions of licenses and the fees applicable. These Rules have been updated numerous times, resulting in changes to the fee structure of fishing vessels and the introduction of new payments, including the requirement for people working on fishing vessels to apply for a national identify card (introduced in 2000). Fisheries Acts

are also subject to Amendments, with the Protection and Conservation of Fish Act, for example, having been amended three times (in 1995, 2002 and 2014).

One of the most important pieces of legislation for marine fisheries in Bangladesh is the Marine Fisheries Act of 2020. This Act, presented as the Marine Fisheries Bill 2020, was approved by Parliament on November 16, 2020. It is regarded as the most significant legislative change to the management of Marine Fisheries since the Marine Fisheries Ordinance of 1983. According to the most recent implementation report of the World Bank-financed 'Bangladesh Sustainable Coastal and Marine Fisheries Project', the Rules for the implementation of the 2020 Marine

Fisheries Act were drafted in 2019 (when the Bill was being presented to Parliament for approval)

and were due to be released by the MoFL in February 2020.⁵

Basic information requirements:	Available online?	Up to date? (The latest laws are published)	Easy to find?
Registry of national legislation related to the marine fisheries sector ⁶	Yes	Yes	No
	To a full extent	To a full extent	No

Available online?

An intuitive starting point to locate laws and the legislative framework for marine fisheries are the websites of the MoFL and the DoF. The website of the MoFL includes a sub-page for laws and rules related to fisheries, whereas the website of the DoF includes a sub-page for laws, acts and rules. The list of legislation provided on the DoF sub-page includes the name and title of the legislation and its date of publication. The documents containing the various pieces of legislation can either be directly downloaded as a .pdf file, or accessed by clicking a link which leads to another government website. In total, there are almost 30 separate entries in this list, arranged in chronological order based on when the relevant piece of legislation was uploaded to

the DoF website (not in chronological order of the date of the legislation's approval).

However, there are *several deficiencies* in the fisheries laws, acts and rules compiled by the DoF, such as:

- The limited scope of the published laws. The list provided by the DoF does not include important environmental laws which are directly applicable to the sustainable management of marine fisheries. This includes, for example, the Bangladesh Conservation Act (amended in 2010) and the Bangladesh Environmental Court Act of 2010.

⁵ It should be noted that the dates cited in the World Bank report for the release of the Rules relating to the Marine Fisheries Act of 2020 are possibly incorrect. This is because they suggest the rules for the Act were to be published 8 months before the Act was approved by Parliament.

⁶ This assessment does not cover legislations at the sub-national level.

- Links for accessing several pieces of legislation do not function. Such broken links include the link to the 2020 Marine Fisheries Act, which leads to a sub-page that displays the message 'the requested page is not found'.⁷
- The sub-page for 'Rules' (which is provided separately to the sub-page for 'Laws, Acts and Rules'), contains the same list of documents presented on the 'Laws, Acts and Rules' page.

In addition to the information found through the websites of the MoFL and the DoF, legal instruments (including those for fisheries) are

published in the *Bangladesh Extraordinary Gazette*, and can also be accessed through the Laws of Bangladesh website maintained by the *Legislative and Parliamentary Affairs Division*. However, these online sources also have deficiencies, in particular regarding the completeness of the information they publish. For example, the Marine Fisheries Act of 2020 was not located through the Gazette, but was available on the website of the Bangladesh Parliament and Legislative Affairs Division.⁸ A positive feature of this latter website is that the list of laws clearly indicates those that have been repealed.

Up to date?

Overall, given that legal instruments must be published online via the Bangladesh Extraordinary Gazette to enter into force, this

assessment has high confidence that the published national laws relating to the country's marine fisheries sector are up to date.

Easy to find?

Without a clear entry point to retrieve such information as well as the lack of a thematic annotated catalogue of fisheries-related national regulations, understanding which laws currently govern Bangladesh's marine fisheries sector is extremely difficult for the layperson. Information on laws can be found on the MoFL

and DoF websites, but both duplicate information, lack certain information (e.g. the Marine Fisheries Act of 2020 could not be found on the website of the DoF), or include broken web links. This indicates that these websites are currently poorly maintained. Therefore, this assessment considers legal documents on

⁷ However, the list of laws and rules provided on the website of the MoFL does include a working link to the Marine Fisheries Act.

⁸ The Marine Fisheries Act can be found by using the search function and typing 'Marine Fisheries'.

marine fisheries to be difficult to find.

Furthermore, given the fact that the list of laws, acts and rules provided by the DoF is presented without any explanatory text, finding the most relevant text is cumbersome for a layperson.

This is due to the fact that without reading all the texts, it is not possible to understand which pieces of legislation are active, and which ones have either been amended or repealed by others.

1-B | FISHERIES POLICY DOCUMENTS ⁹

Numerous policies are produced that influence the management of fisheries in Bangladesh. An effort has been made by the DoF to describe policies in a paragraph on its sub-page '[About the Department of Fisheries](#)'. However, this description is brief and generally refers to a national fisheries policy being developed without specifying what this policy is.

A description of government policies can be

found in a dedicated chapter of the Annual Report of the DoF. The 2018 report explained that the strategic objectives of the government follow those established in the [National Fisheries Policy of 1998](#). Furthermore, it was explained that the DoF had agreed to measurable targets for fisheries under both the Bangladesh Vision 2021 and the National Five Year Plan (7th version).

Basic information requirements:	Available online?	Up to date? (The latest official policy documents are published)	Easy to find?
Comprehensive list of national policy documents	Partially	No	No
	To a limited extent	No	No

⁹ Fisheries policy documents are defined in the broadest sense as the accumulation of documents and instruments regulating the sector. A policy document includes a national strategy for fisheries development. These may be produced as standalone documents exclusively for fisheries, or fisheries may be included as one sector of a broader policy, e.g. on the marine environment, agriculture and trade etc. Governments may produce multiple policy documents on fisheries development targeting different sub-sectors or thematic areas. For this assessment, policy documents are distinguished from fisheries management plans, which are time-bound strategies relating to the management of a specific fishery. These are assessed separately.

While the government of Bangladesh does publish policy documents related to marine fisheries – through both the websites of the MoFL and the DoF – this *information is incomplete*.

The website of the DoF includes a dedicated sub-page for fisheries policy documents. As with the sub-page for 'Laws, Acts and Rules' (see above), this sub-page is arranged in a table with policy documents listed in chronological order based on their date of upload to the website. The list provides the title of the fisheries policy with a link to a downloadable .pdf document.

However, when reviewing the text of the DoF's Annual Reports as well as publications from other sources, it appears that several important policy documents produced by the government of Bangladesh are not published online. For instance:

- The 2018 Annual Report explains that the National Fisheries Policy of 1998 had been revised and was now superseded by the National Fisheries Policy of 2018. However, the *National Fisheries Policy of 2018* is not published on the DoF website. Furthermore, in recent Annual Reports of the DoF it is described that the National Fisheries Policy of 1998 was superseded by the *National Fisheries Policy of 2006*. This policy can only be found via external search engines (e.g. Google), which retrieves the original document from the DoF website. However, this policy does not

appear on the list of documents presented on the DoF's sub-page named 'Policy'. The document is therefore published by the DoF, but with no direct link to access it online.

- The government has recently launched a programme for the development of industrial tuna fisheries, referred to as '*Exploring Tuna and Pelagic Fishes from the Deep Sea in the Bay of Bengal*'. However, it was not possible to locate any documents on the DoF website on this strategy.
- Research for this assessment was also interested in finding documents relating to international fisheries policies. An important achievement for the government of Bangladesh was the *Strategic Action Plan of the Bay of Bengal Large Marine Ecosystem*. This was signed by the Minister of the MoFL and the then-Minister of the Environment and Forests in 2015. However this document is not found on the DoF website, nor on any other government website.
- The DoF has acknowledged that it has been preparing a *National Plan of Action (NPOA) for Sharks* since it became a member of the IOTC in 2015. The last *national report to the IOTC* by the Bangladesh government in 2020 confirms that the DoF has been engaging with other members of the Bay of Bengal Large Marine Ecosystem to establish this National Plan, with the document in draft form for consultation.

However, no information is published online. It should be noted that the DoF – in its report to the IOTC submitted in 2018 – stated a draft NPoA for Sharks had been completed for consultation. The same information was presented in both its 2016 and 2017 reports. Bangladesh's IOTC reports submitted over several years are word-for-word identical, with only amendments made to statistical reporting on catches and number of vessels.

- The DoF has also stated on certain occasions that it has developed a *National Plan of Action to Eliminate Illegal, Unregulated and Unreported Fishing*. This was referred to in the DoF's 2015 Annual Report and also mentioned in its 2018 Annual Report. However, this plan was not found on the DoF website. It was found on the website of the MoFL, as one of the documents presented as part of the lists of laws and rules. It is unclear why this document is published by the MoFL but not included in the information published by the DoF. It is also not a piece of legislation, so it should be listed under

policy documents by the MoFL.

This assessment positively notes that the DoF publishes measurable targets for fisheries outlined in both the Bangladesh Vision 2021 and the National Five Year Plan (7th version) as part of its Annual Reports. Publishing these strategic objectives and measurable targets is a positive step towards achieving transparency, and clearly communicates the priorities of the government.

Finally, it is important to recognise that marine fisheries are also influenced by policies developed by other Ministries. For example, marine fish and ocean biodiversity is a component of the *National Biodiversity Strategy and Action Plan for Bangladesh (2016-2021)*, which was developed by the (then-named) Ministry of Environment and Forests as the lead Ministry, in collaboration with others, including the MoFL. However, the strategy cannot be found on the DoF website, and is also not published online by the Ministry of Environment, Forests and Climate Change (MoEFCC).¹⁰ This policy document can only be found on the website of the Convention on Biological Diversity.

Up to date?

The list of policy documents presented by the DoF is considered outdated, as for example

several superseding policy documents are not published at all.

¹⁰ A review of the list of policy documents hosted on the MoEFCC website suggests that the information there is also incomplete, and that the website is not maintained. The only Annual Report published by the MoEFCC dates back to 2012.

Policy documents related to Bangladesh's marine fisheries are difficult to find. The incomplete list provided by the DoF requires the consultation of other online reports and use of external search engines (e.g. Google) to gain a more complete picture and locate important documents.

Also, without any explanatory text introducing this list of policy documents, it is impossible to understand how the documents relate to each other.

Furthermore, the confusing architecture of the DoF website inhibits easy access to policy documents. In addition to the dedicated sub-page for policies, the DoF also provides a separate sub-page for 'Plans'. This sub-page contains 35 documents, many of which appear to be important fisheries policy documents yet

are not found on the sub-page for fisheries policies. These include the DoF policies relating to the national Blue Economy Strategy, Bangladesh Vision 2021, and the role of fisheries in Bangladesh in meeting the Sustainable Development Goals. Moreover, the list of plans includes documents that appear to be included by mistake. This includes the 1983 Marine Fisheries Ordinance, as well as a briefing report published by the United States Agency for International Development (USAID) in 2018 on nutrition and food security in Bangladesh (which is not specific to fisheries). The terminology used by the DoF for organising documents into separate sub-pages is therefore not used consistently and many documents are randomly included in lists.

1-C | FISHERIES MANAGEMENT PLANS ¹¹

Until recently, the government of Bangladesh has not used the terminology of a Fisheries Management Plan (FMP) to refer to strategies aimed at managing specific fisheries over a designated timeframe. Instead, national strategies were developed for specific fisheries. The most important achievement in this regard was the *Hilsa Fisheries Management Action Plan*

(HFMAP) – finalised in 2003 – which is widely credited for reviving the populations of hilsa, the national fish of the country. The HFMAP was a long-term plan running up to 2015. It was later reviewed and further developed through a joint project between the DoF, the International Institute for Environment and Development, and subsequently the Enhanced Coastal

¹¹ Fisheries management plans are usually produced in consultation with fishers and other stakeholders, setting targets and procedures for the management of the fishery over a designated time frame.

Fisheries in Bangladesh Programme (ECOFISH-Bangladesh). It is jointly implemented by the DoF, the WorldFish Centre and the FAO. In 2014, the government also finalised a *National Shrimp Policy*.

More recently, the DoF has developed two FMPs:

- the FMP for *Artisanal Fisheries of the Cox's Bazar District*; and
- the FMP for the *Industrial Fisheries in Bangladesh*.

These were undertaken through a project financed and supported by the FAO, entitled

'Technical Support for stock assessments for marine fisheries in Bangladesh', which ran from 2016 to 2020. The FMP for the Industrial Fisheries is also a project activity funded by the World Bank's 'Sustainable Coastal and Marine Fisheries Project'. The most recent status and implementation report issued by the World Bank notes that: 'A Fisheries Management Plan incorporating the Precautionary Principle has been prepared and, following on an extension of its stakeholder consultation process, will be taken up for MoFL clearance and DoF adoption in February 2021.'

Basic information requirements:	Available online?	Up to date? (The latest fisheries management plans are published)	Easy to find?
Comprehensive list of fisheries management plans	Partially	Partially	No
	To a limited extent	To a limited extent	No

Available online?

Bangladesh does *not provide a comprehensive list of FMPs*, but some relevant documents are published on the sub-page 'Laws, Acts and Rules' on the DoF website (see above).

There is no dedicated sub-page within the DoF website that provides information on management plans for specific fisheries. The National Shrimp Policy is published as a .pdf document on the DoF website (under 'Policies'), but the information on the HFMAP cannot be located, as well as information on how this plan

has evolved. The original HFMAP document is not published and cannot be retrieved from any other website.

The more recent FMP for the Artisanal Fisheries of the Cox's Bazar District is not published by the DoF, nor can it be found on any other website. It is possible that this FMP remains in draft form and is not under implementation, although the FAO reports that several stakeholder meetings have been held regarding this plan's development.

Up to date?

It is unclear whether all of the published FMPs are up to date, also due to the fact that several

documents could only be located in their draft forms.

Easy to find?

The FMP for the Industrial Fisheries in Bangladesh is not easily found on the DoF website. However, the [draft document](#) was located through an external search. This revealed a dedicated, standalone sub-page provided by the DoF dedicated to the World Bank-financed 'Sustainable Coastal and Marine Fisheries Project', including a link to this plan. This website is not clearly linked from the homepage of the DoF and is therefore likely to be missed by anyone using the DoF website as a

starting point to locate such information. Having a separate website for the World Bank project is confusing and likely counterproductive for facilitating public access to information (see section 11-A for further information).

Furthermore, other stakeholders less familiar with the sector – such as the media or parliamentarians – might not even be aware of the existence of such plans, and therefore not utilise external search engines.



2. FISHERIES TENURE ARRANGEMENTS

Fisheries tenure arrangements define how fishing rights are accessed, used, and managed. Tenure in fisheries covers a wide range of scenarios. Fishing rights can be provided on an individual basis (such as through restricted short-term licensing systems), or they can be designated to entire groups (such as when exclusive long-term access to areas of the sea is provided to coastal fishing communities). Official rules on tenure are one of the most critical aspects of sustainable fisheries management because they influence the sector's social, ecological and economic impacts. However, the effectiveness of fisheries tenure arrangements can be undermined by a lack of openness and publicity regarding government rules and procedures. As a result, citizens can suffer from limited insights into how tenures work, who owns fishing rights, and how the benefits and costs of fishing activities are distributed.

Bangladesh's Marine Fisheries Act of 2020 covers many aspects of fisheries tenure considered for this assessment. The Act describes how all fishing vessels require a license or permit to fish and it sets out the necessary procedures for issuing such authorisations, as well as prohibited activities, including applicable sanctions. However, the Marine Fisheries Act does not cover all relevant issues related to tenure arrangements, some of which can only be found in other government documents and legislation. There are other aspects of fisheries tenure that are somewhat ambiguous, as outlined below.

To understand how transparency of government information on tenure has been assessed in this report, some contextual information is required. This also draws attention to where rules on tenure are potentially ambiguous, and therefore important for government information to clarify:

■ Definition of categories of fishing:

Fisheries tenure in Bangladesh distinguishes *between marine fisheries and freshwater fisheries* (as well as fish farming). This distinction is important as specific laws apply to marine fisheries, but not to freshwater fisheries. However, the boundaries between ocean and freshwater bodies of waters (i.e. rivers) are not explicit. Legal and policy documents influencing fisheries tenure in Bangladesh do not provide maps that clearly delineate boundaries between marine fisheries and freshwater fisheries. This is particularly relevant for the large number of coastal people engaged in fishing, many of whom fish in both freshwater and the sea for several fish species that are commercially important, including hilsa. Whether a lack of clarity between marine and freshwater fisheries causes significant problems in the

country remains undocumented, such as during applications for permits and licenses.

In addition to the distinction between marine and freshwater, Bangladesh's fisheries management is based on a *distinction between categories of fishing vessels*. In many reports issued by the government, a distinction is made between industrial fishing vessels, mechanised vessels and non-mechanised vessels. It is difficult to locate the relevant laws which distinguish between these categories. They are not referred to in the Marine Fisheries Ordinance of 1983, nor the corresponding rules, but are rather established in general terms through other government documents, including the Marine Fisheries Sub-Sector Strategy of 2006. According to this document, the distinction between these sub-sector categories is largely based on the size of the vessel, the characteristics of the boat and the number of days that the vessels stay at sea to catch fish. However, these distinctions are fairly vague, and in reality a decision on whether a vessel is classed in the non-mechanised sector as opposed to the mechanised sector may therefore be arbitrary.

Confusingly, the Marine Fisheries Act of 2020 (chapter 1) describes artisanal vessels as any fishing vessel that is not engine powered. However, other DoF reports subdivide the artisanal sector into the mechanised sector and the non-mechanised sector, with

'mechanisation' understood to include vessels that use engines.

A definition of the industrial fishery is not provided in the draft FMP for Industrial Fisheries, suggesting that although the de jure definition may be difficult to locate, the de facto distinction between the artisanal and industrial sector is not a matter that generates disagreement. This distinction is important, as industrial fishing vessels are prohibited from operating in the coastal waters of the sea at depths of water less than 40 metres. *Bangladesh therefore provides an exclusive fishing zone for small-scale fisheries.*

- **Conditions relating to fishing effort:** The Marine Fisheries Act establishes that the government may revoke or refuse fishing authorisations if this is deemed necessary for the management and conservation of fisheries (chapter 4). Additionally, it states that the government can limit the number of fishing licenses (chapter 2, section 4). However, it is unclear if the government indeed does this for any sector, including the industrial sector. Fisheries therefore largely conforms to what is known as '*open access*'. Important strategies to limit fishing intensity across all sectors in Bangladesh comes via periodic closures of fisheries and the use of marine protected areas (specific fishing methods are also banned, as described in the Marine Fisheries Act of 2020).

The FMP for the Industrial Fisheries in Bangladesh alludes to a system of reducing

numbers of fishing vessels over time, but the details of this system (such as specific targets) are not mentioned. It is ambiguous whether this strategy is operational – and this assessment assumes it is not. For this reason, the assessment considers information on rules for limiting fishing intensity to be publicly available, although it is a decision made with some reservation.

- **Customary tenure:** Although customary systems of fisheries governance at the local level are thought to have existed in Bangladesh, the national government has not formally recognised these. Through projects supported by international development partners, Bangladesh has promoted forms of community co-management of marine fisheries. An important achievement in terms of expanding community co-management was established through the ECOFISH Phase I project, which resulted in the formation of community co-management groups in 136 villages and 63 landing sites around Bangladesh. However, locating documentation on these initiatives in government reports is difficult, and it is unclear as to the extent that these initiatives have led to a formal transfer of decision-making responsibilities at the local level. There is very limited information available in government reports on the extent and nature of decentralisation in government management or the transfer

of fisheries management functions to non-government organisations, and it would seem that Bangladesh remains largely based on a centralised system of fisheries governance.

- **Oversight and participation:** No provisions can be found in existing marine fisheries laws or regulations that demonstrate any formal mechanisms allowing external oversight of fisheries tenure decisions. In general, legislative changes to fisheries require Parliament approval, but this assessment found no information on any formal obligations for oversight and consultation with other government organisations. This includes, for example, decisions regarding issuing fishing authorisations.

Participation of the fishing industry or civil society in any decision that impacts tenure is not formalised. The Marine Fisheries Act does not at any point refer to a government obligation to consult or seek the views of non-government actors in tenure decisions. It is clear that the Bangladesh authorities do undertake public consultation activities, but these seem to be in an informal and ad hoc manner. This aspect has been highlighted in Bangladesh, and national authorities have committed to establishing a *Citizen's Engagement Forum (CEF)* as part of the 'Sustainable Coastal and Marine Fisheries Project', financed by the World Bank. However, due to the COVID-19 pandemic, this activity has stalled, as public gatherings were

restricted (so far, at least one CEF was held in Chattogram in 2020). This assessment therefore considers public information on

oversight and public participation to be ‘not produced’, as no evidence was found that the government has actually devised such rules.

2-A | COMMERCIAL FISHERIES (LARGE-SCALE AND SMALL-SCALE)

Under the FiTI Standard, commercial fishing is categorised either as large-scale or small-scale fishing. These two sectors are very different in the scale of operation, employment generation,

and degree of capital intensity and investment. In the absence of a universal definition for these sectors, boundaries where one ends and the other begins can often be unclear.

Basic information requirements:	Available online?	Up to date? <i>(The latest tenure rules and procedures are published)</i>	Easy to find?
Fees of access rights and fishing authorisations	Yes	Yes	No
Duration of such rights and authorisations	Yes	Yes	No
Transferability of such rights and authorisations	Yes	Yes	No
Divisibility of such rights and authorisations	Yes	Yes	No
Authorities/persons that are legally entitled to issue such rights and authorisations	Yes	Yes	No
Mandatory administrative procedures required to determine their issue	Yes	Yes	No
Conditions relating to fishing effort	Yes	Yes	No
Conditions relating to ecosystem impact	Yes	Yes	No
Conditions relating to landings	No		
Conditions relating to transshipping	No		
Conditions relating to catch reporting	No		
Procedures and rules for authorising a Bangladesh-flagged vessel to fish in a third country or on the High Seas	Not applicable		

Provisions for formal mechanisms of external oversight and public consultations of fisheries tenure decisions	Not produced		
	To a large extent	To a full extent	No

Available online?

The assessment was able to locate government information on most of the rules and procedures for fisheries tenure for commercial fisheries, including those that are applicable for industrial fishing and small-scale fishing. This information is documented in national legislation and FMPs. However, there were some aspects where government information was not

found. This relates to rules on landings, transshipping and catch reporting.

As there is no evidence that Bangladesh fishing vessels operate in a third country or on the high seas, this element was considered as not applicable.

Up to date?

As tenure arrangements are generally defined under legal regulations in Bangladesh (e.g. the Marine Fisheries Act of 2020) – and such regulations need to be officially published in order to enter into force – it is assumed that the published information on tenure arrangements is up to date.

However, this may not be the case with fees payable for access rights and fishing authorisations for commercial fisheries. For example, a fee schedule was provided in

previous Marine Fisheries Rules. However, the Rules of the Marine Fisheries Act of 2020, which would typically contain such information, were not found during this assessment, as they are awaiting approval.

It has been assumed that the most recent published information on the fee structure applied for industrial fishing is being used by the national authorities, although there is some uncertainty over this issue.

Easy to find?

As already stated, Bangladesh's Marine Fisheries

Act of 2020 covers many aspects of fisheries

tenure considered as part of this assessment. Yet, this Act and the FMPs are difficult to find.

While many details of commercial fisheries tenure in Bangladesh can be understood by examining legal documents and reports published on government websites, information is scattered. Also, these legal documents are often not written for the layperson and no

succinct summaries of their contents are provided. Gaining an understanding of how commercial fisheries are regulated in Bangladesh can therefore quickly become a cumbersome process, as it requires consulting sources of information relating to specific fisheries.

2-B | COASTAL SUBSISTENCE FISHING

Basic information requirements:	Available online?	Up to date? <i>(The latest tenure rules and procedures are published)</i>	Easy to find?
Fees of access rights and fishing authorisations	Not applicable		
Duration of such rights and authorisations	Not applicable		
Authorities/persons that are legally entitled to issue such rights and authorisations	Not applicable		
Mandatory administrative procedures required to determine their issue	Not applicable		
Conditions relating to fishing effort	Not applicable		
Conditions relating to ecosystem impact	Not applicable		
Conditions relating to landings (including the sale of fish)	Not applicable		
Conditions relating to catch reporting	Not applicable		
Provisions for formal mechanisms of external oversight and public consultations of fisheries tenure decisions	Not applicable		
Not applicable			

Available online?

No distinction is provided in Bangladesh fisheries laws between commercial artisanal fishing and subsistence fishing (i.e. fishing for personal consumption only). Similarly, government fisheries information on marine fisheries, as for example presented in the DoF's Yearbook of Fisheries Statistics, does not distinguish between commercial artisanal fishing and subsistence fishing.

However, in relation to inland fisheries, government statistics do cover subsistence fishing as a standalone category. Although it is

recognised that many people in Bangladesh engage in subsistence fishing from marine and coastal areas – including fishing from vessels, fishing from the shore or gleaning (collecting fish and shellfish) – there does not appear to be any explicit rules regulating or limiting these activities.

Accordingly, transparency regarding tenure arrangements for coastal subsistence fishing is considered as not applicable for this assessment.

2-C | SCIENTIFIC AND EXPLORATORY FISHING

Basic information requirements:	Available online?	Up to date? <i>(The latest tenure rules and procedures are published)</i>	Easy to find?
Fees of access rights and fishing authorisations	No		
Duration of such rights and authorisations	No		
Authorities/persons that are legally entitled to issue such rights and authorisations	Partially	Yes	No
Mandatory administrative procedures required to determine their issue	Partially	Yes	No
Conditions relating to fishing effort	No		
Conditions relating to ecosystem impact	No		
Conditions relating to landings (including the sale of fish)	No		

Conditions relating to catch reporting	Yes	Yes	No
Provisions for formal mechanisms of external oversight and public consultations of fisheries tenure decisions	Not produced		
	To a limited extent	To a full extent	No

Available online?

There is a scarcity of information in the public domain on the extent of scientific and exploratory fishing in Bangladesh. However, the draft FMP for the Industrial Fisheries notes that 2020 saw 39 licenses issued for what is called a 'trial trip'. There is no further information provided on whether these licenses are issued for the purpose of scientific or exploratory fishing. The quantities of permissible catches and the number of days fishing under these licenses is also not detailed. However, scientific and exploratory fishing can account for a significant proportion of fishing in the sector, and therefore transparency is an important component for sustainably managing this activity.

Procedures for the management of scientific and exploratory fishing are addressed in the Marine Fisheries Act of 2020 (chapter 7, section 31). The Marine Fisheries Act does not, however, provide any insight into the rules and regulations around a number of areas covered in this assessment, such as:

■ Fees of access rights and fishing

authorisations: The Marine Fisheries Act does not stipulate whether scientific and exploratory fishing licenses are issued for a fee. No other documentation was found that clarified the nature of fee structure, assuming one exists at all. For this assessment, it is assumed that fees do need to be paid and this information is therefore considered as not being available online, instead of being not applicable to Bangladesh's marine fisheries sector.

- **Authorities/persons that are legally entitled to issue such rights and authorisations:** Ambiguities exist with regards to the information that is publicly available for the approval process of scientific fishing applications. The Marine Fisheries Act 2020 states that such applications should be made in writing to the government, but it is unclear which government body is in fact mandated to issue these licenses (although it could be assumed it is the Director of the DoF). However, the DoF's 2015 Annual Report notes that applications for experimental

fishing must be authorised by the High Court.

- **Mandatory administrative procedures required to determine their issue:** The Marine Fisheries Act of 2020 stipulates that applications for scientific fishing licenses are considered by the government. Again, this does not clarify the authority responsible for reviewing applications, and whether other government bodies have any role in the process. The criteria upon which applications are judged are also not stated. The Environment Conservation Act (1995) mandates that all applications for industrial projects must include the submission of an Environmental and Social Impact Assessment, which is then reviewed by the Ministry for Environment, Forest and Climate Change. Successful projects are issued an Environmental Clearance Certificate. Whether this applies to scientific and exploratory fishing in

Bangladesh remains unclear.

- **Conditions relating to landings:** The conditions for landings of fish are not outlined in the Marine Fisheries Act of 2020, and no such information was found in other government documents. These conditions may include bans on selling catches for commercial purposes, or require revenues from fish sales to be paid to the government. Such rules ensure that scientific and exploratory fishing does not impact commercial fishing, or fish trade by commercially licensed vessels. It is assumed that government rules to this effect do exist and are stipulated in the conditions of issued licenses.
- **Conditions relating to catch reporting:** The Marine Fisheries Act of 2020 stipulates that the outcomes and findings of scientific fishing activities must be reported to the government.

Up to date?

As tenure arrangements generally fall under legal regulations in Bangladesh (e.g. the Marine Fisheries Act of 2020) – and such regulations need to be officially published in order to enter

into force – it is assumed that the published information on tenure arrangements is up to date.

Easy to find?

Bangladesh's Marine Fisheries Act of 2020 covers many aspects of fisheries tenure

considered for this assessment. Yet, this Act is difficult to find, e.g. it is not featured on the

website of the DoF.

While many details of scientific and exploratory fishing fisheries tenure in Bangladesh can be understood by examining legal documents and reports published on government websites, information is scattered. Also, these legal documents are often not written for the

layperson and *no succinct summaries of their contents* are provided. Gaining an understanding of how scientific and exploratory fishing fisheries are regulated in Bangladesh can therefore quickly become a cumbersome process, as it requires consulting sources of information relating to specific fisheries.

2-D | SPORT FISHING

Basic information requirements:	Available online?	Up to date? (The latest tenure rules and procedures are published)	Easy to find?
Fees of access rights and fishing authorisations	Not applicable		
Duration of such rights and authorisations	Not applicable		
Transferability of such rights and authorisations	Not applicable		
Divisibility of such rights and authorisations	Not applicable		
Authorities/persons that are legally entitled to issue such rights and authorisations	Not applicable		
Mandatory administrative procedures required to determine their issue	Not applicable		
Conditions relating to fishing effort	Not applicable		
Conditions relating to ecosystem impact	Not applicable		
Conditions relating to landings, including the sale of fish	Not applicable		
Conditions relating to catch reporting	Not applicable		
Provisions for formal mechanisms of external oversight and public consultations of fisheries tenure decisions	Not produced		
Not applicable			

Bangladesh's fisheries laws do not acknowledge the practice of recreational or sport fishing. In reports to the IOTC, the government has stated that this type of fishing does not occur in its marine waters. However, a small business sector markets marine fishing for tourism and there has been interest in further developing the sector. There is no legal framework to manage

this sector or regulate access to the fishery at present.

However, as sport or recreational fishing is still perceived as a relatively small activity in Bangladesh, this assessment considers this transparency requirements as not applicable to Bangladesh's marine fisheries sector.



3. FOREIGN FISHING ACCESS AGREEMENTS

A foreign fishing access agreement refers to a contractual arrangement that is entered into between a coastal state (e.g., Bangladesh) and a foreign party¹² that allows the foreign party's fishing vessels to operate in the coastal state's marine jurisdictional waters.¹³ These agreements provide a compensation for the coastal state, such as monetary transfers, commitments for investments and services, or reciprocal access to overseas fishing grounds for the country's national fishing fleet. A lack of transparency surrounding foreign fishing access agreements has been a persistent concern in international debates. Governments may not publicise whether foreign fishing access agreements are in active use, and the contracts of these agreements can be withheld as confidential information.

3-A | FOREIGN-FLAGGED VESSELS FISHING IN BANGLADESH WATERS

Basic information requirements:	Available online?	Up to date? <i>(Agreements that came into force within the last 3 years are published)</i>	Easy to find?
Signed contracts allowing foreign-flagged vessels to fish in Bangladesh waters	Not applicable		
Related documents, such as Memorandum of Understandings or amendments (if applicable)	Not applicable		
Not applicable			

Available online?

Fishing activities by foreign-flagged vessels fishing in Bangladesh's waters is made possible

by the Marine Fisheries Ordinance of 1983 and is also covered in the Marine Fisheries Act of

¹² Agreements can be signed between governments, between a coastal state and a union of foreign governments (such as the European Union), or between coastal states and private corporations, or associations of private companies.

¹³ Territorial Sea and Exclusive Economic Zone, in the following referred to as 'Bangladesh waters'.

2020. Foreign-flagged vessels can apply for a fishing license, with the decision for approval lying with the DoF.

However, there is *no evidence that foreign-flagged vessels are currently authorised to fish in Bangladesh's waters*, including for highly

migratory fish species.

The online availability of government information around such agreements is therefore considered as not applicable for this assessment.

3-B | BANGLADESH-FLAGGED VESSELS FISHING IN FOREIGN WATERS

Basic information requirements:	Available online?	Up to date? (Agreements that came into force within the last 3 years are published)	Easy to find?
Signed contracts allowing Bangladesh-flagged vessels to fish in third country waters	Not applicable		
Related documents, such as Memorandum of Understandings or amendments (if applicable)	Not applicable		
Not applicable			

Available online?

This assessment could not locate legislation in Bangladesh that establishes legal procedures for domestic fishing companies to apply for an authorisation to fish in third country waters or on the High Seas.

There is no evidence that Bangladesh currently holds foreign fishing access agreements with other

countries that would allow Bangladesh-flagged vessels to fish in those countries' waters.

The online availability of government information around such agreements is therefore considered as not applicable for this assessment.



4. THE STATE OF THE FISHERIES RESOURCES

Concern is mounting over decreasing marine biodiversity due to human activities, such as overfishing, climate change, habitat destruction and pollution. National authorities have the duty to collate and publish information on the state of marine fish populations in their waters. This is particularly important for fish targeted by commercial fisheries, given their overfishing can put unsustainable pressure on stocks whose continued existence is essential for national development and food security. Transparency of government information regarding the status of fish stocks, including explanations on changes over time, is a critical feature of responsible fisheries management. Such information should be presented in an accessible way that supports wider public debate, rather than only published in technical scientific reports that are unlikely to be meaningful to the layperson.

The responsibility for collating information on the health of fish stocks in Bangladesh's waters lies with the DoF, more specifically its Marine Fisheries Survey Management Unit (MFSMU).

Additionally, the government of Bangladesh has mandated the Fisheries Research Institute to conduct research and analysis on fish stocks.

4-A | NATIONAL REPORTS ON THE STATE OF MARINE FISH POPULATIONS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
National reports on Bangladesh's marine fish population, including at least the top 5 commercial fish species	Not produced		
Information on trends in the state of stocks and explanations on the reasons for change	Not produced		
Not produced			

Available online?

*The government of Bangladesh does not produce a singular report at regular intervals that summarises information on the state of its fish populations.*¹⁴ This is an important finding, due to the value of marine fish to the economy and food security of Bangladesh and the huge numbers of people that rely on marine fisheries for employment. There have also been several statements from the government of Bangladesh that acknowledge a considerable problem of decreasing marine fish populations, and substantial changes in marine fish ecology, caused by a combination of unsustainable fishing, pollution and habitat change.

The DoF's Yearbook of Fisheries Statistics provides data on fish production, but does not provide assessments of trends in fish populations. An examination of the publications available on the website of the Fisheries Research Institute also found no report or study that offered an analysis of the health of marine fish populations.

Publications provided by the Ministry of Environment, Forests and Climate Change include analysis of national biodiversity. Marine fisheries are covered in these reports, but only in a superficial way.

4-B | SCIENTIFIC STOCK ASSESSMENTS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Scientific stock assessments	No		
Information on the methods and data used to assess fish stocks			
Information on ongoing or planned efforts to update and expand fish stock assessments			
No			

¹⁴ Such reports are intended to summarise the state of marine fish populations, instead of scientific information or academic reports on individual fish species. Several countries produce such documents as standalone reports or as a section of their annual report.

Historically, only limited scientific research into marine fish populations was conducted and used to inform new fishing policies in Bangladesh. Research was largely based on sampling fish landed by fishers. However, the government's capacity to undertake research on marine fish stocks has been significantly improved in recent years. In 2016, Bangladesh purchased a research vessel – the R.V. Meen Sandhani – which was funded by the Islamic Development Bank and Malaysian Government under what is titled the 'Marine Fisheries Capacity Building Project of DoF'. Since its arrival, this vessel has undertaken over 40 surveys. In addition, the FAO and the Bangladesh Institute of Maritime Research and Development (BIMRAD) have co-operated with the DoF under the EAF Nansen project to undertake an acoustic survey using the Research Vessel R.V. Dr. Fridtjof Nansen during August 2018.

Consulting literature on Bangladesh's marine fisheries confirms that stock assessments are carried out by the government, including in partnership with international organisations. For example, the DoF's 2018 Annual Report notes that the FAO has funded a project entitled 'Technical Support for Stock Assessment of Marine Fisheries Resources in Bangladesh'.

However, *stock assessments of marine fish species are not accessible on any fisheries related websites*. The homepage of the DoF website offers a top

menu header named 'Marine Fisheries Research and Survey'. Clicking on this leads to another page with a .pdf document and a link for accessing reports from the R.V. Meen Sandhani. This link has not been working throughout this assessment. On the website of the MFSMU, a sub-page is also presented with reports from the voyages of the R.V. Meen Sandhani, but none of these links functional. Other pages on this website are 'blocked'.

The DoF's 2018 Annual Report notes that as part of the aforementioned FAO-funded project on stock assessments, data relating to stock assessments would be presented on the DoF website, though this would only be made available to authorised personnel (p.19). Such information may eventually be uploaded to the online Management Information System (MIS), as part of the DoF's website, but the system may require a username and password to access. The establishment of this MIS is listed as a deliverable of the FAO-funded project.

A number of articles published in journals make reference to stock assessments, based on government-collated data as well as assessments based on data generated from primary research among artisanal fisher communities. These include articles that appear in the Journal of Bangladesh Fisheries Research, a peer-reviewed journal managed by the Bangladesh Fisheries Research Institute.¹⁵ Government data is also occasionally used in

¹⁵ A specific example of an article providing stock assessments is available [here](#).

articles published in international journals.¹⁶ These articles offer important insights into fisheries management in Bangladesh and contain details on the methods used to understand the state of key fish stocks.

However, all of these articles are highly technical and therefore considered to be difficult for the layperson to locate, interpret and draw conclusions from.

¹⁶ Also Alam, M.S.; Liu, Q.; Nabi, M.R.-U.-; Al-Mamun, M.A. Fish Stock Assessment for Data-Poor Fisheries, with a Case Study of Tropical Hilsa Shad (*Tenualosa ilisha*) in the Water of Bangladesh. Sustainability 2021, 13, 3604.



5: LARGE-SCALE FISHERIES

Large-scale commercial fishing often represents the most important sector of marine fisheries in terms of catches, landings, and government revenues. It typically involves the use of large high-capacity boats, equipped with on-board facilities for freezing and processing seafood while at sea. These vessels often remain at sea for long periods of time and carry large crews for catching and processing fish on board. A number of important issues affecting large-scale fisheries – ranging from levels of by-catch and discards to the fair distribution of revenues – make the public availability of information on the sector a crucial element of increasing transparency in fisheries management.

5-A | VESSELS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 1 year)	Easy to find?
Registry of Bangladesh- and foreign-flagged vessels authorised to fish in Bangladesh waters	Partially	Yes	No
Name of the vessel	Yes	Yes	Yes
Legal owner of the vessel, including their address and nationality	Partially	Yes	Yes
Registered port of the vessel	No		
Flag State of the vessel	Not applicable		
Unique identification number(s) of the vessel	No		
Type of vessel, according to fishing gear or fishing method	No		
Physical characteristics of the vessel, including length, beam, tonnage and engine power	Partially	Yes	Yes
Name of the vessel's agent	Not applicable		

Access agreement under which the vessel is granted authorisation to fish	Not applicable		
Type of fishing authorisation held by the vessel	No		
Quantity and names of target species, permissible by-catch and discards that the vessel is authorised to fish, if specified in the vessel's fishing authorisation	No		
Duration of the fishing authorisation, indicating start and end date	No		
Rights holder for whom the vessel is fishing, including the name and nationality of the rights holder	No		
Country and/or regions of the High Seas where the nationally-flagged vessel is authorised to fish	Not applicable		
	To a limited extent	To a full extent	No

Available online?

The DoF does not produce a vessel registry, with details of the licenses issued to large-scale fishing vessels. Instead, a [list of vessels authorised to apply for fishing licenses](#) is maintained by the Mercantile Marine Office (MMO) of Bangladesh, which is a department of the Ministry for Shipping.

The Marine Fisheries Act of 2020 describes how

applications for licenses must include evidence of the *ownership of the vessel*. However, in the MMO's list of licensed vessels, information on vessel ownership is only available for certain vessels.

The licensed vessel list also does not provide information on licenses given to vessels for scientific or exploratory fishing.

Up to date ?

The published list of vessels maintained by the MMO is updated on a regular basis – the

department states on its sub-page that the present list was last updated in June 2021.

Easy to find?

There is no link provided from the DoF website to access the MMO's vessel list. For this reason, this assessment concludes that Bangladesh's registry for industrial fishing vessels is difficult to find. This is confirmed by [media reports](#) and

non-governmental organisation studies which estimate the number of industrial fishing vessels in the country, without knowledge of the list provided by the MMO.

5-B | PAYMENTS

Basic information requirements:	Available online?	Up to date? (Published data comprises previous calendar year)	Easy to find?
Annual total amount of payments for fishing from large-scale vessels	No		
Name of the natural person or legal entity that made the payment			
Name of the national authority who received the payment			
Date on which payment was received by the national authority			
Purpose of the payment			
	No		

Available online?

The assessment could not locate any information published by Bangladesh authorities on the revenues the government receives from authorising large-scale vessels to fish in its waters, even though such payments are required under the country's Marine Fisheries Act of 2020.

Some information on government revenues from issuing fishing licenses is provided in the DoF's Annual Report, referred to as revenues from mechanised fishing vessels (see section 6: Small-scale fisheries). However, it is unclear if this total figure relates exclusively to revenues

from fishing licenses issued to the small-scale sector, or if it also extends to revenues from the industrial sector.

It is possible that more detailed information is

published in other government reports, such as those prepared by the Treasury. However, such reports were not found during this assessment.

5-C | CATCHES WITHIN BANGLADESH WATERS

Basic information requirements:	Available online?	Up to date? (Published data comprises previous calendar year)	Easy to find?
Total quantity of annual recorded retained catches	Yes	Yes	No
Disaggregated by species or species groups	Partially	Yes	No
Disaggregated by fishing authorisations or gear type	Yes	Yes	No
Disaggregated by flag State of the vessels	Not applicable		
	To a full extent	To a full extent	No

Available online?

The most detailed information on catches by large-scale vessels authorised to fish in Bangladesh's waters can be found in the DoF's [Yearbook of Fisheries Statistics](#).

Furthermore, the DoF operates the Fisheries Resource Survey System (FRSS), which collates and publishes aggregated data on catches made of large-scale fishing vessels. This includes data on the main species landed, with data further disaggregated according to categories of fishing

vessels (fish trawlers, mid-water fish trawlers and shrimp trawlers).

Catch data for Bangladesh's large-scale fisheries also indicates the major species groups of catches. However, nearly 75% of all fish caught by the large-scale sector is classified as 'other'. With such a large proportion of the published data on fish species unspecified and vague, its value is severely diminished.

Up to date?

The latest data published by the DoF is for the period of June 2018 to July 2019. More recent information is not available. However, delays in data publication can likely be attributed to the COVID-19 pandemic – historical records show

that the Bangladesh authorities typically publish catch data for the previous year. For this reason, this assessment considers Bangladesh's catch data for large-scale vessels to be up to date.

Easy to find?

A link to download the DoF's Yearbook of Fisheries Statistics is available on the homepage of the DoF's website. However, clicking the link leads to a page with no content. Finding the

yearbooks instead requires use of external search engines (e.g. Google). For this reason, these yearbooks are considered difficult to find.

5-D | CATCHES OUTSIDE BANGLADESH WATERS

Basic information requirements:	Available online?	Up to date? <i>(Published data comprises previous calendar year)</i>	Easy to find?
Total quantity of annual recorded retained catches by nationally-flagged vessels	Not applicable		
Disaggregated by species or species groups			
Disaggregated by fishing authorisations or gear type			
Disaggregated by fishing area (i.e. High Seas and third country)			
Disaggregated by flag State of the vessels			
Not applicable			

Available online?

This assessment found no clear evidence of Bangladesh-flagged large-scale vessels operating legally in the waters of other

countries. The assessment therefore considers this transparency requirement as not applicable.

5-E | LANDINGS IN BANGLADESH PORTS

Basic information requirements:	Available online?	Up to date? (Published data comprises previous calendar year)	Easy to find?
Total quantity of annual recorded landings in Bangladesh ports of fish caught in Bangladesh waters	No		
Disaggregated by species or species groups			
Disaggregated by fishing authorisation or gear type			
Disaggregated by flag State of the vessel			
No			

Available online?

Data published by the DoF on catches by industrial vessels does not include any reference to the ports of landing. There are only two ports in Bangladesh equipped for landing fish by large-scale vessels. The government may not collate such information in a systematic way, although this assessment assumes that the

government does have access to this information.

Furthermore, no evidence exists to suggest that foreign-flagged vessels land their catches in Bangladesh, meaning this transparency element is unlikely to be highly relevant to the country.

5-F | TRANSSHIPMENTS AND LANDINGS IN FOREIGN PORTS

Basic information requirements:	Available online?	Up to date? (Published data comprises previous calendar year)	Easy to find?
Total quantity of annual recorded transshipments at sea or landings in foreign ports of fish caught in Bangladesh waters	Not applicable		
Disaggregated by species or species groups			
Disaggregated by fishing authorisation or gear type			
Disaggregated by flag State of the vessel			
	Not applicable		

Available online?

This assessment found no evidence of transshipments at sea by authorised fishing vessels, nor of landings in foreign ports

regarding fish caught in Bangladesh waters. The assessment therefore considers this transparency element as not applicable.

5-G | DISCARDS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Total quantity of annual discards from large-scale vessels authorised to fish in Bangladesh waters	No		
Disaggregated by species or species groups			
Disaggregated by fishing authorisation or gear types			
Disaggregated by flag State of the vessels			
	No		

Available online?

Bangladesh's fisheries laws and regulations – including the National Shrimp Policy – prohibit discarding of fish by shrimp trawlers. These vessels are considered to generate the largest volumes of by-catch. Industrial trawler discards in Bangladesh is thought to be prevalent, with some estimates suggesting it represents a growing problem within the industrial fishing sector.

Nevertheless, national authorities in Bangladesh publish no reports estimating the level of discards by industrial fishing vessels in the country.

The government may not collate such information in a systematic way, although this assessment assumes that the government does have access to this information.

5-H | FISHING EFFORT

Basic information requirements:	Available online?	Up to date? (Published data comprises previous calendar year)	Easy to find?
Total annual recorded fishing effort	Partially	No	No
Disaggregated by fishery or gear types	No	No	No
Disaggregated by flag State of the vessel	Not applicable		
	To a limited extent	No	No

Available online?

Data on the industrial fishing sector published in the DoF's Yearbook of Fisheries Statistics does not cover the duration of fishing vessels' operations. However, the DoF does collect this data. Illustrating this is the fact that summary

information on the Catch Per Unit Effort of different segments of Bangladesh's industrial fisheries was presented in the draft FMP for the Industrial Fisheries Sector.

Up to date?

The aforementioned FMP for the Industrial Fisheries Sector includes government information up to 2018. There are no indications that the DoF will produce regular reports further updating this information. Furthermore, the

FMP is only available online in a draft version. Therefore, this assessment considers the published information on fishing efforts as outdated.

Easy to find?

As already stated, the draft FMP for the Industrial Fisheries Sector – which contains certain information on fishing effort – is not easily found on the DoF website. However, the draft document can be located by using an external search engine (e.g. Google). Such a search reveals a dedicated sub-page run by the DoF that focuses on the World Bank project. This sub-page includes a link to the Industrial Fisheries Management Plan, but is not clearly

visible on the main page of the DoF's own website, and users searching the DoF website to find coastal and marine fisheries information are therefore likely to remain unaware of its existence.

Similarly, stakeholders less familiar with the fisheries sector – such as the media or parliamentarians – might not even be aware of the existence of this plans and the information contained therein.



6. SMALL-SCALE FISHERIES

In many countries, commercial small-scale fisheries – also commonly referred to as artisanal fisheries – account for the vast majority of people engaged in fishing activities, whether they be full-time, part-time or seasonal. It is widely recognised that this sector can play a vital role in national food security, the economic well-being of large numbers of people, as well as the culture of coastal communities. However, official information on the small-scale sector is often limited and inadequate public resources are allocated to collating this information. This represents a potential barrier to responsible fisheries management. It may also marginalise small-scale fisheries in national debates and policy implementation.

As stated in the section on fisheries tenure arrangements, government statistics distinguish what is most commonly referred to as Bangladesh's *artisanal fisheries sector between mechanised fleet and the non-mechanised fleet*.

However, these distinctions are not clarified in legal documents. Furthermore, while government information does distinguish marine fisheries from other types of fisheries in the country, the nature of Bangladesh's geography renders such a distinction ambiguous. Distinguishing between fishery zones is an arbitrary decision, as recognised by the FAO's Coordinating Party on Fisheries Statistics. Yet Bangladesh is an exceptional country given the extensive scale and seasonal variability of its estuarine habitats and

mangrove forests, areas where large amounts of artisan fisheries are also located. There are no maps used in fisheries legislation to clearly demarcate boundaries between the ocean, estuarine habitats and freshwater bodies. In practice, fish and fishers do not exist in distinct waters, so official data may give a false impression of clear boundaries. Official data on fisheries production includes information on estuarine fisheries alongside freshwater fisheries (meaning estuarine fisheries is not included under marine fisheries), and fisheries in the Sundarbans mangrove forest area is also presented separately from marine fisheries. This assessment reports on the data available for marine fisheries as presented by the Bangladesh authorities.

6-A | VESSELS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Total number of commercial small-scale fishing vessels	Yes	No	No
Disaggregated by categories of fishing or gear types	Yes	No	No
	To a full extent	No	No

Available online?

The number of vessels operating in the small-scale marine fisheries sector is included in the DoF's *Yearbook of Fisheries Statistics*. According to the last available publication, a total of 67,669 vessels were operating in the small-scale marine fisheries sector. Information

is disaggregated between mechanised and non-mechanised fishing vessels. Furthermore, the number of gear types used by marine fishing vessels is presented, demonstrating that fishing vessels use multiple gears.

Up to date?

Yearbooks of Fisheries Statistics are published every year, although the last publication covers the 2018-19 fishing season. As a result of the COVID-19 pandemic, this assessment allows a degree of flexibility for delayed government reports. Therefore, the delayed publication of the latest yearbook is not considered when assessing if information is up to date.

However, official data on the number of fishing

vessels in the small-scale sector – as well as the gear types used – has remained identical going back to the 2015-16 fishing season (mechanised vessels = 32,859, non-mechanised vessels = 34,810), suggesting government data on this area has not been updated since 2015.

This assessment therefore considers the published information on vessels in Bangladesh's small-scale fisheries as outdated.

Easy to find?

The main website of the DoF contains a link to download the Yearbook of Fisheries Statistics. However, the link leads to a page with no content. As such, finding these yearbooks

requires the use of external search engines (e.g. Google) and is therefore considered to be difficult to find.

6-B | LICENSES

Basic information requirements:	Available online?	Up to date? (Published data comprises previous calendar year)	Easy to find?
Total number of licenses issued to commercial small-scale fishing vessels	Partially	Yes	Yes
Disaggregated by categories of fishing authorisations	No		
	To a limited extent	To a full extent	To a full extent

Available online?

The *Annual Reports* of the DoF provide data on the number of licenses issued to mechanised fishing vessels in Bangladesh's marine fisheries sector. For 2018-19, this number was 1,561. It is unclear whether this number also covers licenses issued to industrial trawlers.

Additionally, a large disparity appears to exist between the number of licences issued (1,561) and the total number of mechanised fishing vessels in Bangladesh's marine fisheries sector,

which as described in the *Yearbook of Fisheries Statistics* is 32,859. No reason is provided to explain why the vast majority of fishing vessels do not appear to hold a license.

Data published by the Mercantile Marine Office (MMO) on the number of vessels it registers also contrasts with the number of vessels issued licenses by the DoF. For the year 2018, the MMO reported that 11,209 boats had registered with its office (not including trawler vessels).

Up to date?

The 2018 Annual Report of the DoF is the latest publication which refers to the number of small-scale fishing licenses. More recent information is not available. However, delays in data publication can likely be attributed to the COVID-19 pandemic – historical records show

that the Bangladesh authorities typically publish Annual Reports more regularly. For this exceptional reason, this assessment considers the published information on small-scale fishing licences to be up to date.

Easy to find?

The 2018 Annual Report can be easily found from the website of the DoF or by using an

external search engine (e.g. Google).

6-C | FISHERS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Total number of small-scale fishers	Partially	Yes	Yes
Disaggregated by gender information	No		
Disaggregated by type of occupation ¹⁷	No		
	To a limited extent	To a full extent	To a full extent

Available online?

The DoF's 2018 [Annual Report](#) provides estimates of the number of people working on non-mechanised fishing vessels (3-5 fishers per vessel), and on mechanised fishing vessels (10

to 25). However, the DoF publishes no other data elaborating on fisher numbers, including those that engage in fishing without a boat. No estimates exist on the number of women

¹⁷ Proportion of full-time work, seasonal or part-time fishing.

fishers, including those engaged in gleaning activities, although it is well documented that many women in Bangladesh engage in such activities. There are equally no estimates on the numbers of part-time or seasonal fishers.

The DoF's Yearbook of Fisheries Statistics does not include any data on the number of people engaged in marine fishing across the small-scale sector.

It should be noted that the DoF has developed a *registry of fishers in Bangladesh*. Details about the registry are difficult to locate, although a fisher's inclusion on the registry may correspond to the allocation of National ID cards. The homepage of the DoF website provides a link to a 'List of Registered Fishermen', but, as previously mentioned, this link redirects users to the Marine Information System (MIS). Access to this system requires a password and username, although a default password and username are currently provided, meaning access is open to anyone. The data provided in this online resource, however, is incomplete. It should be noted that *data on the number of fishers issued national ID cards is unlikely to represent a reliable source of information on the total number of fishers in the country*. This is because ID cards are not issued to all fishers, and it has also been widely reported that non-fishers have fraudulently obtained ID cards in the past. This

has emerged as a controversial issue in the allocation of food assistance packages for hilsa fishers, as people who are not fishers benefit from this government support.¹⁸ Improving allocation of national ID cards and developing a registry of fishers in Bangladesh are activities targeted by the World Bank-financed 'Sustainable Coastal and Marine Fisheries Project'. It was not possible to find any information indicating the success of this project component or whether more information on this issue will be published by the government in the near future.

Other government reports do provide total estimates of the number of marine fishers in Bangladesh. These estimates are replicated in certain other non-governmental publications, reaching a wide audience. It is, for example, common to read that over half a million people in Bangladesh are engaged in marine fishing. Yet, this assessment could not locate the origin of this statistic. There appears to be no empirical basis for this estimate (i.e. a national survey or census).

Beyond the DoF, the *Bangladesh Bureau of Statistics (BBS)* holds the mandate to collate information on productive sectors of the economy. However, no survey undertaken by the BBS has collated data on employment in marine fisheries. For example, the BBS

¹⁸ Mredul, Md. Mahamudul Hasan & Uddin, Md & Pervez, A.K.M. & Akkas, Antara. (2020). Food aid programme during restricted hilsa fishing period: effectiveness and management perspective. Journal of Fisheries. 8. 752-761.

¹⁹ For example: <https://www.mdpi.com/2071-1050/10/4/1254/htm> and <http://bilsbd.org/wp-content/uploads/2018/01/Labour-in-Fishing-Sector-of-Bangladesh.pdf>

undertakes an annual [Labour Force Survey](#), however, data on fisheries employment is included under a general category of employment in agriculture, fisheries and livestock. It is impossible to disaggregate general employment in fisheries from the Labour Force Surveys, as well as employment specifically in marine fisheries.

The BBS also undertakes a periodic [Agriculture Census](#), whose [latest report](#) was published in 2019 (and before that in 2010). This report includes information on fisheries, but only related to aquaculture. Fisheries targeting wild fish populations is not included in this survey. Similarly, in the [2010 Survey of the Informal Sector in Bangladesh](#) – undertaken by the BBS in collaboration with the Asian Development Bank – data on income generating activities included

fisheries, but was aggregated with agriculture, hunting and forestry.

The government of Bangladesh therefore does not undertake national research that facilitates monitoring of employment rates across the country's small-scale marine fisheries, including information on incomes, poverty levels, access to health care and gender dimensions. Some international organisations and academic research institutes conduct research that partially addresses this information gap.¹⁹ However, such research focuses exclusively on specific geographical cases studies, or is carried out on an ad hoc basis and is therefore dated. It is unclear whether Bangladesh's national authorities incorporate these non-governmental sources of information into the evaluation of government policy implementation.

Up to date?

The 2018 Annual Report of the DoF is the latest publication which refers to estimates of marine fisher numbers. More recent information is not available. However, delays in data publication can likely be attributed to the COVID-19 pandemic – historical records show that the

Bangladesh authorities typically publish Annual Reports more regularly. For this exceptional reason, this assessment considers the published information on numbers of marine fishers to be up to date.

Easy to find?

The DoF's 2018 Annual Report can be easily found from the website of the DoF or by using

an external search engine (e.g. Google).

6-D | PAYMENTS

Basic information requirements:	Available online?	Up to date? <i>(Published data comprises previous calendar year)</i>	Easy to find?
Total amount of payments made from commercial small-scale fisheries	Yes	Yes	Yes
Disaggregated by payments for fishing authorisations, catches and landings	No		
Disaggregated by categories of fishing authorisations or gear types	No		
Disaggregated by recipient of payments	No		
	To a limited extent	To a full extent	To a full extent

Available online?

Alongside information published on the number of licenses issued to the mechanised fishing fleet, the DoF also provides information in its [Annual Reports](#) on revenues earned from these

licenses. This information is provided as an aggregated sum and is not disaggregated according to the payments made by different categories of fishing vessels.

Up to date?

The DoF's 2018 Annual Report is the latest publication which refers to payments made by the commercial small-scale fisheries sector of Bangladesh. More recent information is not available. However, delays in data publication can likely be attributed to the COVID-19

pandemic – historical records show that the Bangladesh authorities typically publish Annual Reports more regularly. For this exceptional reason, this assessment considers the published information on commercial small-scale payments to be up to date.

Easy to find?

The DoF's 2018 Annual Report can be easily found from the website of the DoF or by using

an external search engine (e.g. Google).

6-E | CATCHES

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Total quantity of catches made by the small-scale sector	Yes	Yes	No
Disaggregated by species	Partially	Yes	No
Disaggregated by categories of fishing authorisations and gear types	Yes	Yes	No
	To a full extent	To a full extent	No

Available online?

Information on catches made by fishers from Bangladesh's small-scale sector can be found online as part of the DoF's *Yearbook of Fisheries Statistics*. This yearbook provides the total annual catches of the artisanal marine fisheries sector, disaggregated by catches attributed to the mechanised sector and catches attributed to

the non-mechanised sector. Catch data is presented for nine species of fish and is further categorised by types of fishing gear.

It should be noted that a very large proportion of the catches attributed to artisanal fisheries (nearly 70%) is classified as 'other' fish species.

Up to date?

Yearbooks of Fisheries Statistics are published every year, although the last publication covers

the 2018-19 fishing season. As a result of the COVID-19 pandemic, this assessment allows a

degree of flexibility for delayed government reports. Therefore, the delayed publication of

the latest yearbook is not considered when assessing if information is up to date.

Easy to find?

The main website of the DoF contains a link to download the Yearbook of Fisheries Statistics. However, the link leads to a page with no content. As such, finding these yearbooks

requires the use of an external search engine (e.g. Google) and is therefore considered to be difficult to find.

6-F | DISCARDS

Basic information requirements:	Available online?	Up to date? <i>(Published data is not older than 3 years)</i>	Easy to find?
Total volumes of discards by the small-scale sector	Not produced		
Disaggregated by species			
Disaggregated by categories of fishing authorisations and gear types			
Not produced			

Available online?

This assessment found no information on discards from the artisanal fisheries sector during reviews of official government reports. It is therefore unclear whether such information has not been collected by Bangladesh's national authorities, or whether such information has

indeed been collected, but is simply not published online.

For this assessment, it is assumed such information has not yet been produced (i.e. collected).

Up to date?

Information on fisheries imports that is published online by Bangladesh's national authorities is seen as up to date.

Easy to find?

Fisheries trade data is difficult to locate in Bangladesh, as shown above, resulting from the fact that information is scattered across multiple agencies and websites, without a central location to consolidate such information.



7. POST-HARVEST SECTOR AND FISH TRADE

Fish is the most traded agricultural product in the world. The commerce it generates provides important revenues and foreign exchange. The fisheries post-harvest sector – which includes the processing and selling of fish – often accounts for the majority of jobs created across the industry, and, in many countries, the sector represents an important source of income for women. The inflow and outflow of fish from a country also has substantial implications on national food availability. Widespread public access to information is therefore critical for ensuring properly informed national debates around the post-harvest sector's management and the resulting social, economic and food security implications.

7-A | IMPORTS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 2 years)	Easy to find?
Total quantity of imports of fish and fish products	Partially	Yes	No
Disaggregated by species and fish products	No		
Disaggregated by country of origin	No		
	To a limited extent	To a full extent	No

Available online?

In Bangladesh, trade data is collected by the [Ministry of Commerce](#), while specific data on exports (though not on imports) is also collated by the [Bangladesh Export Promotion Bureau](#). However, while detailed statistical reports are published by both organisations, statistics on fish imports fall under general categories. It is

therefore impossible to access precise figures that relate to imports of marine fish products, as well as imports of fish products that are derived from farms as opposed to the sea.

Additional data on trade of fish products is compiled by the Bangladesh Bureau of Statistics (BBS), via its [annual report](#) on [Foreign Trade](#)

Statistics. This report provides information on values of imports and exports of fish products. However, this data again does not provide any insights on imports specific to marine fisheries as information is aggregated into general product categories (i.e. fish fillet, live fish etc). In total, the BBS only uses six categories to describe marine fisheries products in its trade database.

The DoF's Yearbooks of Fisheries Statistics also

do not cover information on imports.

It should be highlighted that there are numerous non-government reports which document these gaps in government trade data (for imports as well as exports), particularly for important fish products, such as shark fins. Additional, more in-depth analysis is available through academic articles which provide access to otherwise unpublished government data.

Up to date?

Information on fisheries imports that is published online by Bangladesh's national

authorities is seen as up to date.

Easy to find?

Fisheries trade data is difficult to locate in Bangladesh, as shown above, resulting from the fact that information is scattered across multiple

agencies and websites, without a central location to consolidate such information.

7-B | EXPORTS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 2 years)	Easy to find?
Total quantity of exports of fish and fish products	Partially	Yes	No
Disaggregated by species and fish products	No		
Disaggregated by country of destination	No		
	To a limited extent	To a full extent	No

Available online?

In Bangladesh, export data is collected by the *Ministry of Commerce as well as the Bangladesh Export Promotion Bureau*. However, while detailed statistical reports are published by both organisations, statistics on fish exports fall under general categories. It is therefore impossible to access precise figures that relate to exports of marine fish products, as well as exports of fish products that are derived from farms as opposed to the sea.

The DoF's Yearbook of Fisheries Statistics do not cover information on exports, and the DoF's Annual Reports only provide limited information on export data. Such information includes total values of shrimp exports and total values of fish exports. Data is highly aggregated, so it is impossible to distinguish exports of marine fish products from exports of other freshwater or farmed fish products.

Up to date?

Information on fisheries exports that is published online by Bangladesh's national

authorities is seen as up to date.

Easy to find?

Fisheries trade data is difficult to locate in Bangladesh, as shown above, resulting from the fact that information is scattered across multiple agencies and websites, without a central location to consolidate such information. locate

in Bangladesh, as shown above, resulting from the fact that information is scattered across multiple agencies and websites, without a central location to consolidate such information.

7-C | EMPLOYMENT IN COMMERCIAL FISHERIES

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Total number of people employed in commercial fisheries sectors	No		

Disaggregated by gender			
Disaggregated by sub-sectors			
No			

Available online?

In Bangladesh, no government information is published online providing estimates of employment (formal and informal) in the fisheries sector, including small-scale fisheries, marine harvest, and across the post-harvest sub-sectors. Surveys that could provide this information are undertaken by the BBS, but fail to include questions that are specific to either fisheries or the marine fisheries sub-sector.

This must be considered as an important gap in official data for Bangladesh's fisheries sector. Specifically, this gap may contribute to forms of discrimination and marginalisation of the

importance of women in fisheries. Furthermore, several reports document child labour in the fisheries sector, including allegations of forced labour.

Undertaking surveys on employment and livelihoods in fisheries is listed as an ongoing activity of the World Bank-financed 'Sustainable Coastal and Marine Fisheries Project'. However, the results of this project could not be found online. This assessment therefore assumes some employment data is held by the government, but is not published online.

7-D | EMPLOYMENT IN INFORMAL FISHERIES

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Total number of people employed in informal fisheries sectors	No		
Disaggregated by gender			
Disaggregated by sub-sectors			
No			

Available online?

The assessment did not find government reports that provide estimates of the total number of people employed in the informal fisheries sector. However, it is assumed the

government has estimates based on the surveys conducted on employment and livelihoods in the fisheries sector, but such data is not published online.



8. FISHERIES LAW ENFORCEMENT

There has been growing international awareness of the scale and impacts of non-compliance with national laws and regulations, such as those associated with 'illegal, unreported and unregulated' (IUU) fishing. Increasing attention is focusing on how public authorities of coastal states respond to this challenge, including on their ability to enforce compliance and administer effective and fair criminal justice. However, reporting on these efforts is often neglected, undermining informed public debates on how the challenges arising from these illicit activities can be most effectively addressed.

8-A | ENFORCEMENT OF LAWS

The Marine Fisheries Act of 2020 describes the fisheries sector. sanctions for illegal activities in Bangladesh's

Basic information requirements:	Available online?	Up to date? (Published data is not older than 2 years)	Easy to find?
National activities and strategies used for ensuring compliance of fishing vessels and the post-harvest sector with national legislation	Partially	Partially	Partially
Financial and human resources deployed by the government to ensure compliance with national legislation	No		
Total numbers of inspections of fishing vessels at sea and in ports	No		
	To a limited extent	To a limited extent	To a limited extent

Available online?

Government information on the enforcement of laws across the marine fisheries sector can be found in two publications:

- The *Annual Report* of the DoF provides an overview of national activities and strategies, although this does not include information on resources deployed.
- The *draft Fisheries Management Plan for Industrial Fishing* in Bangladesh.

Combined, these sources of information focus on management, control and surveillance activities of industrial fishing and unauthorised foreign fishing. Less information is available on actions and strategies in the artisanal sector.

Although government reports suggest the development of a national strategy document to eradicate IUU fishing, this has not yet been

produced.

This assessment therefore considers that government information on strategies and activities to ensure compliance with laws is only partially available. Some information is published, but is not comprehensive and suffers from important gaps, particularly regarding the artisanal sector. It should be noted that illegal fishing in the Bay of Bengal represents a regional challenge and there are concerns persist around the harsh treatment of fishers accused of illegally fishing in foreign countries' Exclusive Economic Zones. Such issues highlight the importance of having information on human rights and due process when enforcing laws available in the public domain, yet these areas are also characterised by a lack of transparency.

Up to date?

The DoF's 2018 Annual Report is the latest publication which provides an overview of national law enforcement activities and strategies. More recent information is not available. However, delays in data publication can likely be attributed to the COVID-19 pandemic – historical records show that the Bangladesh authorities typically publish Annual Reports more regularly.

However, additional information relevant for this transparency element is also published in the draft Fisheries Management Plan for Industrial Fishing in Bangladesh, and as it is unclear whether this draft version contains up to date information, this assessment considers information on national activities and strategies for enforcing fisheries laws to be only partially up to date.

Easy to find?

The DoF's 2018 Annual Report can be easily found from the website of the DoF or by using an external search engine (e.g. Google).

On the other hand, the draft Fisheries Management Plan for Industrial Fishing in Bangladesh is difficult to find and requires

knowledge of the plan's existence to be able to search for it via an external search engine.

Information on national activities and strategies for enforcing fisheries laws is therefore assessed as only partially easy to find.

8-B | SANCTIONS FOR MAJOR OFFENCES

Basic information requirements:	Available online?	Up to date? (Published data covers the last 5 years)	Easy to find?
Record of convictions for major offences in the fisheries sector	No		
Name of the company or vessel owner, the nature of the offence and the penalty imposed			
Nature of the offence			
Penalty imposed			
	No		

Available online?

It was not possible to find records of convictions or sanctions for major offences in the marine fisheries sector of Bangladesh. This information is not included in any DoF publication.

This assessment also attempted to locate court cases from legal databases in Bangladesh, but was unsuccessful in locating any recent trials

relating to offences committed in the marine fisheries sector.

It is assumed that there have been convictions for serious offences in the marine fisheries sector. Therefore, this assessment considers this information as not published, as opposed to not applicable.



9. LABOUR STANDARDS

Fisheries provide jobs and income for large numbers of people, both in the harvest and post-harvest sectors. However, it is widely recognised that employment in fisheries is among the most arduous and dangerous in the world. Public authorities have a duty to ensure they apply high labour standards to all parts of their fisheries sector and that their efforts to enforce these standards are well documented. This is critical information for ensuring the rights of those working in the sector are respected.

The *Ministry of Labour and Employment* is the government body responsible for monitoring and enforcing laws on labour standards in Bangladesh, including the country's fisheries sector.

This assessment found no national labour laws in Bangladesh that are specific to the marine fisheries sector. The labour laws applicable to the fisheries sector are those established in the 2006 Bangladesh Labour Act, which apply to all industries across the country.

Bangladesh has been a member of the

International Labour Organisation (ILO) since 1972. The country has acceded to and/or ratified several international instruments of the ILO directly applicable to the fishing sector, such as the 'Seafarers' Identity Documents Convention (Revised), 2003, as amended (No. 185)' or the 'Maritime Labour Convention, 2006 (MLC, 2006)'. On the other hand, several ILO labour standards have not been yet signed, such as the 'Seafarers' Welfare Convention, 1987 (No. 163)' or the 'Work in Fishing Convention, 2007 (No. 188)'.

9-A | ENFORCEMENT OF LABOUR STANDARDS

Basic information requirements:	Available online?	Up to date? (New laws that came into force within the last 5 years are published)	Easy to find?
National strategies and activities for ensuring compliance with labour standards in the fisheries sector	No		

Financial and human resources deployed by the government to ensure compliance with labour standards	No		
No			

Available online?

Considerable attention – at both national and international level – has been given to improving labour standards in Bangladesh’s shrimp farming industry, but relatively little to standards in marine fisheries. A 2015 report by the [Bangladesh Institute of Labour Studies](#) on ‘[Labour in Fishing Sector of Bangladesh - Mapping, Status and Awareness about Rights](#)’ confirmed widespread labour abuses in the marine fishing sector, but had not yet been comprehensively addressed by national authorities. Many fisher labourers surveyed as part of this report were not knowledgeable about their rights. Less than 20% of surveyed fishers were members of trade unions able to promote their rights, and there were no trade unions specifically working to represent the interests of women in the marine fisheries sector.

There is no information published online by Bangladesh’s national authorities about the strategies and activities for enforcing labour standards in the country’s marine fisheries sector. It is therefore unclear whether such strategies do or do not exist.

Furthermore, there is no documentation published online regarding the financial and human resources deployed by the government to ensure compliance with labour standards, although it is assumed that the government does provide some resources to this end.

This assessment assumes that strategies, activities and resources are assigned to enforce labour standards across Bangladesh’s marine fisheries sector, but that information on these efforts are is not published online.

9-B | SANCTIONS FOR LABOUR STANDARD OFFENCES

Basic information requirements:	Available online?	Up to date? (Published data is not older than 2 years)	Easy to find?
Total number of labour standard offences in the fisheries sector that have been resolved by national authorities	No		
No			

Available online?

There is no information published online by Bangladesh's national authorities regarding labour standard offences in the country's marine fisheries sector. It is therefore unclear whether such offences do or do not occur.

This assessment assumes that some cases relating to labour standard offences are taken

up by national authorities (e.g. as mentioned in the 2015 Bangladesh Institute of Labour Studies report on 'Labour in Fishing Sector of Bangladesh - Mapping, Status and Awareness about Rights').

This assessment therefore considers that such information exists but is not published online.



10. FISHERIES SUBSIDIES

The extent and purpose of government subsidies offered to a country's fisheries sector has long been one of the most controversial themes in international debates on responsible fisheries management. Perhaps more than any other single factor, subsidies are seen as the source of a range of problems, such as overfishing, illegal fishing and unfair benefit sharing.

10-A | GOVERNMENT FINANCIAL TRANSFERS OR SUBSIDIES

Basic information requirements:	Available online?	Up to date? (Previous calendar year)	Easy to find?
Total value of financial transfers or subsidies to the fisheries sector	No		
Disaggregated by type/purpose			
Disaggregated by recipient			
Average annual value of any fuel subsidies per unit of fuel (in nominal and percentage terms)			
No			

Available online?

Bangladesh's government provides multiple forms of direct and indirect subsidies to its marine fisheries sector. This includes, for example, a food assistance programme aimed at supporting artisanal fishers as compensation for temporary fisheries closures. In the industrial

sector, national authorities recently raised USD 7 million to finance a project to help expand commercial tuna fisheries. According to research published by the United Nations Environment Programme (UNEP) in 2004, Bangladesh's fishing sector has also historically

been supported via duty-free imports of capital machinery and raw materials, fiscal incentives for export, income tax-rebates, fast customs clearance and subsidised credit.

This assessment found no report by the DoF or any other government agency that either listed the types of subsidies provided to the marine fisheries sector or provided analysis of their

values.

However, with regards to fuel subsidies given by Bangladesh's government to its marine fisheries sector, the 2004 UNEP research documented a 15% reduction in the price of fuel made available to fishers via a Value Added Tax rebate. Whether this rebate is still offered in Bangladesh is difficult to confirm.



11. OFFICIAL DEVELOPMENT ASSISTANCE

Official development assistance (ODA) can represent an important source of funds to support the development of a country's fisheries sector. However, it is common knowledge that ODA is not always delivered in the most effective manner. This is exacerbated in situations where public information on the value, purpose and outcomes of public sector development projects remains unpublished. This can also lead to a lack of public participation in decision-making over how ODA should be used.

11-A | PUBLIC SECTOR DEVELOPMENT PROJECTS

Basic information requirements:	Available online?	Up to date? (Not older than 2 years)	Easy to find?
List of public sector projects related to fisheries and marine conservation, funded by bilateral, multilateral and private donors	Partially	Partially	Partially
Project value	Partially	Partially	Partially
Project purpose and outputs	Partially	Partially	Partially
Project evaluations	No		
	To a limited extent	To a limited extent	To a limited extent

Available online?

The DoF website contains a link that brings users from its homepage to a list of nine 'ongoing projects' in the fisheries sector. This list includes projects financed by external donors. The list provides a short title of the project, and

– for four of the nine featured projects – a hyperlink is provided to additional page(s) of information. However, one of the four hyperlinks leads to a page with no information. Overall, the list offers very limited insights into

these nine ongoing projects.

The list of ongoing fisheries-related public sector projects is also seen as incomplete. Information compiled by the International Aid Transparency Initiative identifies other relevant projects not listed on the DoF website, including an FAO-financed project entitled 'Technical Assistance to Reduce Food Loss in the Capture Fisheries Supply Chain'.

Additionally, the DoF is the lead recipient of a World Bank-financed project entitled '*Bangladesh Sustainable Coastal and Marine Fisheries Project*' (BSCMFP). This [project](#) has a budget of USD 280 million, making it one of the largest marine fisheries projects in the world - yet it confusingly does not appear among the nine ongoing projects listed on the DoF website, although the project remains active. However, the DoF has a separate [website](#) dedicated to this project, which is accessible via the homepage of DoF (shown under 'Important links'). The reasons as to why the BSCMFP has a standalone website, and also is not listed on the DoF's ongoing project sub-page, is not apparent. Additionally, the link to the BSCMFP webpage only refers to the project by its acronym.

The BSCMFP's sub-page contains limited information. The page entitled 'Publication and Reports' is empty, while the only programmatic reports available on this sub-page are the project's initial Environmental Impact Assessment and the draft Fisheries Management Plan for the Industrial Fisheries. The decision to publish this information exclusively through a dedicated BSCFMP

webpage and not on the main website of the DoF is difficult to understand. A brochure for the BSCFMP is in fact highlighted on the homepage of the DoF, but leads users to an empty page. Given the considerable budget for the project and the extensive list of activities it is financing, the lack of information on this website is surprising. It is of course worth noting that the World Bank's own website provides documentation on the project's implementation. However, this alone cannot be seen to strengthen public access to government information at a national level.

Also, governments are expected to provide citizens with information about recently completed ODA projects. In fact, several important ODA projects have recently been concluded in Bangladesh, whose impacts and results are without doubt highly relevant for the public and the country's marine fisheries sector. This includes, for example, *the ECOFISH* project jointly undertaken by the DoF, and the WorldFish Centre and the FAO, and financed by USAID. The project ran for five years – ending in December 2019 - though the [full completion report](#) was only released in March 2021. No information on this project is available on the DoF website.

Project evaluations are considered standard practice among partner organisations including the FAO and the WorldFish Centre, and are financed through project funds, so this assessment considers that these reports do exist, but are not published.

ODA data in Bangladesh is collated by the

[Economic Relations Division \(ERD\)](#), which falls under the Ministry of Finance. However, the ERD does not provide a searchable list of projects in Bangladesh.

While the website of the DoF represents a limited source of information on ODA projects, *information provided in its Annual Reports is more comprehensive*. Each report provides a list of ODA projects in the fisheries sector, and the list included in the last Annual Report – for 2018 –

appears complete, with 21 entries in total. This list includes the financial value of the project together with the main objectives and project activities.

This assessment has limited its research to fisheries-specific ODA projects. However, it is relevant to note that Bangladesh receives ODA for other projects targeting marine conservation and the development of the blue economy, which have a bearing on fisheries development.

Up to date?

The DoF's 2018 Annual Report is the latest publication which provides information on ongoing ODA projects for the country's marine fisheries sector. More recent information is not available. However, delays in data publication can likely be attributed to the COVID-19 pandemic – historical records show that the

Bangladesh authorities typically publish Annual Reports more regularly.

However, as information on several concluded projects is not published online at all, this assessment considers information on ODAs as being only partially up to date.

Easy to find?

Due to the fact that information on fisheries-specific public sector development projects is found on a variety of government webpages (e.g. the BSCMFP has its own website yet is missing from the list of ongoing projects

on the DoF's website) – and there are sometimes no clear linkages to facilitate navigation between these sites – this assessment considers this information on ODA projects in Bangladesh as being only partially easy to find.



12. BENEFICIAL OWNERSHIP

Beneficial ownership – that is, the natural person who ultimately owns or controls a business or transaction – is a topic grabbing global attention. This interest also extends to the fisheries sector. A lack of transparency around ownership of fishing companies, vessels or licenses is linked to several important policy debates, including non-compliance with tax laws, evasion of criminal prosecutions for illegal fishing, corruption and conflicts of interests, and also the excessive concentration of ownership in segments of the fisheries sector.

12-A | LEGAL BASIS FOR BENEFICIAL OWNERSHIP TRANSPARENCY

Basic information requirements:	Available online?	Up to date? (The latest legal basis is published online)	Easy to find?
Legal basis for beneficial ownership transparency	Yes	Yes	Yes
Bangladesh's legal definition of beneficial ownership	Yes	Yes	Yes
Thresholds used to determine when ownership and control is disclosed	Yes	Yes	Yes
Disclosure exceptions	Yes	Yes	Yes
	To a full extent	To a full extent	To a full extent

Available online?

The Bangladesh Financial Intelligence Unit (BFIU) – as part of the Central Bank of Bangladesh – publishes the relevant rules and guidance notes regarding beneficial ownership for the country.

Under the 2019 Money Laundering Prevention Rules (MLPR), section 2(4), a beneficial owner refers to the natural person(s) who ultimately owns or controls a customer and/or the natural person on whose behalf a transaction is being

conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement or who hold 20% or more of the shares of a company. Under the MLPR, 'ultimately owns or controls' and 'ultimate effective control' refers to a situation in which ownership/control is exercised through a chain of ownership or by means of control other than

direct control.

The complementary 'Guidelines for Beneficial Owner', issued by the BFIU, provide additional information on beneficial ownership transparency in Bangladesh (e.g. on disclosure exemptions).

Up to date?

The most recent legal provisions regarding beneficial ownership in Bangladesh are

published online on the website of the BFIU.

Easy to find?

The legal basis – as well as complementary guidelines – are easy to find on the BFIU website

or through external search engines.

12-B | BENEFICIAL OWNERSHIP REGISTRY

Basic information requirements:	Available online?	Up to date? (Data confirmed on annual basis)	Easy to find?
Beneficial ownership register	Not produced		
Beneficial owner(s) and their interests			
Declarations of shares or interest held indirectly			
Reasons for not specifying any beneficial owners			
Declaring entity			
Not produced			

Available online?

No evidence was found to indicate that Bangladesh's national authorities maintain a central register for beneficial owners across all sectors of the economy.

However, the National Plan of Action to Prevent, Deter and Eliminate IUU (2019) states that Bangladesh shall maintain a register of the operators or beneficial owners of vessels flying its flag, including their nationality. In this way, Bangladesh will be able to identify its nationals, should one of its vessels be implicated in IUU fishing activities. Work on this item was

supposed to start in 2020 and be completed by 2024, with each year including an additional category of fishing vessels (starting with industrial fishing vessels, followed by large-motorized artisanal vessels, medium-sized motorized artisanal vessels, and eventually small non-motorized artisanal vessels). However, there is no indication of who the responsible agency to set this up is.

Therefore, this assessment considers a beneficial ownership registry as not produced yet.

12-C | BENEFICIAL OWNERSHIP DISCLOSURE IN FISHERIES

Basic information requirements:	Available online?	Up to date? (New rules/procedures published in last 2 years)	Easy to find?
Rules and procedures for incorporating beneficial ownership in filings by organisations to agencies regulating access to fisheries	Not produced		
Not produced			

Available online?

The rules and procedures regarding beneficial ownership transparency – most notably documented in the 'Guidelines for Beneficial Owner' of the BFIU – provide general guidance on the identification of beneficial owners. This document is seen as being cross-sectoral. Since

the fisheries sector is not explicitly excluded from these guidelines, they are seen as also generally applying to the fisheries sector.

This assessment, however, found no evidence of whether the national authorities of Bangladesh are working to produce dedicated rules and

procedures to incorporate beneficial ownership into companies' filings to agencies that regulate access to fisheries. It is therefore unclear as to whether such rules and procedures for the fisheries sector exist at all.

This assessment assumes that no such fisheries-specific rules and procedures for beneficial ownership have yet been produced by national authorities.



TAKING STOCK

Online Transparency of Fisheries
Management Information



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