



IUU Risk Intelligence

Putting Compliance First

GLOBAL EVALUATION OF FISHERIES MONITORING CONTROL AND SURVEILLANCE IN 84 COUNTRIES

BANGLADESH - COUNTRY REPORT

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SUMMARY

This evaluation of Fisheries Monitoring Control and Surveillance report for Bangladesh is one of 84 such country evaluations that covers nations landing 92% of world's fish catch. Using a wide range of interviews and in-country consultations with both military and civilian agencies, the report exemplifies the best attempt by the author(s) at evaluation of MCS compliance using 12 questions derived from international fisheries laws. The twelve questions are divided into two evaluation fields, (MCS Infrastructure and Inspections). Complete details of the methods and results of this global evaluation would be published shortly through IUU Risk Intelligence website.

Over a five-year period, this global assessment has been subjected to several cross-checks from both regional and global MCS experts familiar with compliance aspects in the country concerned. Uncertainty in assigning each score is depicted explicitly through score range. However, the author(s) are aware that gaps may remain for some aspects. The lead author remains open at any time to comments, and revisions will be made upon submission of evidence where necessary. Throughout the report, extreme precaution has been taken to maintain confidentiality of individuals who were willing to share information but expressed an inclination to remain anonymous out of concern for their job security, and information from such sources was cited as 'anonymous' throughout the report.

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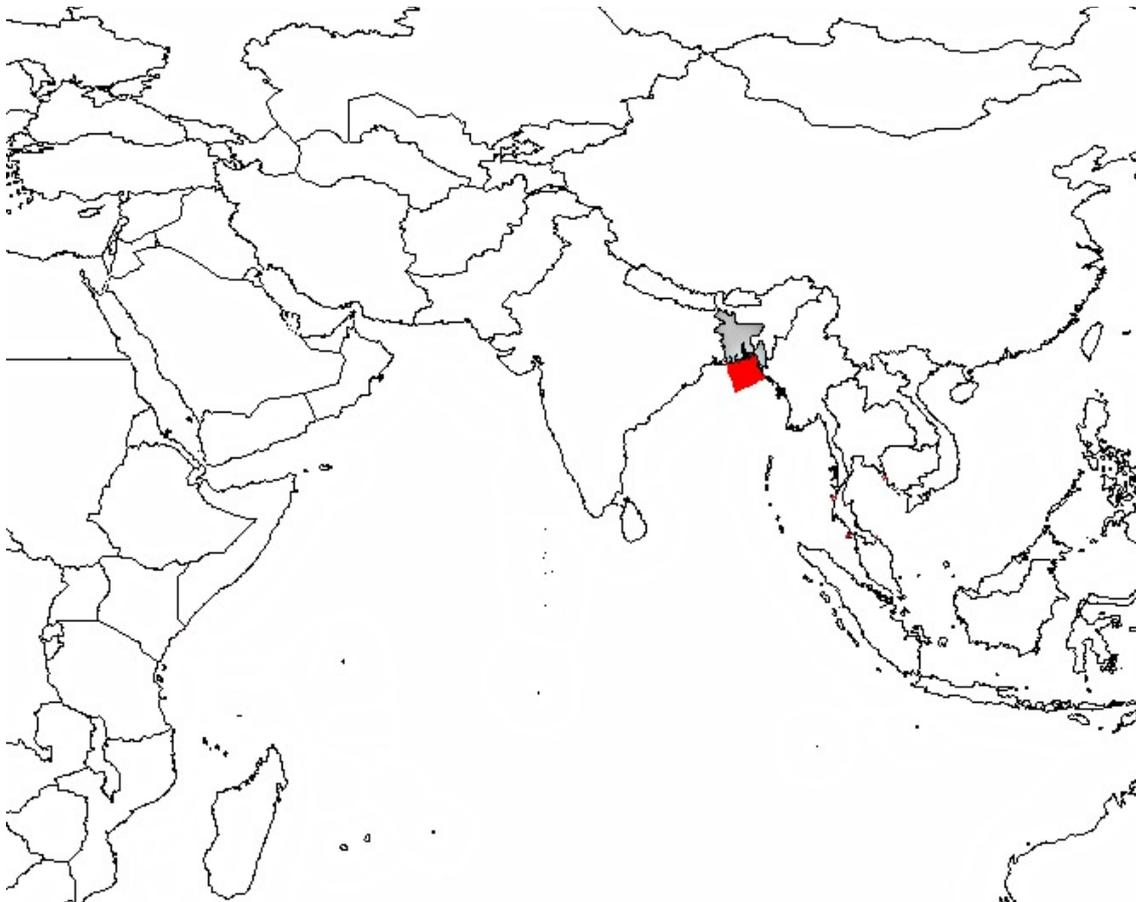
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BANGLADESH – COUNTRY REPORT



FAO landings (2013): 588,988 tonnes

Fisheries contribution to GDP (2014): 4%

Law of the Sea (Ratification / Accession): 27th July 2001

Coastline: 580 km

RFMO Membership: None

Patrolling Agencies: Bangladesh Coast Guard

Rank	Priority for maritime security tasks
1.	Contraband Trafficking
2.	Piracy
3.	Narcotics Trafficking & Organised Crime

SECTION 1: MCS INFRASTRUCTURE

1. Does the country have adequate surveillance infrastructure (patrol aircraft, sea based patrol vessels and coastal patrols) to effectively patrol fisheries resources within its EEZ?

Score: 5.5

Score Range: 5-7

Moderate enforcement capability, limited to patrols in some coastal provinces (Khan 2010; Khan 2008; Jane 2012; Mazumdar 2015; Nowshin 2015). The country appears to have very limited surveillance infrastructure in proportion to vast brackish-water area (*incl. mangrove creeks*), large number of remote landing centers, and an EEZ area of 164,000 km² (ICSF 2006). In 2006, Bangladesh Coast Guard (BCG) commissioned two patrol ships “CGS *Porte Grande*” and “CGS *Shetgang*” to improve its enforcement capabilities (BCG 2007). Bangladesh Coast Guard has 13 patrol vessels including 1 coastal patrol vessel (CGS *Tawheed*), 1 inshore patrol vessel (CGS *Ruposi Bangla*), 1 riverine patrol vessel (CGS *Pabna*) and 1 fast patrol boat (CGS *Sheetgang*) (BCG 2015b; Anon 2008). BCG also has 23 Metal Shark Defiant 38 ft. patrol craft for coastal operations (Mazumdar 2015). In 2017, BCG received four offshore patrol vessels (CGS *Syed Nazrul*, CGS *Tajuddin*, CGS *Karamuzzaman*, CGS *Mansoor Ali*) from Italy (Former *Minerva*-class corvettes converted into offshore patrol vessels by Italian ship-builder Fincantieri).

Bangladesh Coast Guard (BCG) is the main fisheries enforcement agency (*since December 1995*) responsible for implementation of territorial waters as per the regulations in the Maritime Zones Act 1974 and Marine Fisheries Ordinance 1983. In addition, BCG is also responsible for monitoring control and surveillance of waterways in the Sundarban mangrove forest (BCG 2015a). Bangladesh Navy is authorized to verify license and fishing gear of trawlers and mechanized vessels mostly in offshore waters.

2. Does the country have adequate trained officers to conduct MCS operations?

Score: 2.5

Score Range: 2-4

There is shortage of trained personnel in Bangladesh Department of Fisheries, BCG and Bangladesh navy for fisheries patrolling duties (BOBP 2008; Khan 2008; Mohammad 2012). There are large numbers of inaccessible landing sites along the coast. This problem is further aggravated due to lack of adequately



trained manpower at both operational and management levels in MCS division (Chowdhury *et al.* 1998; Mohammad 2011).

No information is available on compliance or enforcement competence of these authorities in the marine fisheries sector. Major problems in curtailing piracy of fishing boats and trawlers are reportedly due to shortage of manpower and patrol vessels (Hussain and Huq 2010).

3. Does the country have adequate management plans to monitor their fishing vessels on the high seas?

Score: 0

Score Range: 0-0

No, Bangladeshi fishing vessels are not monitored on the high seas. Many Bangladeshi trawlers have been apprehended for poaching in Burmese and Indian waters over the last three decades. See Pramod and Pitcher (2006); Pramod *et al.*, (2008) for more information.

4. What proportion of fishing vessels is equipped with vessel monitoring system (VMS) to monitor their movements on a continuous basis?

Score: 0

Score Range: 0-0

No, fishing vessels in Bangladesh are not equipped with vessel monitoring system. Refer to Pramod and Pitcher (2006) for more information on this aspect.

5. What percentage of fishing vessels (>20 m OAL) is monitored through onboard observers at sea (for major commercial fish stocks)?

Score: 0

Score Range: 0-0

None. Fishing vessels in Bangladesh are not monitored through onboard observers at sea. Refer Pramod and Pitcher (2006) for more information on this aspect.

SECTION 2: INSPECTIONS

6. How often fishing vessels are inspected at sea (Identification by sight and boarding for inspections)?

Score: 4

Score Range: 3-5

Bangladesh does not have an at-sea boarding and inspection capability and uses only occasional port inspections with lack of formalized procedures for scrutiny. Marine resource management laws are not updated regularly. Absence of a data management system with cross checks on catches and landings further aggravate this problem (Flewwelling, 2001; Hussain and Huq 2010; Mohammad 2011, 2012; IISS 2013). According to BOBP (2008); Nowshin (2015); Cordesman and Taoukan (2014); IHS (2012) reports Bangladesh Coast Guard is not equipped with adequate resources for MCS operations.

7. How often fishing vessels are scrutinized through aerial patrols?

Score: 2.5

Score Range: 2-4

Occasionally, Bangladesh Navy has acquired limited capability to patrol coastal waters a few times each month. In June 2013, Bangladesh navy received delivery of two Dornier 228-NG aircraft from Germany. The aircraft are equipped with “a 360° surveillance radar, Telephonics RDR-1700B radar and operator console as well as HF, VHF/UHF and VHF FM radios. A search-and-rescue (SAR) direction finder, 6 observer seats and 2 bubble windows – one on either side – further enhance the aircraft’s search and patrol capabilities” (RUAG 2013; Acharjee 2013).

8. How often are fishing vessels inspected at landing centers and docks for foreign and domestic vessels (Dockside monitoring)?

Score: 2

Score Range: 2-4

Limited information exists on this aspect. However, available information suggests that there are very few fisheries inspections at landing centres and docks. See Pramod and Pitcher (2006); Pramod *et al.*, (2008); Hussain and Huq (2010) documents for more details. According to Anon (2010) report, around 30-40 trawlers are inspected at fishing ports each month (421 mechanized boat inspections are reported in 2010).

The above data should be treated with caution, as there are no regular harbour inspections of trawlers in Bangladesh. Inspections of small-scale fishing boats that contribute more than 80% of national catches are also very low. Commercial fish are transshipped and sold illegally across land and sea borders of India and Myanmar. Catches traded inland after drying are also

significantly under-reported in national fisheries statistics. Bartering and trade of seafood also occurs between fishing vessels at sea. Data on seafood trade both within the country and with neighbouring countries is poorly assessed undermining stock assessments and accurate accounting of catches every year. More than 60% of the Hilsha caught during spawning season is illegally stored in cold storages and sold in fish markets openly without any seizures. “*Pohela Boishakh*” is celebrated each year (*coincides with annual Hilsha migration to rivers upstream*) with a Hilsha feast and fish are sold at record prices during this event. The illegal harvest of fish has never received traction as many fish dealers and businessmen provide nets to innocent fishers to catch Hilsha and then illegally trade those fish to get enormous profits. Recently, several hundred tonnes of under-sized hilsha were seized from warehouses where illegal consignments were stacked for the Boishakh festival (Anon, *pers.comm.*, 2017).

9. Are there adequate plans to monitor catches in coastal areas through coastal patrols (beach patrols, small-scale fishing gear and catch inspections) on a regular basis?

Score: 3.5

Score Range: 2-4

An organized MCS system does not exist and monitoring of artisanal sector is very poor (Murshed-e-Jahan *et al.*, 2014; Khan 2007; Khan 2008; Hussain and Hoq 2010; BOBP 2010; Viswanathan *et al.*, 2010). In recent years, Bangladesh Navy has implemented fishery protection campaigns, often to coincide with the *Hilsha* breeding season (from January to March) to protect the country’s most popular fish. During “*Operation Jhatka*” campaign every year the Coast Guard often seize illegal fishing nets and impound fish fry, with those found fishing illegally usually fined or jailed (DoF, 2006; BCG 2006).

10. Are all the catches that are caught in this jurisdiction at sea accounted for (i.e., unreported Trans-shipments at sea)?

Score: 0

Score Range: 0-0

No, the country does not have adequate infrastructure to check unreported transshipments at sea. Refer Pramod and Pitcher (2006); Pramod *et al.*, (2008) for more information. Bangladesh ratified the UN Fish Stocks Agreement (Ratified on 5 November 2012). See Q.8 for more information.

11. Are vessels required to undergo inspection of equipment and fishing gear for every fishing trip?

Score: 4

Score Range: 2-4

No, but routine gear inspections are conducted at landing centers during spawning period for some commercial fishes such as Hilsha. Anon (2010) report suggests that a certain number of trawlers are inspected for gear and equipment compliance each year. In 2006, Coast Guard captured seized 3,445,490 metres of illegal fishing gear worth Tk-57,178,750/00 (BCG, 2006). Illegal nets are openly sold in many districts and Mobile courts often seize and burn them to discourage use of illegal gear (Anon 2015). Refer Pramod *et al.*, (2008); Pramod and Pitcher (2006); Hussain and Hoq (2010); BOBP (2010); Roy and Eagle (2017); Islam *et al.*, (2016) documents for more information on this aspect. According to BOBP (2008) there are 185,000 shrimp fry collectors directly involved in marine fisheries sector in Bangladesh.

Small-scale fisheries in brackish waters are far better patrolled than industrial fisheries during closed seasons. Illegal fishing gear are regularly seized and confiscated during the hilsha breeding period in brackish waters, but inspections are rare during remainder of the year. Poverty and easy access to illegal fishing nets has allowed the destructive practice of catching juvenile shrimps, hilsa and fish fry to continue in mangrove forests and brackishwater creeks. Use of illegal current nets, set nets and drift nets with small-mesh size is rampant in mangroves, estuaries and coastal delta leading to depletion of juvenile fish stocks (Anon, *pers.comm.*, 2017).

12. Has the country taken adequate measures to revise and implement national fisheries laws to curtail illegal fishing practices; and does it comply with national and international laws signed?

Score: 4

Score Range: 2-4

The Marine Fisheries Ordinance of 1983 (*Ordinance No. XXXV*) is the main national legislation for fisheries management in Bangladesh waters. The country does not report NPOA on IUU Fishing to fight and eliminate illegal fishing. Bangladesh has ratified the UN Fish Stocks Agreement on November 5, 2012. The country is not a party to FAO Compliance Agreement and the UN Port State Measures Agreement.

See Islam *et al.*, (2017); Pramod and Pitcher (2006); Pramod *et al.*, (2008); Mohammad (2011); Mohammed and Wahab (2013); Cordesman and Toukan



(2014); Hoq (2014); Viswanathan *et al.*, (2010); Shamsuzzaman and Islam (2018) documents for more information.

Flag of Convenience	No
Vessels on the RFMO - IUU vessel list	No

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Note:

Bibliography and other notes relevant to this country report including methods, results and discussion for the global evaluation of 84 countries would be released shortly through IUU Risk Intelligence website (<http://iuriskintelligence.com/>). (The author can be contacted at pramod.raju@gmail.com to provide any feedback).

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