



IUU Risk Intelligence

Putting Compliance First

GLOBAL EVALUATION OF FISHERIES MONITORING CONTROL AND SURVEILLANCE IN 84 COUNTRIES

BANGLADESH - COUNTRY REPORT

GANAPATHIRAJU PRAMOD

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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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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; Bangladesh Navy



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

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: 7

Score Range: 5-7

Adequate enforcement capability; not used adequately for fisheries surveillance (Khan 2010; Khan 2008; Jane 2012; Mazumdar 2015; Nowshin 2015; IISS 2020). The country appears to have moderate surveillance infrastructure in proportion to the vast riverine and brackish water area (incl. mangrove creeks), encompassing 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 shipbuilder 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 Sundarbans mangrove forest (BCG 2015a). Bangladesh Coast Guard has four 87-meter Offshore Patrol Vessels (CGS *Syed Nazrul*; CGS *Tajuddin*; CGS *Mansoor Ali*; CGS *Kamaruzzaman*); seven Inshore Patrol Vessels (CGS *Sobuj Bangla*; CGS *Shamol Bangla*; CGS *Sonar Bangla*; CGS *Apurbo Bangla*; CGS *Aparajeyo Bangla*; CGS *Shadin Bangla*; CGS *Joy Bangla*); one 38.5-meter length Inshore Patrol Vessel (CGS *R/Bangla*); four 38.7-meter Coastal Patrol Vessels (CGS *Tanveer*; CGS *Tawfiq*; CGS *Tawheed*; CGS *Tamjeed*); two 43.4-meter Fast Patrol Boats (CGS *Sonadia*; CGS *Kutubdia*); two 31.2-meter Fast Patrol Boats (CGS *P/Grande*; CGS *Shetgang*); and five 75-foot Riverine Patrol Vessels (CGS *Patuakhali*; CGS *Noakhali*; CGS *Pabna*; CGS *Bogra*; CGS *Rangamati*) – (BCG 2018a; BCG 2018b).



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: 5

Score Range: 4-5

There is shortage of trained personnel in Bangladesh Department of Fisheries, BCG and Bangladesh navy for patrols covering artisanal fisheries (BOBP 2008; Khan 2008; Mohammad 2012; Nazrul 2020). 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: 2

Score Range: 1-2

Current reports suggest that Bangladeshi fishing vessels are not authorized to operate on the high seas (IOTC 2021). Data submitted to IOTC also suggests that there are no authorized purse seiners or longliners in Bangladesh (IOTC 2021). Limited tracking is now available for industrial fishing trawlers operating in deeper waters; but these vessels are not reported to venture beyond EEZ limits. Bangladeshi fishing boats have been apprehended for poaching in Burmese and Indian waters over the last three decades. However, the extent of incursions by Bangladeshi fishing boats into neighbouring countries is relatively low in comparison to other Asian countries. See Pramod and Pitcher (2006); Pramod *et al.*, (2008); DoF (2020); Nazrul (2020) reports 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: 5

Score Range: 4-5

53% of industrial fishing vessels (133 of the 250 trawlers) are equipped with VTMS as of March 2021 with full coverage expected by the end of 2022 (BMFCBP 2019). Refer to IOTC (2019); BSCMF (2021) reports for relevant information on this aspect. Data submitted to IOTC suggest that there are no authorized tuna longliners, purse seiners or supply vessels in Bangladesh (IOTC 2021).

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 reported. Fishing vessels in Bangladesh are not monitored through onboard observers at sea. See BSCMF (2021); IOTC (2019); IOTC (2021); Pramod and Pitcher (2006) reports 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: 4.5

Score Range: 3-5

Extent of maritime patrols remain unreported. Bangladesh does not have adequate at-sea boarding's and uses occasional port inspections for checking majority of domestic fishing vessels. Absence of a data management system with cross checks of reported catches against vessel logbooks further aggravate this problem (Flewwelling, 2001; Hussain and Huq 2010; Mohammad 2011, 2012). According to BOBP (2008); Nowshin (2015); Cordesman and Taoukan (2014); IHS (2012); IISS (2020) reports.

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

Score: 4.5

Score Range: 2-5

Occasionally (Extent of aerial patrols for fisheries surveillance remain unknown). Bangladesh Navy has acquired moderate capability to patrol its maritime territory. 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; IISS 2020). Bangladesh navy has placed order for two more Dornier-228 aircraft in 2017 (RUAG Aviation 2017).

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

Score: 4

Score Range: 2-5

Existing information suggests that very small number of artisanal landing beaches and Chittagong port receive enough inspections. See Pramod and Pitcher (2006); Pramod *et al.*, (2008); Hussain and Huq (2010); IOTC (2021) reports for more details. According to Anon (2010) report, around 30-40 trawlers were inspected at fishing ports each month (421 mechanized boat inspections were reported in 2010). Bangladesh ratified the UN Port State Measures Agreement on 20 December 2019.

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. 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. 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. More than 60% of the Hilsha caught during spawning season is illegally stored in cold storages and sold in fish markets openly. “*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).

Seafood companies have also illegally acquired trawlers from foreign countries without following proper registration requirements (IUU & Flags of Convenience vessels in many instances). Bangladesh Coast Guard is investigating cases of four fishing trawlers (imported without registration) and

clearance from Customs. According to Bangladesh Coast Guard, two fishing trawlers “*Shah Amanat MT- 31*” and “*FB Sunera-1*” were imported in 2014 from Thailand without proper authorisations; the two vessels were subsequently detained on Karnaphuli river before handing them over to Customs (BCG 2014). In 2019, two large-industrial trawlers “*Sea View*” and “*Sea Wind*” (of Thai origin) with a history of illegal fishing in Somalia were also detained in Chittagong port on the pretext of repairs (BBC 2020).

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: 5

Score Range: 3-5

An organized MCS system does not exist but monitoring of artisanal sector is more rigorous during fishing ban days (Murshed-e-Jahan *et al.*, 2014; Khan 2007; Khan 2008; Hussain and Hoq 2010; BOBP 2010; Viswanathan *et al.*, 2010; Kuperan and Jahan 2010). In recent years, Bangladesh Navy has implemented fishery protection campaigns, often to coincide with the *Hilsa* breeding season (from January to March). During “*Operation Jhatka*” campaign every year Bangladesh Coast Guard & Bangladesh Navy seize illegal fishing nets, impound juvenile fish (*locally referred as jatka*), and jail illegal fishers (DoF, 2006; BCG 2006). 3240 Fishers’ Groups (FGs) with fisheries co-management committees have been formed in 365 fishing villages to improve fisheries practices and eradicate illegal fishing (BSCMF 2021).

Industrial trawlers and small-scale fishing boats are reported to engage in illegal fishing within marine protected areas and five marine sanctuaries leading to accidental capture of marine mammals (3 species of turtles and 11 species of sharks) (WCS 2018).

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

Score: 5

Score Range: 4-7

No, the country does not have adequate infrastructure to check unreported transshipments at sea. Data submitted to IOTC suggest that there are no authorized tuna longliners, purse seiners or supply vessels in Bangladesh (IOTC 2021). Refer Pramod and Pitcher (2006); Pramod *et al.*, (2008); IOTC (2019); IOTC (2021); DoF (2020) reports 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: 5

Score Range: 3-5

No, but routine gear inspections are conducted at landing centers during Hilsa fishing ban period than the remainder of the year. Country is ranked as one the top five nations in Southeast Asia for confiscating illegal fishing nets in small-scale fisheries, with regular seizure and burning of millions of meters of fishing nets each year.

Anon (2010) report suggests that a certain number of trawlers are inspected for gear and equipment compliance each year. Mobile squads often seize and burn illegal nets to discourage poachers (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 illegal 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 brackish water 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 serial 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: 5

Score Range: 3-5

On 29 January 2020 the new Marine Fisheries Act-2020 was placed before parliament (Anon 2020) which will replace Marine Fisheries Ordinance of 1983. The country has drafted a NPOA on IUU Fishing in 2019 to fight and eliminate illegal fishing and is awaiting formal adoption soon. Bangladesh has ratified

the UN Fish Stocks Agreement on 5 November 2012 and UN Port State Measures Agreement on 20 December 2019. The country is not a party to FAO Compliance 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); Nazrul (2020); BBC (2020) documents for more information.

Significant number of artisanal fishing vessels are yet to be registered; with some recent studies suggesting that less than 18% of the total artisanal fleet is licensed (BSCMF 2021). Unregistered vessels contribute to loss of both taxation and licensing revenue to the state. Vessel registration exercise is necessary for unregistered fishing boats and wooden trawlers to understand the extent of IUU fishing in small-scale fisheries.

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

RFMO	Year of assessment	Compliant	Partially Compliant	Not Compliant	Source
IOTC	2020		Yes		IOTC (2021)

Last Updated: 29 December 2020



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 (<https://iuuriskintelligence.com/>). (The author can be contacted at pramod.raju@gmail.com to provide any feedback).

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