



Fisheries  
Transparency  
Initiative

# TAKING STOCK

Online Transparency of Fisheries  
Management Information



**PEOPLE'S REPUBLIC  
OF BANGLADESH**

2021 Summary Assessment Report

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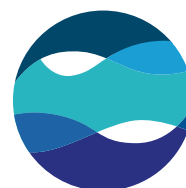
Every effort has been made to verify the accuracy of the information contained in this assessment. All information was believed to be correct as of December 2021. Nevertheless, the Fisheries Transparency Initiative (FiTI) cannot accept responsibility for any consequences resulting from the use of this assessment or its contents by others.

Furthermore, in conducting this assessment, the FiTI did not investigate the veracity or completeness of the published information and did not make any judgement about the integrity of the information or practices disclosed.

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

The Fisheries Transparency Initiative (FiTI) is a global multi-stakeholder initiative that strengthens transparency and collaboration in marine fisheries management.

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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[www.fiti.global](http://www.fiti.global)

## **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.*



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**Bangladesh's TAKING STOCK: Online Transparency of Fisheries Management Information** assessment consists of this Summary Assessment Report, as well as an in-depth Detailed Assessment Report. Both reports, as well as information on the methodology, can be found at:  
[www.fiti.global/taking-stock](http://www.fiti.global/taking-stock)

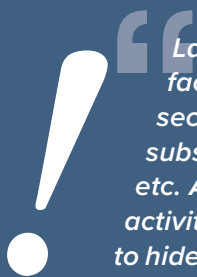


# SUSTAINABLE FISHERIES NEED TRANSPARENCY

For millennia, those who dedicated themselves to fishing, whether for food, income or recreation, did not need to worry about the sustainable management of this natural resource. Fish stocks replenished themselves with ease. **This is no longer the case.** The ocean is under increasing threats from myriad impacts, like climate change, pollution, and overfishing.

**Governments have the fundamental obligation to manage common resources, such as fish, on behalf of their citizens.** But this invokes a complex challenge: to ensure that fishing and fish trade contribute to income, employment, food and nutrition for millions of people, while conserving marine biodiversity for present and future generations.

**Public availability of information is critical to achieving sustainable fisheries. Yet, transparency in fisheries management has not been a priority.** Many governments do not disclose basic information on their fisheries sectors, such as laws, permits, fishing agreements, stock assessments, financial contributions, catch data and subsidies. Additionally, there are widespread concerns that companies are not consistently reporting accurate information on catches, fishing practices and payments to governments. The data that is already publicly available is too often incomplete, outdated, unverified, or not readily accessible.



*Lack of basic transparency could be seen as an underlying facilitator of all the negative aspects of the global fisheries sector – IUU fishing, fleet overcapacity, overfishing, ill-directed subsidies, corruption, poor fisheries management decisions, etc. A more transparent sector would place a spotlight on such activities whenever they occur, making it harder for perpetrators to hide behind the current veil of secrecy and requiring immediate action to be taken to correct the wrong.*

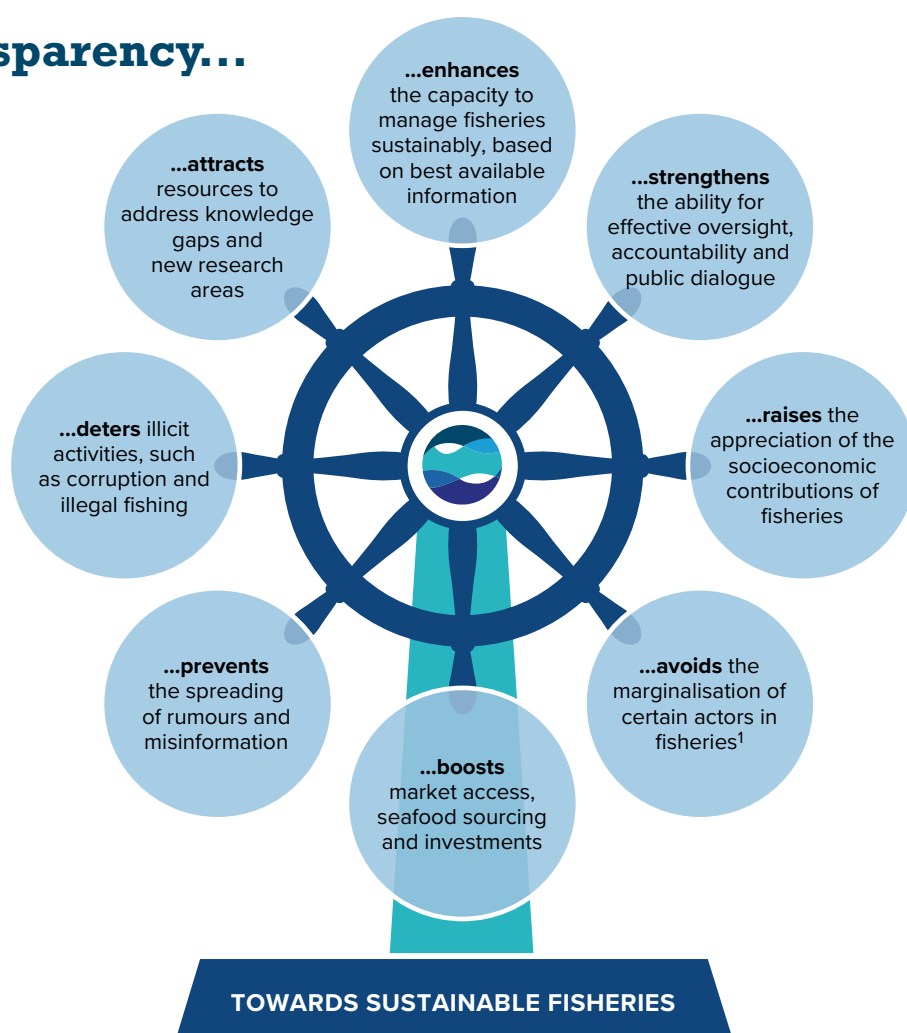
Food and Agriculture Organization of the United Nations (FAO)  
The State of World Fisheries and Aquaculture 2010



Enhancing transparency in fisheries management appeals to all stakeholders that appreciate the enormous value of marine fisheries – whether that relates to food and nutrition security, employment, the value to national economies, or the cultural importance of fishing.

**Transparency in fisheries management yields multiple benefits, and their relevance and applicability vary depending on the national context.**

## Transparency...



Promoting these positive features of fisheries lies at the heart of the Fisheries Transparency Initiative (FiTI).



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<sup>1</sup> In particular small-scale fisheries and women.

## Transparency is not voluntary. It is a government's duty and a citizen's right!

The provision of accessible, timely and credible information on a country's marine fisheries is increasingly becoming a **legal requirement for governments**, stemming, among other things, from Freedom of Information laws. Such laws are frequently based on three key principles: *public participation*, *access to justice* and *access to information*. The last of these principles implies that the public should be able to obtain environmental information (including information about their country's fisheries sector) with only limited, explicitly defined exceptions arising from justifiable confidentiality claims and security matters.



Achieving transparency and increasing public access to government information has been a policy promoted by the government in Bangladesh for many years. In 2009, Bangladesh enacted the Right to Information Act<sup>2</sup> and the National ICT Policy<sup>3</sup> to ensure access to information for its citizens.

This Act is implemented under the guidance of the Information Commission of Bangladesh (ICB) which is mandated to oversee the **dissemination of accurate information across different public bodies, both proactively and in response to citizens' requests**.

According to Chapter 1 of the Right to Information Act, each authority is responsible for publishing and circulating information relevant to citizens on any decision, proceeding or activity proposed or executed.

Moreover, Chapter 2 outlines the various means at the disposal of national authorities to meet the requirements of the Act. These include, but are not limited to, yearly reports (reports prepared by the authority containing details of important decisions) and/or press releases to highlight matters of public interest.

- As of today (December 2021), the government of Bangladesh has not committed to join the **Fisheries Transparency Initiative (FiTI)**.
- Bangladesh is not a member country of the **Open Government Partnership (OGP)**.



The importance of public access to government information is also emphasised in the UN Sustainable Development Goals (SDGs). Target 16.10 of the SDGs calls on all states to adopt legislation or policies guaranteeing the right to information, which is essential not only for the achievement of Goal 16, but is an enabler to achieving other SDGs.

<sup>2</sup> [http://old.moi.gov.bd/RTI/RTI\\_English.pdf](http://old.moi.gov.bd/RTI/RTI_English.pdf)

<sup>3</sup> <https://policy.gov.bd/policy/ict-division?lang=en>












## ABOUT THIS ASSESSMENT

This is the first time that Bangladesh has been assessed regarding the online transparency of its marine fisheries sector.

This TAKING STOCK assessment covers 12 thematic areas of fisheries management, as defined by the FiTI Standard.<sup>4</sup>

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.

- |    |                                                                                     |                                                           |     |                                                                                      |                                    |
|----|-------------------------------------------------------------------------------------|-----------------------------------------------------------|-----|--------------------------------------------------------------------------------------|------------------------------------|
| #1 |    | Fisheries Laws, Regulations and Official Policy Documents | #7  |    | Post-Harvest Sector and Fish Trade |
| #2 |   | Fisheries Tenure Arrangements                             | #8  |   | Fisheries Law Enforcement          |
| #3 |  | Foreign Fishing Access Agreements                         | #9  |  | Labour Standards                   |
| #4 |  | The State of the Fisheries Resources                      | #10 |  | Fisheries Subsidies                |
| #5 |  | Large-Scale Fisheries                                     | #11 |  | Official Development Assistance    |
| #6 |  | Small-Scale Fisheries                                     | #12 |  | Beneficial Ownership               |

For this assessment, these 12 thematic areas have been broken down into a total of **38 transparency elements**.<sup>5</sup>

<sup>4</sup> <https://www.fiti.global/fiti-standard>

<sup>5</sup> An overview of these 38 transparency elements can be found in the section 'Key findings'.

This assessment evaluates whether basic information on Bangladesh's marine fisheries sector is **freely available** on government websites, whether it is **up to date** and whether it is **easy to find**.<sup>6</sup>



**Additionally, this assessment:**

- Considers whether information is published in a way that renders it easy to **(re)use**, e.g. to download, search and filter;
- Documents instances of **'good transparency practices'**, where published information allows non-experts to draw reliable conclusions it;<sup>7</sup> and
- Proposes practical **recommendations** to improve online transparency around Bangladesh's marine fisheries sector.



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This report is intended to support national authorities in Bangladesh to improve transparency in fisheries management and to stimulate interest in fisheries among a wide range of stakeholders.

It also establishes a comprehensive benchmark for evaluating progress over time.



<sup>6</sup> For more information about the assessment's methodology, please refer to <https://www.fiti.global/taking-stock/methodology>

<sup>7</sup> For example, national authorities may utilise innovative techniques to help visualise information, such as online information systems or fact sheets.





*Public disclosure of information cannot be directly equated with actual progress towards sustainable fisheries management.*

**A lack of transparency in fisheries management is not always a deliberate state of affairs.** Governments with poor levels of transparency are often viewed negatively, as if driven by the desire to hide information from public scrutiny. However, what may be perceived as opacity or secretive practices is often the result of other factors, such as the complexity of the fisheries sector, a lack of technology, expertise and staff, or legal concerns. Some government ministries or national agencies, particularly those that are underfunded, may not prioritise transparency. Unfortunately, these arguments can also be used as a convenient excuse to avoid scrutiny.

A low level of transparency in this TAKING STOCK assessment may not be a sign of wrongdoing, but rather highlights an opportunity for national authorities to enhance disclosure to stakeholders. Likewise, a high level illustrates strong disclosure systems, but this may not reflect operational success regarding the sustainable management of marine fisheries.

Transparency should also not be misinterpreted as a direct indicator for ethical behaviour, such as honesty and integrity.

**This assessment is therefore not an end in itself.** Instead, it takes stock of current disclosure practices against an internationally recognised transparency framework – the FiTI Standard – with a view to starting a conversation with all relevant stakeholders in Bangladesh's marine fisheries sector.

The ambition is that this and future **TAKING STOCK** assessments will contribute to making government transparency the global norm in fisheries management.

# CONTEXTUAL INFORMATION ON MARINE FISHERIES IN BANGLADESH



**Length of coastline:**  
3,306 km

**Exclusive fishing zone:**  
39,868 km<sup>2</sup>

**Marine Protected Area:<sup>8</sup>**  
4,926 km<sup>2</sup>



## Recent developments relevant to Bangladesh's marine fisheries sector



In 2020, Bangladesh enacted the Marine Fisheries Act to improve governance of the fisheries sector. The Act includes a provision for imposing sanctions on foreign nationals illegally fishing within Bangladesh's maritime boundary. Other provisions introduce mandatory features for fishing boats and trawlers to obtain licences, and also increase the maximum licence duration from one year to two years.



Hilsa is one of the most consumed fish in Bangladesh. Between 1990-2000, this important fishery experienced dramatic decline, prompting the government to establish the Hilsa Fishery Management Action Plan (HFMAP) in 2005. The Plan guides sustainable fishing of this species during specific times of the year as well as conservation activities. This includes annual bans on Hilsa fishing, which has allowed the species to replenish, although slowly.



Bangladesh is implementing the 'Sustainable Coastal and Marine Fisheries Project' to increase coastal and marine fisheries' contribution to the economy, poverty reduction, and environmental stability. This project is financed by the World Bank.

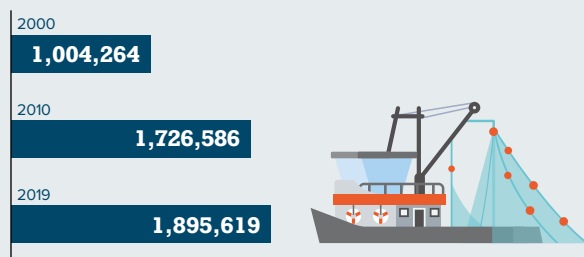
<sup>8</sup> Under the United Nations Sustainable Development Goal 14.5, countries (including Bangladesh) committed to conserve at least 10 per cent of their coastal and marine areas, consistent with national and international law and based on the best available scientific evidence. To date, Bangladesh has announced two marine protected areas: the 'Swatch of No Ground', part of the Bay of Bengal which covers 1,738 km<sup>2</sup>, and an area of 3,188 km<sup>2</sup> around the Nijuhm Dwip Island.

Bangladesh's diverse fisheries sector plays a crucial role for the country's economic and social sustenance. The sector is comprised of inland, aquaculture, and marine production.<sup>9</sup>

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### Capture fisheries production

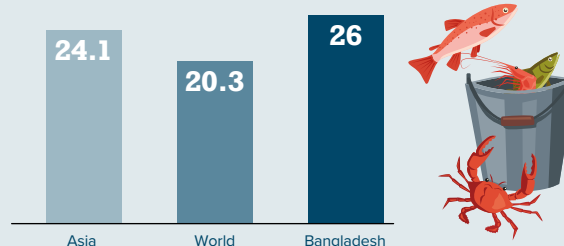
(tonnes, live weight)



Source: FAO Fishery and Aquaculture Statistics 2019 (published in 2021)  
FAO Fishery and Aquaculture Statistics 2008 (published in 2010)

### Fish available for consumption

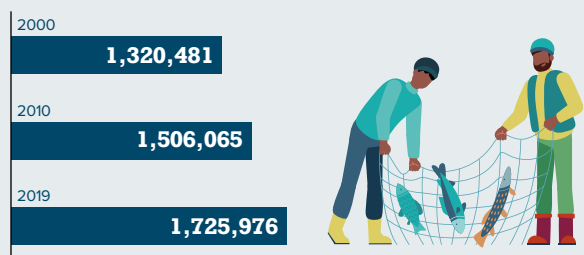
kg/per capita



Source: FAO State of World Fisheries and Aquaculture 2020, Bangladesh GLOBEFISH Market Profile 2018

### Number of fishers

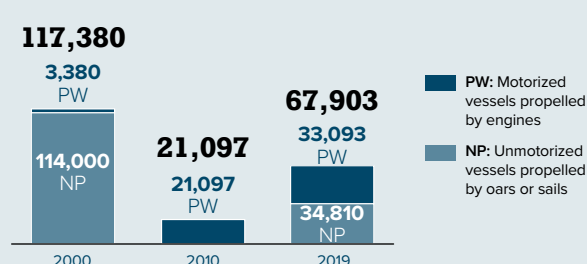
(estimates)



Source: FAO Fishery and Aquaculture Statistics 2019 (published in 2021)

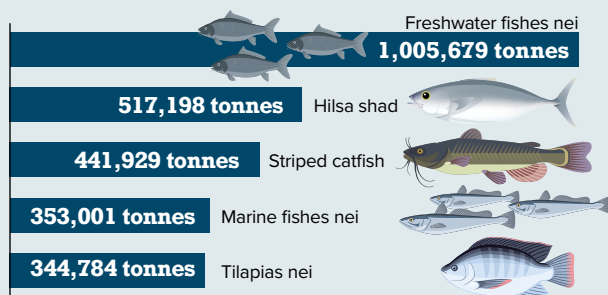
### Number of fishing vessels

(estimates)



Source: FAO Fishery and Aquaculture Statistics 2019 (published in 2021)

### Top 5 species



Source: Bangladesh GLOBEFISH Market Profile 2018 (by production volume)

### Export of fish and fish products

Bangladesh is the **48<sup>th</sup>** (estimate) **largest exporter** of fish and fish products in the world.




Source: FAO Fishery and Aquaculture Statistics 2019 (published in 2021)

<sup>9</sup> This information reflects international statistics (e.g. from the United Nations FAO), which in some cases may differ from national statistics. Furthermore, this report does not state the contribution of Bangladesh's fisheries sector to the national Gross Domestic Product (GDP). Although this is a common way of expressing the economic value of fisheries, GDP is not sufficient for fully representing the overall social, economic and environmental costs and benefits of the sector.

# KEY FINDINGS

## PUBLIC ACCESS TO FISHERIES INFORMATION

**!** This assessment shows that Bangladesh national authorities place certain efforts on publishing fisheries management information online. However, there is a significant amount of information that is not publicly accessible, and the quality of what is available online often requires improvement.



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For **18 out of 32** applicable transparency elements, Bangladesh's national authorities publish information online ('Public Access'), although with varying quality.

For **10** transparency elements there is no information published.

For **4** transparency elements no information has yet been produced by Bangladesh's national authorities.

### Not produced

Information for 4 transparency elements has **not been collected** or **compiled yet**.

### Strong public access

Information for 1 transparency element is **available online**, **up to date** and **easy to find**.

### Moderate public access

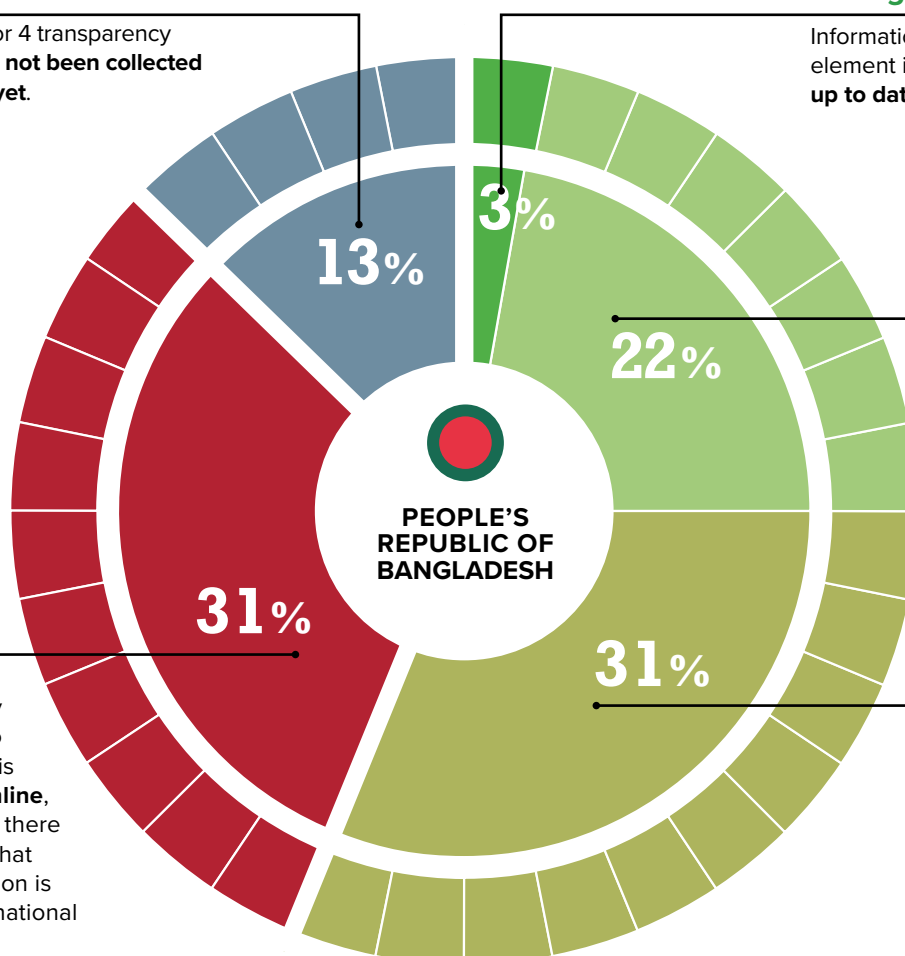
Information for 7 transparency elements is mostly available online, but is **only partially up to date** or **easy to find**.

### Weak public access

Information for 10 transparency elements is only partially available online, and **is also neither fully up to date nor easy to find**.










### No public access

For 10 transparency elements, **no information** is published **online**, even though there is evidence that this information is available to national authorities.










6 of the 38 transparency elements are considered as **not applicable** to Bangladesh's marine fisheries sector (see [Annex](#)).





## Detailed overview

			  			
Thematic area	ID	Transparency element	AVAILABLE ONLINE?	UP TO DATE?	EASY TO FIND?	
<b>#1</b>  <b>Fisheries Laws, Regulations and Official Policy Documents</b>	1-A	Laws on marine fisheries				Moderate public access
	1-B	Fisheries policy documents				Weak public access
	1-C	Fisheries management plans				Weak public access
<b>#2</b>  <b>Fisheries Tenure Arrangements</b>	2-A	Commercial fishing (large-scale and small-scale)				Moderate public access
	2-B	Coastal subsistence fishing				Not applicable
	2-C	Scientific and exploratory fishing				Weak public access
	2-D	Sport fishing				Not applicable
<b>#3</b>  <b>Foreign Fishing Access Agreements</b>	3-A	Foreign-flagged vessels fishing in Bangladesh waters				Not applicable
	3-B	Bangladesh-flagged vessels fishing in foreign waters				Not applicable
<b>#4</b>  <b>The State of the Fisheries Resources</b>	4-A	National reports on the state of marine fish populations				Not produced
	4-B	Scientific stock assessments				No public access
<b>#5</b>  <b>Large-Scale Fisheries</b>	5-A	Vessels				Weak public access
	5-B	Payments				No public access
	5-C	Catches within Bangladesh waters				Moderate public access
	5-D	Catches outside Bangladesh waters				Not applicable
	5-E	Landings in Bangladesh ports				No public access
	5-F	Transshipments and landings in foreign ports				Not applicable
	5-G	Discards				No public access
	5-H	Fishing effort				Weak public access

To a full extent
 To a large extent
 To a limited extent
 No
 Not produced
 Not applicable

## Detailed overview

Thematic area	ID	Transparency element	AVAILABLE ONLINE?	UP TO DATE?	EASY TO FIND?	
 <b>Small-Scale Fisheries</b>	6-A	Vessels	✓	✗	✗	Weak public access
	6-B	Licenses	✓	✓	✓	Moderate public access
	6-C	Fishers	✓	✓	✓	Moderate public access
	6-D	Payments	✓	✓	✓	Moderate public access
	6-E	Catches	✓	✓	✗	Moderate public access
	6-F	Discards	⚪	⚪	⚪	Not produced
 <b>Post-Harvest Sector and Fish Trade</b>	7-A	Imports	✓	✓	✗	Weak public access
	7-B	Exports	✓	✓	✗	Weak public access
	7-C	Employment in commercial fisheries	✗	—	—	No public access
	7-D	Employment in informal fisheries	✗	—	—	No public access
 <b>Fisheries Law Enforcement</b>	8-A	Enforcement of laws	✓	✓	✓	Weak public access
	8-B	Sanctions for major offences	✗	—	—	No public access
 <b>Labour Standards</b>	9-A	Enforcement of labour standards	✗	—	—	No public access
	9-B	Sanctions for labour standard offences	✗	—	—	No public access
 <b>Fisheries Subsidies</b>	10-A	Government financial transfers or subsidies	✗	—	—	No public access
 <b>Official Development Assistance</b>	11-A	Public sector development projects	✓	✓	✓	Weak public access
 <b>Beneficial Ownership</b>	12-A	Legal basis for beneficial ownership transparency	✓	✓	✓	Strong public access
	12-B	Beneficial ownership registry	⚪	⚪	⚪	Not produced
	12-C	Beneficial ownership disclosure in fisheries	⚪	⚪	⚪	Not produced

 To a full extent
  To a large extent
  To a limited extent
  No
  Not produced
  Not applicable



## GIVING MEANING TO TRANSPARENCY: NOTABLE EXAMPLES

The value of this TAKING STOCK assessment does not only lie in understanding what information on a country's marine fisheries is available online, and where gaps exist. Fundamentally, and in very simple terms, **public access to fisheries information is important to help answer critical questions about the sustainability of the sector.**

### Examples

Who manages our fisheries?

Are our fisheries being sustainably managed?

What is the contribution of marine fisheries to our national food security?

How much does my country earn from our fisheries resources?

Who catches our fish?

What is the value of fisheries to our national economy?

How is my country dealing with illegal, unreported and unregulated fishing?

How well is the government protecting the rights of people working in the fisheries sector?



**Government**

**Fishers**  
(Industrial and artisanal)

**Media**

**Parliamentarians**

**Civil Society Organisations**

**Academia**

Given the complexity of fisheries management, answering such questions is not always a straightforward task. However, by increasing public access to fisheries information, governments provide their citizens and businesses the necessary means to engage in informed public debates.

Bangladesh's national authorities proactively disclose fisheries information that supports public understanding and appreciation of the sector and helps to answer important questions. Notable examples include:

✓	<b>How is Bangladesh's fisheries sector managed?</b>	The Department of Fisheries provides accessible Annual Reports of its fisheries management endeavours, including important updates of policy developments and legislative changes in Bangladesh, as well as notable projects.
✓	<b>Who is fishing in Bangladesh's waters?</b>	A list of large-scale vessels authorised to apply for fishing licenses is maintained by the Mercantile Marine Office (MMO) of Bangladesh, a department of the Ministry for Shipping. The list is updated on a regular basis.
✓	<b>How much fish is caught in Bangladesh's waters?</b>	Data for catches within Bangladesh waters (by large-scale as well as small-scale fisheries) is published online, e.g. in the Yearbook of Fisheries Statistics of Bangladesh, including disaggregated information by species group and fishing gear.

For several important aspects of Bangladesh's fisheries sector, no information exists at all, as nothing has yet been collected or compiled. This clearly impedes the government's ability to manage fisheries sustainably, as well as stakeholders' ability to better understand their fisheries sector.

However, it is acknowledged that this may be because Bangladesh's national authorities are targeting different priorities or simply do not have the technical, financial or human resources needed to produce such information. Notable examples include:<sup>10</sup>

⊘	<b>How healthy are Bangladesh's fish stocks?</b>	Despite 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, the government of Bangladesh does not provide any regular reports on the health of marine biodiversity.
⊘	<b>How inclusive is the decision-making process in Bangladesh's fisheries?</b>	No formal mechanisms for external oversight and public consultations have been produced yet by Bangladesh's national authorities, failing to address the role of parliament, the High Court and the Citizen's Engagement Forum in the participatory governance of the sector.
⊘	<b>Who benefits from Bangladesh's fisheries?</b>	No information was found whether Bangladesh's national authorities are working to produce dedicated rules and procedures to incorporate beneficial ownership into filings that regulate access to fisheries, nor to compile a register of the operators or beneficial owners of vessels flying Bangladesh's flag.

<sup>10</sup> Countries that implement the FiTI follow its core principle of 'progressive improvement', which states that countries are not expected 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.

**Bangladesh's national authorities do not currently publish information on several key areas of sustainable fisheries management online, even though there is evidence that this information is available to national authorities. Notable examples include:<sup>11</sup>**

✗	<b>Who is working in Bangladesh's fisheries sector, and under what conditions?</b>	There is no government information published online that provides an estimate on employment (formal and informal) in the fisheries sector, including small-scale fisheries, marine harvest and post-harvest sub-sectors. Official statistics are also often not disaggregated by gender, failing to recognise the important contributions of women in the sector.  In addition, no information about national strategies and activities for enforcing labour standards in Bangladesh's marine fisheries sector is available online.
✗	<b>How is the government supporting Bangladesh's fisheries sector?</b>	Bangladesh's government provides multiple forms of direct and indirect subsidies to its marine fisheries sector, including a Value Added Tax rebate on fuel, or a food assistance programme aimed at supporting artisanal fishers as compensation for temporary fisheries closures. Yet, no such information is published online.
✗	<b>How much does Bangladesh earn from granting fishing licenses?</b>	Information on revenues received from authorising large-scale vessels to fish in Bangladesh's waters has not been published by national authorities, even though such payments are required under the country's Marine Fisheries Act of 2020.



<sup>11</sup> It is possible that such information is published by national authorities online, but this assessment was unable to locate it, mainly due to the challenges of searching through government websites.

# A DEEP DIVE INTO PUBLIC ACCESS TO FISHERIES INFORMATION



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Additional important insights can be gained by understanding whether the published government information ('Public access') meets basic information requirements, is up to date and easy to find.



**AVAILABLE  
ONLINE?**



**UP TO DATE?**



**EASY TO FIND?**



## AVAILABLE ONLINE?

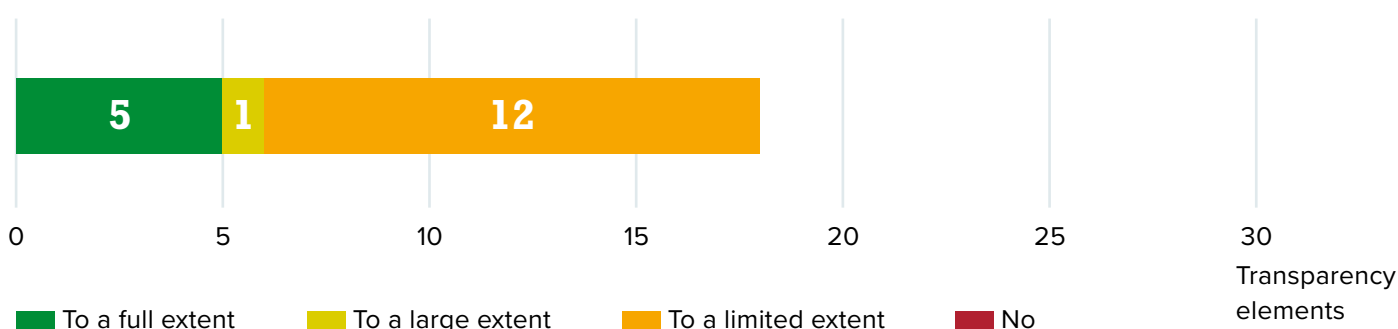
### AVAILABLE ONLINE?



Bangladesh's national authorities publish information for 18 out of 28 applicable transparency elements (i.e 'Public access').<sup>12</sup> Of those 18 elements, only around one quarter (or 28%) fully meet the information requirements of the FiTI Standard.

A DEEP DIVE INTO  
PUBLIC ACCESS TO  
FISHERIES INFORMATION

*Is information in accordance with the FiTI Standard available online?*



The Department of Fisheries (DoF) of Bangladesh proactively publishes online many of its flagship documents. These documents – which include its **Annual Reports** as well as its **Yearbook of Fisheries Statistics** – contain extensive amounts of important, and often detailed information which shines a light on a wide range of different aspects of Bangladesh's marine fisheries sector. For example, an overview of national law enforcement activities and strategies and information on public sector development projects in the fisheries sector is provided through the DoF's Annual Reports; the statistical yearbooks are providing granular data on vessel numbers and annual catches of the artisanal marine fisheries fleet.

Putting information online via such means is considered an effective catalyst for nurturing transparency across the sector, even though the publication of both documents has in recent years suffered from delays (see next chapter 'Up to date?').

<sup>12</sup> From a total of 38 transparency elements, this assessment considers six as being 'Not applicable' to Bangladesh's marine fisheries sector, whereas another four elements are considered as 'Not produced' (meaning the government has not collected or compiled the information requested under these elements).

A recently-established **Management Information System (MIS)** specifically focusing on Bangladesh fisheries represents another useful online tool promoting public access to fisheries information. Users require a username and password to login to the MIS – although both are currently presented on its webpage – so the system remains open for anyone to access for now. Information available through the MIS includes a database of registered fishers as well as data related to catches in Bangladesh's water displayed over a map of the country. Gaps in information points to the MIS still being under construction, yet this online system has the potential to develop into an important resource for improving transparency in marine fisheries in Bangladesh. This potential, however, would be stifled if the MIS – once completed – restricts user access, for example, to authorised government personnel or via a paywall.

On the other hand, there are several examples where information published online by the Bangladesh government does not meet the basic requirements of the FiTI Standard.

The DoF's Annual Reports (as well as other non-government sources) refer to several important **policy documents** developed by the DoF which are not available online, such as the:

- National Fisheries Policy of 2018;
- National Plan of Action for Sharks;
- Strategic Action Plan of the Bay of Bengal Large Marine Ecosystem.

Additionally, none of the policy documents that the DoF publishes online are accompanied by explanatory text, making it challenging to understand how these documents relate to each other.

An online **list of large-scale (industrial) vessels** authorised to fish in Bangladesh's waters represents another area of published information falling short of the basic information requirements of the FiTI Standard. While the online availability of this list – maintained by the Mercantile Marine Office (MMO) of Bangladesh – is an important way to support public understanding of the actors allowed to fish in Bangladesh's water, the list is missing most of the defining characteristics of vessels detailed in the FiTI Standard. For example, information on vessel ownership is only available for certain vessels, even though Bangladesh's Marine Fisheries Act of 2020 stipulates that licence application must include evidence of a vessel's owner.

Likewise, there is a notable absence of information in the public domain on the extent of **scientific and exploratory fishing** in Bangladesh, even though 39 such licenses were issued for so-called 'trial trips' in 2020. For example, the Marine Fisheries Act – the main piece of legislation for tenure arrangements in Bangladesh – does not state whether fees are charged for issuing scientific and exploratory fishing licenses. Ambiguities also exist with regards to the authorities/persons that are legally entitled to issue licenses as well as the mandatory administrative procedures required to determine their issue.



Meanwhile, no **stock assessments** of marine fish species are published on any government website, despite a reference in the DoF's 2018 Annual Report to an FAO-funded project entitled 'Technical Support for Stock Assessment of Marine Fisheries in Bangladesh'. Given that the government of Bangladesh has put out several statements recognising the considerable issue of declining populations of its marine fish species – as well as substantial changes to marine fish ecology (both caused by a combination of unsustainable fishing, pollution and habitat change) – it is critical that such information is made publicly available.<sup>13</sup>

Published **trade statistics on fish and fish products** fall under general categories, making it impossible to access precise figures that relate to imports and exports of marine fish products, as well as fish products that are derived from farms as opposed to the sea. Additionally, while the DoF's Yearbook of Fisheries Statistics covers important **catch data from Bangladesh's large-scale (industrial) fisheries**, nearly 75% of all fish caught is classified under 'other'. With such large proportions of the data on fish species unspecified and vague, its information value is severely diminished.



<sup>13</sup> This assessment recognizes that certain academic journals do publish information on stock assessments of Bangladesh's marine fish species. These have either been derived from government-collated data or data generated from primary research among artisanal fisher communities. This includes, for example, articles published in the Journal of Bangladesh Fisheries Research, a peer-reviewed journal managed by the Bangladesh Fisheries Research Institute. However, all of these articles are considered highly technical and consequently difficult for the layperson to locate and interpret.

## UP TO DATE?

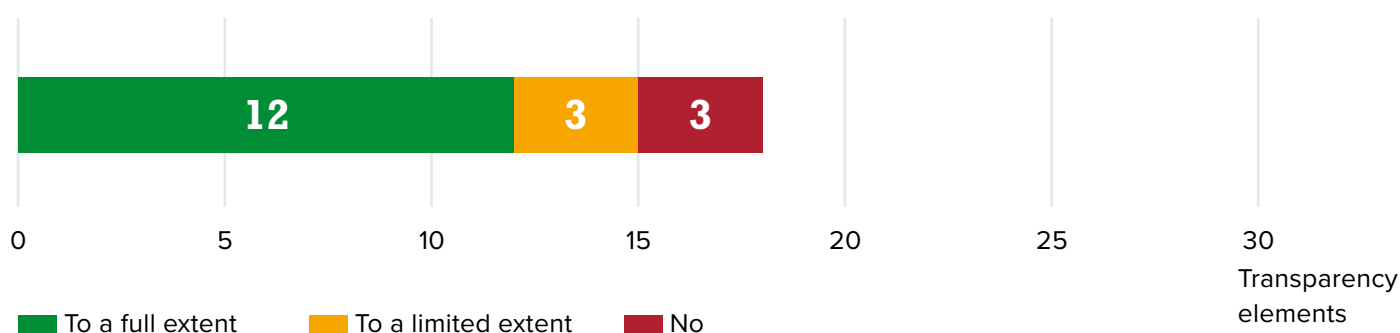
### UP TO DATE?



**Information published online is considered to be fully up to date for 12 of the 18 transparency requirements (or 67%).**

Fish is a renewable resource that can, if sustainably managed, remain accessible and beneficial for generations. Those making decisions affecting fisheries must be able to have quick and easy access to the latest available data. The importance of up-to-date information takes on an even greater dimension when it comes to time-sensitive issues such as the production of catch data or scientific stock assessments.

*Is the published information provided in a timely, up-to-date manner?*



A number of notable examples have been identified where Bangladesh's national authorities publish up-to-date information, such as its [list of large-scale/industrial vessels](#) authorised to apply for fishing licences. This list is maintained by the Mercantile Marine Office (MMO) of Bangladesh and is updated on a regular basis (last update June 2021).

Government data available online on [imports and exports](#) is also seen as up to date (although remains highly aggregated).

However, issues have arisen over recent years in the timely online publication of important fisheries documents. For example, the latest version of the DoF's **Annual Report** – a significant document covering national fisheries management strategies and activities – is for the year 2018, but was only uploaded to their website in July 2020. Similarly, there have been delays in the publication of the DoF's **Yearbook of Fisheries Statistics of Bangladesh**. This clearly limits the contributions of government information towards sustainable fisheries management and oversight. However, some delays can likely be attributed to the **COVID-19 pandemic**, as historical records show that Bangladesh's authorities usually publish data on a more punctual basis. Due to this force majeure, a degree of flexibility for overdue government reports was factored into this assessment.

Other opportunities exist for the national authorities of Bangladesh to continue improving the timely sharing of information on the country's marine fisheries sector. For example, each year the government prepares detailed annual reports on Bangladesh's commercial fisheries for submission to the **Indian Ocean Tuna Commission (IOTC)**. Though they are featured on the IOTC website, the DoF does not publish any of these reports on its own website, thereby restricting public access – particularly of its own citizens who are likely less aware of the IOTC than international stakeholders. The value of the reports is also called into question as their wording has remained identical over several years (the text 'copy and pasted' from the original report).

The number of **fishing vessels in Bangladesh's small-scale sector** stands out as another example of outdated information, with the same figures presented today as for the 2015-16 fishing season, suggesting that government data has not been updated since then.

It is also unclear whether all **fisheries management plans** published by the government (such as the industrial fisheries management plan) are up to date, as plans could only be found online in their draft forms.



## EASY TO FIND?

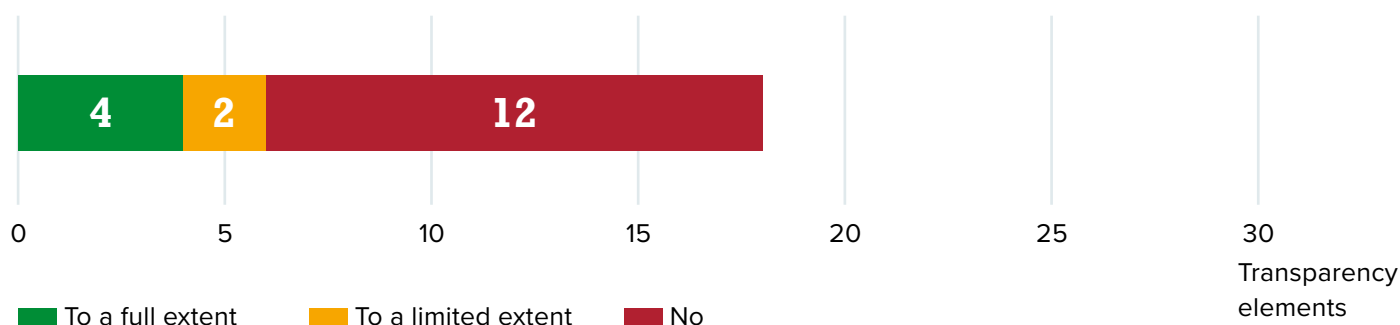
### EASY TO FIND?



Information published online by the Bangladesh government is generally difficult to locate, as information for only 4 out of 18 transparency elements (or 22%) can be easily found by a layperson.<sup>14</sup>

Governments have the responsibility to manage fisheries on behalf of their citizens – and inform them about the current status, opportunities and challenges facing the sector. In the digital age, websites remain one of the most popular mediums to convey such information. However, websites are passive communications channels, and stakeholders have to purposely visit the site, search for the desired content and navigate to find information. If this is difficult or time consuming, stakeholders may lose interest, leaving potentially important information unread and underutilised.

*Is the published information easy to find on a government website from a non-expert point of view?*



The government of Bangladesh is committed to transparency and open government, a position communicated via multiple policy documents and pieces of legislation. This includes, for example, the programme **Digital Bangladesh 2021** (launched in 2009), which outlines objectives to transform the country's Information Communication Technology (ICT) infrastructure in order to enhance democracy and bolster economic growth. The path to implement this programme was laid out in the **National ICT Policy of 2009**, which – relevant for this assessment – targets improvements in the online availability of and public access to government information.

<sup>14</sup> This assessment analysed how easy or difficult it is for a layperson to find information about Bangladesh's marine fisheries sector, instead of stakeholders with a background in fisheries and therefore holding a unique advantage in their capacity to locate the information.

In 2014, as part of its commitment to implement the National ICT Policy, the government established a **central portal of government information** ([www.bangladesh.gov.bd](http://www.bangladesh.gov.bd)). All government ministries subsequently migrated information from their previous websites to the new centralised portal.<sup>15</sup>

Given the importance the government of Bangladesh places on consolidating information into a central location, this portal stands out as an intuitive starting point for finding fisheries-related information. However, **several challenges** were encountered during this assessment when using the portal to locate specific fisheries-related information:<sup>16</sup>

- The homepage of the central portal provides links to the websites of the Ministry of Fisheries and Livestock (MoFL) and the Department of Fisheries (DoF). As these websites both publish fisheries information, it is often unclear which should be considered the primary, comprehensive source to consult. Considerable overlaps are evident in the information provided on the two websites, but – confusingly – there are also striking differences between them. For example, both websites include sub-pages which list information on fisheries laws, rules and policies, but the list found on the MoFL page has links to documents that do not appear on the equivalent page of the DoF.
- Both the MoFL and DoF websites contain numerous sub-pages featuring links that are either not functional, or redirect users to websites that are no longer maintained. Information on the two websites is also often incomplete. For example, the sub-page of the DoF's Marine Fisheries Survey Management Unit – responsible for managing scientific research on fish populations and publishing findings – is currently very sparsely populated.
- Fisheries-related information is sometimes scattered across various websites, with no reference or link back to the webpages of the MoFL or DoF. For example, the website of the Mercantile Marine Office of Bangladesh hosts the vessel registry, while reports on fisheries trade data can only be found on the website of the Ministry of Commerce. Though it is not expected for the MoFL or DoF websites to act as an exhaustive sources for every single piece of fisheries-related information, simple links to websites of other national authorities can significantly expedite the process of locating information, especially for the layperson.
- Certain information is published on the central portal with no apparent link or navigational path to actually access it. For example, the portal makes no explicit mention of the National Plan of Action to Prevent, Deter and Eliminate IUU (2019). However, the plan is indeed available, but can only be found by using an external search engine (like Google). While using such search engines is a common way of locating information online nowadays, stakeholders less familiar with the sector – such as the media or parliamentarians – might not even be aware of the existence of such information, and will therefore be unable to conduct targeted searches.

<sup>15</sup> For more information on the digital landscape of Bangladesh's marine fisheries sector, please refer to the Detailed Assessment Report.

<sup>16</sup> In addition to accessing information through the central government portal, this assessment located significant information by directly accessing websites of national authorities, as well as by utilising external search engines, such as Google.



Overall, while the authorities responsible for managing fisheries in Bangladesh value and utilise their various websites for information sharing purposes, there are significant opportunities for improvements. **Improving access to information in the fisheries sector** is also described as a specific activity targeted by the ongoing World Bank-financed 'Bangladesh Sustainable Marine and Coastal Fisheries' project, one of the largest marine fisheries projects in the world at present.

Although this assessment concludes that fisheries information published online by the government of Bangladesh is often challenging to find, it equally recognises that the government shares information via several other **non-digital means**. The DoF coordinates extensive awareness campaigns among fishing communities on key government policies, such as seasonal bans on hilsa fisheries. This includes Jatka Conservation Week and Fish Week, 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 summarises these campaigns in its Annual Reports. Such sensitisation efforts are critical in a country with high levels of illiteracy.





## 'GOOD TRANSPARENCY PRACTICES'



Notably, Bangladesh's national authorities publish certain information on the country's fisheries sector in a way the FiTI considers as **'good transparency practice'**.

Commonly, transparency for sustainable fisheries management is defined narrowly as the act of publishing complete, timely and easy-to-find information. However, it is equally important to publish information in a way that allows non-experts to understand and draw conclusions from it. There are several positive examples in Bangladesh:



### Highlights:

- An online Management Information System (MIS) for fisheries, including a database on registered fishers, as well as data on total fish catches displayed on a map of Bangladesh.<sup>17</sup>
- Annual Reports, published by the Department of Fisheries, containing detailed and important information on many aspects of the fisheries sector of Bangladesh, such as strategic objectives, fisheries policies, financial data, current projects, as well as awareness campaigns.



Finally, this assessment indicates that Bangladesh's national authorities offer only limited features to ensure that published information can be freely used (e.g. via search and filter functions), re-used and redistributed by anyone.

For example, the vessel registry published by the Mercantile Marine Office (MMO) of Bangladesh only lists fishing vessels on its website, without any possibility of downloading, filtering or searching.

Similarly, the Management Information System (MIS) currently just displays information on the website, without features to search or filter.

Furthermore, no information was found indicating whether fisheries-related data provided by Bangladesh's national authorities is released under an open and unrestricted license, such as those developed by Creative Commons.<sup>18</sup>

It is worth highlighting that most of the fisheries management information published on government websites is available in both Bangla and in English.

<sup>17</sup> Presently, the information on this website seems incomplete and it is assumed that this website is still under construction. Furthermore, this portal requires a username and password, although both are presented on its webpage, so it is currently open for anyone to access. It is hoped that, once completed, this portal will remain open for public access.

<sup>18</sup> Licenses should be published and linked to open data to ensure users can easily find and understand the conditions of data access and reuse. For more information, please refer to: <https://opendatacommons.org/licenses/>



# RECOMMENDATIONS FOR NATIONAL AUTHORITIES OF BANGLADESH

Bangladesh's national authorities already provide certain information on the country's marine fisheries sector online. Nevertheless, there are several ways in which transparency in Bangladesh's fisheries can be strengthened:

## 1. Make currently unpublished information publicly available

There are several areas of fisheries management where government information is currently not published online. Publishing such information would raise levels of transparency and trust in national fisheries authorities. This includes e.g.:

- Scientific research into marine fish populations (e.g. stock assessments);
- Government revenues for issuing fishing licenses;
- Information on the enforcement of labour standards in the fisheries sector;
- Information on government financial transfers or subsidies for increasing the capacity of the industrial fishing sector to target migratory fish species, including tuna;
- Reports relating to the implementation and outcomes of projects financed by international partners, including the FAO and the World Bank.

Likewise, it is important to clearly state if certain areas of fisheries management are simply not relevant for Bangladesh's fisheries sector. For example, there is currently no clear indication of whether or not foreign-flagged vessels are authorised to fish in Bangladesh's national waters, including for highly migratory fish species, through foreign fishing access agreements.

## 2. Recognise ongoing efforts

References to several activities being undertaken by Bangladesh's national authorities were found online, but it remains unclear whether such activities are still ongoing, are completed or have been cancelled. This relates in particular to the development of new policy documents, such as a National Plan of Action for Sharks. Clearly detailing the status of such activities via progress reports increases the accountability of and appreciation for the government's efforts to ensure a sustainable marine fisheries sector.

### 3. Address information gaps

Although Bangladesh's national authorities collate substantial information on fisheries, there are important areas within the sector where government information is notably absent, likely due to insufficient research capabilities or resources allocated for data collection. Gaps in information exist on issues such as:

- The social and economic contribution of marine fisheries, including the contribution of artisanal fisheries to livelihoods and food security;
- Discards from various fisheries sectors;
- Rules and procedures for addressing beneficial ownership transparency in Bangladesh's marine fisheries sector.

The Ministry of Fisheries and Livestock (MoFL) is encouraged to partner with other government agencies, donors and stakeholders to collect and compile such information. For example, the MoFL could partner with the Bureau of Statistics to ensure fisheries is clearly represented in national labour surveys.

### 4. Ensure that information can be easily found in the central government portal

The central government portal represents a positive country-wide effort to strengthen transparency. However, the current way in which government data is organised and presented makes it difficult to find.

In practical terms, this could be improved by e.g.:

- Creating a main landing page for fisheries information, with categories for key information available through a menu system;<sup>19</sup>
- Avoiding the duplication of information on various websites (e.g. MoFL and DoF);
- Providing clear links to fisheries-related information held by other national authorities, such as the vessel registry of the Mercantile Marine Office of Bangladesh;
- Reviewing and updating document repositories, such as laws, policies and fisheries projects;
- Fixing broken hyperlinks.

<sup>19</sup> The 12 thematic areas of the FiTI Standard could serve as such a high-level menu structure.

## 5 ■ Strengthen the comprehensibility of data in order to stimulate public debates

Fisheries data must serve multiple purposes. This ranges from very detailed, granular data sets (e.g. for statistical analysis) to visualisations of high-level aggregated information (e.g. for obtaining a general overview of the health of Bangladesh's marine fish stocks). Currently, important information is often buried in long and technical reports, mainly intended for use by fisheries experts. Complementing such reports with aggregated, 'easier to understand' information can significantly improve public understanding and appreciation of the country's fisheries sector.

In practical terms, this could be attained by e.g.:

- Providing a summary description of tenure arrangements;
- Publishing information briefs that offer insight into the development of community co-management of fisheries and priority issues, such as labour standards applicable to the fisheries sector;
- Continuing with the regular publication of an Annual Report, covering all relevant aspects of marine fisheries (as defined e.g. by the FiTI Standard);
- Utilising data visualisation methods, e.g. as part of the Management Information System.

Strengthening transparency within Bangladesh's marine fisheries sector by, inter alia, reviewing and prioritising these recommendations, should be based on ongoing discussions with stakeholders, such as fishers, fishing companies, civil society and academia (e.g. as part of the new Citizen's Engagement Forum). This may further help to identify other important information gaps on national priorities, which have not been covered under this assessment (such as the impacts of climate change or the interactions between fisheries and other sectors in the blue economy).



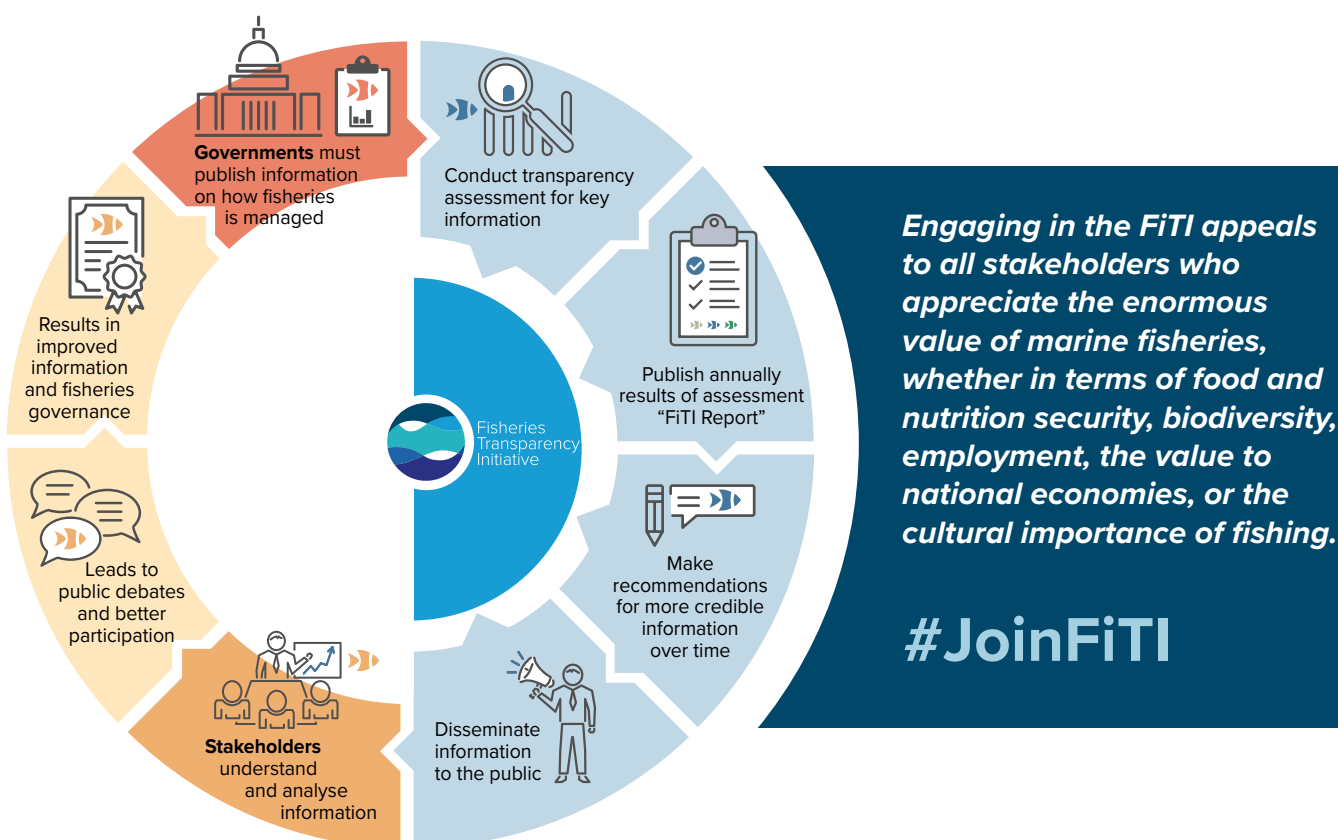
# TRANSPARENCY NEEDS TRUST

Public access to information on how Bangladesh's marine fisheries sector is being exploited is fundamental for good governance. This TAKING STOCK assessment provides a sound starting point for national authorities in Bangladesh to enhance and maintain high levels of transparency in marine fisheries management. But it does not tell the whole story: challenges still exist that are unlikely to be overcome by a single actor working alone. Such challenges involve determining whether information that is not published online simply does not exist, or whether information that is disclosed is perceived as credible by stakeholders. Addressing such challenges requires a comprehensive and inclusive approach.

**Therefore, a collective effort is needed from all relevant stakeholders to incorporate a variety of perspectives and enhance transparency and trust over time.**

The Fisheries Transparency Initiative (FiTI) provides such a unique combination of transparency and participation. The FiTI is implemented in countries through National Multi-Stakeholder Groups, consisting of representatives from government, business and organised civil society. These groups work collectively to:

- » assess the information in the public domain against the FiTI Standard;
- » make recommendations on how to prioritise the closure of information gaps; and
- » provide suggestions on how information published by national authorities can be strengthened to further raise levels of openness and public access to information.



## ANNEX: ASSESSMENT PROCEDURES

This TAKING STOCK assessment evaluates the disclosure practices of Bangladesh's national authorities across 12 thematic areas of **marine fisheries management**,<sup>20</sup> as defined by the FiTI Standard.

In order to avoid ambiguities during the assessment, these 12 thematic areas have been further broken down into **38 transparency elements**. For example, thematic area #1 'Fisheries Laws, Regulations and Official Policy Documents' is broken down into three transparency elements.

The assessment is focused entirely on the availability of information<sup>21</sup> provided by Bangladesh's national authorities through their own websites and online publications.

Within the scope of this assessment, three different entry points have been utilised to evaluate whether information on Bangladesh's marine fisheries sector is published online by national authorities:<sup>22</sup>

- Through the central government portal ([www.bangladesh.gov.bd](http://www.bangladesh.gov.bd));
- By directly accessing websites of national authorities (e.g. Department of Fisheries);<sup>23</sup>
- By utilising external search engines, such as Google.

The assessment was conducted as a **desktop study** without relying on initial input or contributions from national authorities.

This assessment, the first for Bangladesh, does not only seek to provide an overview of what the government publishes regarding a number of key areas of its marine fisheries sector. It also intends to provide a sound basis of information to spark interest among various governmental and non-governmental stakeholders.

The assessment does **not** try to capture and display the actual underlying information behind each transparency element (e.g. number of vessels), nor does it undertake an independent verification of whether information disclosed online by national authorities is complete or correct. Nevertheless, if compelling evidence of unreliable or contradicting information has been found, it is noted in the Detailed Assessment Report.

The assessment was conducted over a period of 6 months (July – December 2021). The process was officially launched on 24 June 2021 when the Ministry of Fisheries and Livestock was informed about the upcoming assessment, its key parameters and benefits.

**The Ministry of Fisheries and Livestock of Bangladesh was invited to provide feedback on the findings of the assessment's initial research phase over a period of eight weeks. No comments were received prior to the deadline. Therefore, the report was finalised without government input.**

The overall assessment process was conducted under the supervision and responsibility of the FiTI International Secretariat, with significant input from researchers and reviewers.

20 Information on inland fisheries and aquaculture does not form part of this assessment.

21 Kindly note that in the context of this assessment, the terms 'data' and 'information' are used interchangeably. It is acknowledged that while closely intertwined, they differ in meaning and usage (e.g. data is the raw fact, which should be processed to gain information). However, this difference is not of major relevance for this assessment.

22 Information is only considered available online if it is proactively published on a government website and is available without access restrictions (e.g. the need to register online, request the data from a civil servant via email or pay a fee).

23 Either embedded within the central government portal, or as a 'standalone' website.



As part of this TAKING STOCK assessment, several transparency requirements are considered as not applicable for Bangladesh's marine fisheries, such as:

—	<b>Coastal subsistence fishing</b>	No distinction is provided in Bangladesh's fisheries laws between commercial artisanal fishing and subsistence fishing (i.e. fishing for personal consumption only). Although it is recognised that 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.
—	<b>Sport fishing</b>	Bangladesh's fisheries laws do not recognise recreational or sport fishing. In reports to the Indian Ocean Tuna Commission (IOTC), the government has stated that this type of fishing does not occur in its marine waters. Consequently, there is no legal framework to manage this sector or regulate access to fisheries at present. However, a small business sector markets marine fishing for tourism and there has been interest in developing the sector further.
—	<b>Foreign fishing access agreements</b>	There is no evidence that foreign-flagged fishing vessels operate in Bangladesh under an access agreement. However, foreign-flagged vessels can apply directly for a fishing license at the Department of Fisheries.  Also, there is no evidence that Bangladesh has foreign fishing access agreements with other countries to allow Bangladesh-flagged vessels to fish in their waters.
—	<b>Operations outside Bangladesh's waters</b>	As there is no clear evidence that Bangladesh-flagged vessel operate outside the country's jurisdictional waters, information on catches in foreign waters, transhipments and landings in foreign ports is seen as not applicable.





Fisheries  
Transparency  
Initiative

## TAKING STOCK

Online Transparency of Fisheries  
Management Information



2021

Summary Assessment Report

PEOPLE'S REPUBLIC  
OF BANGLADESH

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