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# INSTITUTIONAL ARCHITECTURE FOR FOOD SECURITY POLICY CHANGE: BANGLADESH

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# INSTITUTIONAL ARCHITECTURE FOR FOOD SECURITY POLICY CHANGE: BANGLADESH

Enabling Agricultural Trade (EAT) project

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## ACRONYMS

ADAB	-	Association of Development Agencies in Bangladesh
ADP	-	Annual Development Programme
AEU	-	Aid Effectiveness Unit
AE-WG	-	Aid Effectiveness Working Group
ARDFS-WG	-	Agriculture, Rural Development and Food Security Working Group
APSU	-	Agricultural Policy Support Unit
BAPA	-	Bangladesh Agro-Processor's Association
BARC	-	Bangladesh Agricultural Research Council
BBS	-	Bangladesh Bureau of Statistics
BCSNPN	-	Bangladesh Civil Society Network for Promoting Nutrition
BFS	-	Bureau for Food Security
BIDS	-	Bangladesh Institute for Development Studies
CIG	-	Common Interest Groups
CIP	-	Country Investment Plan
CSO	-	Civil Society Organizations
DAE	-	Department of Agricultural Extension
DAM	-	Department of Agricultural Marketing
DP	-	Development Partners
ERD	-	Economic Relations Division
FAO	-	Food and Agriculture Organization
FBCCI	-	Federation of Bangladesh Chambers of Commerce and Industry
FPMC	-	Food Planning and Monitoring Committee
FPMU	-	Food Planning and Monitoring Unit
FPWG	-	Food Policy Working Group
FSNSP	-	Food Security Nutritional Surveillance Project
GDP	-	Gross Domestic Product
IDS	-	Institute of Development Studies
IEH	-	Instituto de Estudios contra el Hambre
IFPRI	-	International Food Policy Research Institute

IMICC	-	Inter-Ministerial Implementation Coordination Committee (IMICC)
IMIC	-	Inter-Ministerial Implementation Committee
JCS	-	Joint Cooperation Strategy
LCG	-	Local Consultative Group
GAFSP	-	Global Agriculture & Food Security Program
GNCC	-	Government-NGO Consultative Council
MFL	-	Ministry of Fisheries and Livestock
MLJP	-	Ministry of Law, Justice, and Parliamentary Affairs
MOA	-	Ministry of Agriculture
MOF	-	Ministry of Food
MOFL	-	Ministry of Fishery and Livestock
MOL	-	Ministry of Land
MPAD	-	Master Plan for Agricultural Development
MTBF	-	Medium Term Budgetary Framework
MWR	-	Ministry of Water Resources
NAP	-	National Agricultural Policy
NARS	-	National Agricultural Research System
NATP	-	National Agricultural Technology Project
NFP	-	National Food Policy
NFPCSP	-	National Food Policy Capacity Strengthening Programme
NFP-POA	-	National Food Policy Plan of Action
NGOAB	-	Non-Government Organizations Affairs Bureau
SRDI	-	Soil Resource Development Institute
SUN	-	Scaling Up Nutrition
USAID	-	United States Agency for International Development
WEAI	-	Women's Empowerment in Agriculture Index
WG-AFSRD	-	Working Group on Agriculture, Food Security, and Rural Development

## INTRODUCTION AND METHODOLOGY

The path and trajectory of policy change is a complex, non-linear process that is often unique to a particular country. While no two countries share precisely the same process, effective policy changes can and do share similar features: predictable, transparent, inclusive, and evidence-based policy-making. A core concern and commitment of partner countries is to establish an enabling environment for the implementation of national agricultural investment plans. In support of this goal and recognizing the critical importance of the quality of the policy change process, the United States Agency for International Development's (USAID) Bureau for Food Security (BFS) is emphasizing the need for an understanding of the Institutional Architecture for Food Security Policy Change.<sup>1</sup>

Institutional architecture provides a framework for analyzing a country's capacity to undertake food security policy change.<sup>2</sup> This is accomplished by identifying implementation barriers, designing policy options, and coordinating actions across public and private institutions. This assessment examines the components of the policy-making process, providing USAID, local policymakers, and other key stakeholders with information on possible constraints that could stymie effective policy change. This work will help inform USAID as it explores new approaches for technical assistance to improve the capacity and performance of the policy change process.

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### Part I: Overview of Institutional Architecture for Policy Change

The first part in this process maps out the key actors that influence food security policy development. This involves identifying and mapping the key institutions that hold primary responsibility for implementation; inter-ministerial coordination mechanisms; private and civil society organizations; as well as think tanks and research organizations that impact and influence the food security policy change process. These factors are examined in the context of the broader economic and social dynamics that impact the policy change environment.

### Part II: Capacity of Food Security Policy Change

The second part of this assessment involves an analysis of a country's capacity to undertake transparent, inclusive, predictable, and evidence-based policy change. The country is examined through the following six components of the policy formation process to determine its 'readiness for policy change':

- Policy Element 1: Guiding Policy Framework
- Policy Element 2: Policy Development and Coordination

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<sup>1</sup> Institutional architecture is defined as the set of partner-country procedures and processes for data collection and analysis, consultation and dialogue, policy proposal, feedback, approval, implementation, and enforcement.

<sup>2</sup> Food Security is defined by Feed the Future as "when all people at all times have access to safe and sufficient food to meet their dietary needs for a productive and healthy life. There are four main components: availability, accessibility, utilization, and stability of food."

- Policy Element 3: Inclusivity and Stakeholder Consultation
- Policy Element 4: Evidence-based Analysis
- Policy Element 5: Policy Implementation
- Policy Element 6: Mutual Accountability

Each of these components is analyzed through a set of indicators that determine the capacity and effectiveness of the overall policy change process. Each indicator is assessed using a three-tier rating system, which highlights the level of attention needed to improve the effectiveness of the component. A *green* rating means the component is realized to a sufficient degree, and additional attention is not required. A *yellow* rating means that the conditions required to achieve the component are partially achieved, but additional attention is required. A *red* rating means that significant attention is needed to ensure the component is achieved. Indicators will be accompanied with a narrative analysis of key gaps and constraints to the policy change process.

### **Part III: Summary Conclusions and Recommendations**

The third part draws conclusions based upon the above set of findings and develops recommendations for future action.

#### **AGRICULTURE IN BANGLADESH**

Agriculture is one of the key drivers of growth in the Bangladesh economy, contributing an estimated 18.7 percent to gross domestic product (GDP) in 2012-2013 and employing around 47.5 percent of the total labor force (BBS, 2013). Five percent agriculture growth between 2010 and 2012 (BBS, 2013) has contributed to a strong performance in the Bangladesh economy, despite the prevailing context of negative global growth over the same period. In achieving this, Bangladesh has made substantial progress in enhancing food security through increased production of food grains. Rice production, which has contributed most to self-sufficiency in food grain, has increased from 18 million tons in 1991-1992 to 35 million tons in 2012-2013. Rice currently accounts for 77 percent of gross cropped area and for 94 percent of the total cereal crop area (BBS, 2013). Rice production gains have been mainly driven by an increased use of irrigation water, along with an increased utilization of high yielding rice varieties.

However, the sustainability of domestic food grain production remains an issue. Landholdings are small and scattered, with small and marginal farmers representing 80 percent of all farmers, and food grains continue to be cultivated largely for subsistence. Furthermore, demographic pressures and increased urbanization have caused cultivated area to decline at a rate of 0.25 percent per year, whilst cropping intensity has virtually reached its limit (SRDI, 2013). Although marketed surplus of rice has been rising, food grain imports are needed and procurement remains prone to wide fluctuation. Over the past five years, total annual imports of food grains have ranged between two and five million MT. The emphasis

placed on rice production has also resulted in an increased dependency on imports of traditionally consumed non-food grain commodities, such as pulses, oilseeds, and fruits.<sup>3</sup>

Recognizing the substantial productivity gains the country has made and the level of food self-sufficiency that has been achieved, there is a need to shift policy focus away from production and towards issues of agricultural storage and marketing. Greater focus is also needed on nutrition, with 54 percent of children suffering from stunting.<sup>4</sup>

## PART I: OVERVIEW OF THE INSTITUTIONAL FRAMEWORK FOR AGRICULTURE

There is an extensive institutional architecture in place for agriculture and food security in Bangladesh. The **Ministry of Agriculture (MOA)** is responsible for the development and implementation of policies for the crop sector. The MOA has seven wings<sup>5</sup>, which are responsible for policy formulation, planning, administration and monitoring, as well as 16 agencies responsible for implementing different sectors and projects. Fisheries and livestock are under the responsibility of a separate **Ministry of Fisheries and Livestock (MFL)**. The **Ministry of Food** is responsible for food security policy, food shock management, and targeted food security social programs, while the **Ministry of Health and Family Welfare** oversees nutrition-focused interventions. Responsibilities for the agricultural sector are also dispersed across at least five other ministries, including the **Ministry of Land, Ministry of Environment and Natural Resources, Ministry of Disaster Management and Relief**, and **Ministry of Water Resources (MWR)**. The **Planning Commission**, under the **Ministry of Planning**, is the central planning organization of Bangladesh and determines short- and medium-term policy objectives in line with national strategic plans.

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<sup>3</sup> 70 percent of pulses and 66 percent of edible oil is currently imported.

<sup>4</sup> [http://www.fao.org/ag/agn/nutrition/bgd\\_en.stm](http://www.fao.org/ag/agn/nutrition/bgd_en.stm)

<sup>5</sup> Administration and Input, Policy Planning and Coordination, Extension, Audit, Research, Seed, and Planning

Food policy is regarded as multi-sectoral issue involving several ministries and agencies, but is led by the Ministry of Food. There are four primary bodies responsible for developing and implementing food security policies:

1. The **Food Planning and Monitoring Committee (FPMC)** provides overall leadership in the formulation of food security and nutrition policies. The committee is chaired by the Minister of Food, and includes the Ministers of Commerce, Finance, Agriculture, Local Government and Cooperatives, and Relief and Rehabilitation.<sup>6</sup> The goal of the committee is to monitor the overall food security situation and advise the government on action related to food production, food management, and food and nutrition security<sup>7</sup>.
2. The **National Committee** has overall responsibility for overseeing implementation and monitoring of the National Food Policy Plan of Action (NFP-POA) and its associated Country Investment Plan (CIP). It is also chaired by the Minister of Food and includes representation from ministries, development partners, private sector, and civil society organizations (CSOs).
3. The **Food Policy Working Group (FPWG)** is an inter-ministerial coordination mechanism that facilitates cross-sectoral participation at the technical and operational level in the implementation of the NFP-POA and CIP. The working group is chaired by the Secretary of the Ministry of Food and includes membership from the MOA, MLF, Ministry of Finance, and Ministry of Planning. The aim of the working group is to coordinate strategic and crosscutting issues of food security and it is divided into four directorates each representing a key pillar of food security: availability, access, utilization, with a fourth that facilitates information exchange.<sup>8</sup>
4. Four **Thematic Teams** with specialists from across relevant ministries provide inter-ministerial technical support in line with the four directorates of the FPWG and serve as coordination committees for the NFP and FPP-POA.

The **Food Planning and Monitoring Unit (FPMU)** under the Ministry of Food provides overall technical and administrative support to each of these four bodies. It is responsible for monitoring the food security situation in Bangladesh, storing and disseminating information for food security analysis and policy formulation, and delivering evidence-based policy advice on food security issues. The unit acts as the secretariat for the four food security committees, and also provides support to any ministry in drafting policies related to food security.

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<sup>6</sup> Attendance also includes the Secretaries of the Cabinet Division, Health, Fisheries, and Women and Children Affairs.

<sup>7</sup> <http://www.nfpcsp.org/agridrupal/food-planning-and-monitoring-committee>

<sup>8</sup> <http://www.nfpcsp.org/agridrupal/food-policy-working-group>

FPMU is supported by the **National Food Policy Capacity Strengthening Programme (NFPCSP)**, implemented by the **Food and Agricultural Organization (FAO)** with funding from the **European Union** and **USAID**. The role of the NFPCSP includes: training officials on food policy development, implementation, and monitoring; capacity building to support inclusivity and stakeholder consultation; strengthening the generation, collection, and dissemination of agricultural data; and the promotion of evidence-based analysis.

The **Agricultural Policy Support Unit (APSU)**, a unit modeled after the FPMU, was recently created to provide overall technical and administrative support to the MOA in policy development for agricultural policy. APSU is an independent body within the MOA and implemented by the **International Food Policy Research Institute (IFPRI)** and funded by **USAID**. It is responsible for collecting agricultural data, providing evidence-based analysis for policy-making within MOA, and monitoring and evaluation of policies.

***A detailed institutional map of the key institutions that hold primary responsibility for policy development and implementation; inter-ministerial coordination mechanisms; private and civil society organizations; as well as think tanks and research organizations that impact and influence the food security policy change process is provided in Annex 1.***

# PART II: CAPACITY FOR FOOD SECURITY POLICY CHANGE

## POLICY ELEMENT 1: THE GUIDING POLICY FRAMEWORK

*The policy framework for agriculture and food security in Bangladesh is well defined, detailed, and consistent with national development strategies, although substantial governance challenges remain.*

### OVERVIEW

There is a strong policy framework for agriculture and food security in Bangladesh. The overall national strategic vision and development agenda for Bangladesh is outlined in **Vision 2021**, and the associated **Perspective Plan 2010-2021**. The specific objectives for realizing Vision 2021 are articulated through five-year plans. The **Sixth Five Year Plan: Accelerating Growth and Reducing Poverty (2011-2015)** is currently being implemented, while the **Seventh Five Year Plan (2016-2020)** is currently being drafted.

The **National Food Policy (NFP) 2006** is regarded as the primary policy document on food security and nutrition. Food security is broadly defined as when “people at all times have availability of and access to sufficient, safe, and nutritious food that meets their dietary needs and food preferences for an active, healthy, and productive life.” The NFP represents the country’s first comprehensive approach to food security, moving beyond a traditional single focus on availability issues. The NFP has three objectives: i) adequate and stable supply of safe and nutritious food, ii) increased purchasing power and access to food, and iii) adequate nutrition for all individuals.

The **National Food Policy Plan of Action (NFP-POA) 2008-2015** operationalizes the provisions of the NFP into 26 short, medium, and long-term strategic areas of intervention. These interventions combine short-term food access instruments with long-term productivity programs. The **CIP 2011-2015** builds on the NFP-POA and aims to align existing and future domestic and external funding through 12 priority investment programs that support food availability, access, and utilization.

Agricultural policy in Bangladesh deals narrowly with the development of the crop sector. The **National Agricultural Policy (NAP) 2013** sets the vision for the agricultural sector, with the primary objective to achieve self-sufficiency in food production through increased crop productivity and improved food security systems. Agricultural policy is also supported through a number of sectoral agricultural policies, including the **National Seed Policy**, the **Crop Variety and Technology Development Policy**, **National Integrated Pest Management Policy**, and the **Integrated Small-Scale Irrigation Policy**. Respective

ministries have developed separate policies on livestock, fisheries, land, and forestry. In 2013, MOA, in partnership with MFL, MWR, and FAO, released the **Master Plan for Agricultural Development in the Southern Region of Bangladesh (MPAD)**. The objective of the Master Plan is to provide an integrated road map for the development of the coastal districts of Bangladesh through sustainable food security, poverty reduction, and livelihood development. The government is also working to update the **National Nutrition Policy** and **National Nutrition Policy Plan of Action**.

## **CAPACITY FOR POLICY CHANGE INDICATORS**

### a. Clearly Defined and Consistent Policy Framework

*Status: Yellow*

The policy framework impacting food security and nutrition is clearly defined and consistently applied. The NFP, NFP-POA, and CIP are fully harmonized and the results framework of the Sixth Five Year Plan integrates the same food security impact indicators as the NFP-POA and the CIP (IEH, 2012). However, there is often considerable overlap and lack of consistency in sector specific policy documents across different ministries (e.g. seed, fertilizer, irrigation, agriculture mechanization). Inconsistencies in a range of different policies and rules governing seed quality<sup>9</sup>, for example, have been found to jeopardize seed quality control and private sector development (IFPRI, 2013).

### b. Predictability and Transparency of the Policy-Making Process

*Status: Yellow*

The government has demonstrated a consistent and predictable policy framework for agriculture and food security. Government commitments are clearly articulated and addressed in national policy documents and remain consistent through changes in leadership. All policies are readily available online, and drafts are posted on the FPMU website for public comment.

Bangladesh is, however, ranked as one of the worst countries in the world by Transparency International's Global Corruption Index<sup>10</sup>, and all stakeholder groups have raised governance as a key constraint to the policy implementation process (see Policy Element 5). The Minister of Agriculture has held her position for three terms and is regarded in very high esteem. As a result, the MOA is regarded as more predictable and transparent than its peers.

### c. Clear and Functional Legislative System

*Status: Green*

There is a clear process for legislative drafting in Bangladesh, which is outlined in the Rules of Business (1996) and the Secretariat Instructions (2008). Ministries are responsible for the formulation of policies and laws. The Ministry of Law, Justice, and Parliamentary Affairs (MLJP)

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<sup>9</sup> National Seed Policy, 1993; Seed (Amendment) Act, 1997; Seed Rules, 1998; Seed (Amendment) Act, 2005

<sup>10</sup> [http://www.transparency.org/country#BGD\\_DataResearch\\_SurveysIndices](http://www.transparency.org/country#BGD_DataResearch_SurveysIndices)

must review laws once drafted. The Legislative and Parliamentary Affairs Division of MLJP supports the sponsoring ministry with appropriate legislative language and structure. Once finalized by MLJP, the draft is sent to the Cabinet for approval. After review by the Cabinet, the draft is sent to Parliament, which is governed by the Rules of Procedure of Parliament.

d. Appropriate Dispute Resolution Process/Judicial Framework

*Status: Red*

The judicial system in Bangladesh is regarded as one of the most corrupt sectors in public administration (Transparency International, 2012). It suffers from a high degree of political influence, inadequate legal provisions on appointments, conflicts of interest, ad hoc implementation of laws, and a general lack of transparency and accountability. The judicial process is also poorly suited for dispute resolution for conflicts relating to agriculture and food security, owing to a lack of understanding of agriculture specific issues by the judiciary. Independent arbitration is provided by the Bangladesh International Arbitration Center, which was established in 2011 by the International Chamber of Commerce and Industry, the Dhaka Chamber of Commerce and Industry, and the Metropolitan Chamber of Commerce and Industry. This system is regarded as more effective than the judicial system.

e. Clearly Defined Institutional Responsibilities

*Status: Red*

Food security issues cut across sector boundaries, but ministries and agencies are for the most part organized by sector specific concerns. This leads to a fragmentation of responsibilities and frequent duplication. In the area of nutrition, for example, there are overlapping programs between the Ministry of Food (Food for Work program, Vulnerable Group Feeding), the Ministry of Women and Children's Affairs (Vulnerable Group Development Program), and the Ministry of Health (Health Nutrition and Population Sector Development Program). Similarly, there are overlapping programs for fisheries. The Fisheries Department under MFL has the mandate to utilize inland water bodies to boost yields and create livelihood opportunities for fishing communities, while the Ministry of Land is the legal owner of these water bodies. This creates a conflict between the ministries as the Ministry of Land often leases out the land to non-local fishermen, depriving local communities of livelihood, food, and nutrition.

## **CONCLUSIONS**

Stakeholders regard the legal and policy framework for food security in Bangladesh as robust. The NFP provides a comprehensive food security strategy, which is harmonized with the Vision 2021 and the Sixth Five-Year Plan and operationalized through the NFP-POA and CIP. As follow-on to NFP, and in line with the Seventh Five Year Plan, the government held preliminary meetings on the development of the new Food Security and Nutrition Policy in July 2014. This policy will refocus national food security priorities from a predominant focus on production to a focus on nutrition and sources of nutrition. A

corresponding POA and CIP will again be developed for the plan. However, despite the strength of national policy documents, there remains considerable overlap and a lack of consistency between sector policies. There is a need to consolidate the various agriculture sector policies into a coherent framework, with the current NAP focusing solely on crops.

## **RECOMMENDATIONS**

- 1. Conduct a mapping exercise of agricultural policies:** A mapping exercise should be conducted with the support of APSU across the Ministries of Agriculture, Food, and Fisheries and Livestock to identify policy overlap, inconsistencies, and gaps.
- 2. Develop a national policy for the entire agriculture sector, including crops, livestock, and fisheries:** A committee should be formed including the Ministry of Food, MOA, and MLF to develop a national agriculture policy, based on the findings of the mapping exercise.

## POLICY ELEMENT 2: POLICY DEVELOPMENT AND COORDINATION

*There is a well-developed and comprehensive system for the development and coordination of agriculture and food security policy in Bangladesh. As a result, a number of common constraints and capacity gaps identified in other Feed the Future countries are not observable in Bangladesh.*

### OVERVIEW

In Bangladesh, governance is largely top-down, with the **Executive Branch** of the government, i.e. the **Cabinet**, at the center of all power. The Cabinet decides on policy direction and then instructs the appropriate ministry to develop the policy. The **Ministry of Planning** through the **Planning Commission** has responsibility for national policy planning and coordination in consultation with line ministries. There are no specific rules regarding policy development at the ministerial level, but institutional responsibility is clearly defined and there are specific guidelines on inter-ministerial coordination.

For food security and nutrition, there is a comprehensive institutional structure for policy development and coordination. The Cabinet-level **FPMC** provides overall leadership and oversight in the formulation of policy. Cross-sectoral coordination is provided at the ministerial level by the **FPWG** and at the technical level by the **Thematic Teams**, while the **FPMU** provides policy analysis and policy drafting support. In the case of the development of any major food security policy documents, when a new request is articulated by the FPMC, the first step of the FPMU is to examine the core components of the request, take stock of existing policies, and assemble a list of key ministries and departments that should be included in the process. The FPMU then forms a **National Committee**, which will be chaired by the **Minister of Food**, and comprise relevant ministries, development partners, the private sector, and civil society representatives. A number of technical sub-committees are also formed to address specific technical issues. The relevant ministry chairs these sub-committees, with support from the directors of the FPMU. The sub-committees and National Committee draft components of the policy. Once a draft is completed, the FPMU develops a roadmap for consultation. The draft is shared with relevant ministries and the Cabinet, as well as posted online for public comment.

For the **MOA**, policy development has traditionally been the responsibility of the **Policy Planning Unit (PPU)**. However, the PPU has suffered from staffing and skills capacity constraints, and thus its ability to effectively develop and coordinate policy has been limited. To address this gap, the FPMU joined with the **International Food Policy Research Institute (IFPRI)** to support the development of an **Agricultural Policy Support Unit (APSU)** within the Ministry of Agriculture. APSU has an initial budget of \$3 million and is expected to mirror the model of the FPMU in providing policy support to the MOA.

### CAPACITY FOR POLICY CHANGE INDICATORS

- a. Approved Food Security Strategy/Investment Plan

*Status: Green*

A clear vision and policy road map for food security interventions and investment is provided through the NFP, NFP-POA, and the CIP. The CIP serves as a planning, fund mobilization, and alignment tool for food security policy.

b. Predictable Policy Agenda and Priorities Developed

*Status: Green*

There is a unified framework for the NFP-POA and the CIP. The NFP-POA identifies 26 strategic areas of interventions, priority actions, and policy targets. The 12 CIP programs and 40 subprojects represent a direct aggregation and prioritization of the 26 areas of action areas in the NFP-POA that require investment. For agricultural policy, APSU recently assisted the Ministry of Agriculture in prioritizing 88 projects out of all 480 projects proposed by agencies and departments. These 88 priorities were ranked high, medium, or low, and included as interventions in the MPAD.

c. Annual Work Plans

*Status: Green*

Annual plans are articulated through the Annual Development Programme (ADP), which is prepared based on the annual development budget approved by Parliament. Items are prioritized based on the commitments made in the NFP-POA and the CIP. The Planning Commission is responsible for preparing the ADP, while the Ministry of Finance is responsible for resource allocations.

d. Functioning Coordination Process

*Status: Green*

The development of the NFP, NFP-POA, and the CIP was very collaborative, including 13 ministries, donors, the private sector, and civil society (CIP, 2010). Effective coordination has been institutionalized through the creation of the inter-ministerial FPMC and the technical FPWG. Donor coordination has also been established through the Local Consultative Group Working Group on Agriculture, Food Security, and Rural Development (discussed further in Policy Element 6 – Mutual Accountability). Coordination across the MOA and MLF on policy development for agriculture issues is weaker, with capacity constraints within the policy planning units of both ministries. However, this has improved recently through the support of the FAO in developing the MPAD, and is likely to be further strengthened through APSU.

e. Secretariat/Administrative Support Function

*Status: Green*

The FPMU acts as a secretariat supporting the policy development process by providing planning, coordination, communication, and document management support. The FPMU has benefited from extensive capacity building from the NFPCSP, which has been critical in developing the institutional capacities within FPMU (IEH, 2012).

f. Technical Capacity

*Status: Yellow*

The technical capacity for food security policy development within the line ministries is mixed. Through the FPMU, technical capacity within the Ministry of Food to conduct technical analysis, identify policy issues, and draft policy proposals is high. The FPMU has divisions on food availability, food access, and food utilization and nutrition, mirroring the structures of the thematic teams and the FPWG. Where analytical gaps remain, the FPMU often engages external research institutes to conduct independent analysis (see Policy Element 4 – Evidence Based Analysis).

However, technical capacity within the policy analysis units of the line ministries is much weaker. Policies are often developed without adequate evidence-based analysis and without an understanding of the feasibility of the proposed policy actions. Integrating food security analysis is a challenge, with the sector-specific structures of line ministries and institutions leading to a fragmentation of institutional knowledge. There is a limited awareness of food security initiatives taken by different institutional actors and varying understanding of food security issues between officials in different government agencies. MOA employees, for example, are largely concerned with the primary objective of the ministry in increasing rice production and less concerned with cross-cutting issues such as nutrition.

g. Political Support and Approval

*Status: Green*

High-level political support and approval for food security policy is provided by the FPMC, which is a cabinet-level body chaired by the Minister of Food. The Minister of Agriculture has served three terms and is highly regarded within government. Food security policy is also prioritized across different political parties (IDS, 2013).

h. Engagement of Parliament/Legislative Body

*Status: Red*

Power in Bangladesh is heavily centralized with the Executive Branch. The Executive Branch is able to formulate and carry through any particular act of legislation quickly and without much negotiation with the legislative. While there are standing committees within the parliament for both agriculture and food security, it is the Ministers of Food and Agriculture who ultimately define the legislation.

## **CONCLUSIONS**

There is a well-developed and comprehensive system for the development and coordination of food security and nutrition policy in Bangladesh. This system provides for effective policy analysis and cross-ministerial coordination through the Thematic Teams and the FPWG, while technical and managerial support is provided by FPMU. This system is far more sophisticated than most other Feed the Future

countries studied, which suffer from common organizational and personnel constraints in the policy development process. In Nepal, for example, the policy analysis unit within the MOA only has three full time analysts, while in Uganda the policy analysis unit has two staff. In Bangladesh, by comparison, the FPMU has a full time staff of over 20 and receives dedicated capacity building and training from the NFPCSP. As a result, new policies undergo a detailed analysis and consultation process.

The policy development and coordination process across the other ministries involved in agricultural policy is much less developed, both in terms of the size of the policy planning units and in terms of their technical capacity for evidence-based analysis. The recent establishment of APSU, which will replicate the operations of the FPMU, is likely to bring the quality of policy-making within the MOA on par with the Ministry of Food. The FAO is also introducing a similar structure for the Ministry of Environment and Natural Resources. However, while these units improve the policy development process, they do not improve the technical capacities of the line ministries under which they operate, raising concerns over the sustainability of the reform process. The MFL has the weakest institutional capacity amongst agricultural sector ministries, but there are currently no plans to bolster its planning unit.

Despite the strong institutional structures, gaps in the policy-making process remain. Numerous stakeholders interviewed noted that the government needs a complete change in mindset when it comes to setting broad agriculture policy priorities. The primary government focus remains on the production deficit; despite the fact that Bangladesh is now a food secure country. There is a need to recognize that MOA's responsibilities to the farmer do not end at the farm gate. This was evident in the recent policy failures surrounding potatoes. A focus on production at the expense of storage and marketing saw a bumper production harvest of potatoes crash the market, with potato prices falling as low as Tk1 (\$0.01) per kilogram in February 2014.<sup>11</sup> Accordingly, there is a need for an honest and open debate on the future policy requirements for agriculture in Bangladesh.

## RECOMMENDATIONS

1. **Explore the potential for the introduction of a FPMU-modeled unit within Ministry of Fisheries and Livestock:** With the recent initiatives to bring the policy development and coordination capacity of the MOA and the Ministry of Environment and Natural Resources in line with the Ministry of Food, there is a need to introduce a similar structure within the MFL. An assessment should be conducted to examine the organizational capacity constraints within the ministry, develop a potential structure for a FPMU modeled unit, as well as the likely resource requirements.

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<sup>11</sup> <http://bdnews24.com/bangladesh/2014/02/06/bumper-misery-greets-potato-growers>

## POLICY ELEMENT 3: INCLUSIVITY AND STAKEHOLDER CONSULTATION

Inclusivity and stakeholder consultation in Bangladesh is constrained by unwillingness to listen from the government and a lack of capacity from civil society and the private sector to effectively develop and advocate a policy position.

### OVERVIEW

While there is no one central private sector umbrella association for agriculture, there are a number of sector specific associations. These include **Bangladesh Fertilizer Association, Bangladesh Seed Association, Bangladesh Rice Mills Owners' Association, Bangladesh Wheat Mills Owner's Association, Bangladesh Poultry Owners' Association, and the Bangladesh Agro-Processor's Association.** The **Federation of Bangladesh Chamber of Commerce and Industry (FBCCI)** represents the sector associations in national policy discussions with government. There is no group representing farmers at the national level. In 2014, the **Food and Agriculture Organization (FAO)** calculated that there were just over 198,000 farmers' organizations, with the vast majority operating with less than 25 members at the community level (FAO, 2014).<sup>12</sup> As a result, the voice of farmers in the policy discussion is minimal.

There is no umbrella group or CSO coordination mechanism for food security and agriculture based CSOs. The **Bangladesh Institute of Development Studies (BIDS)** is the country's largest CSO and has a dedicated agricultural and food security division. BIDS is involved in various aspects of the agriculture and food security sector, including seed production, agricultural extension, climate adaptation, and food safety. For nutrition, the **Bangladesh Civil Society Network for Promoting Nutrition (BCSNPN)** was formed in 2012 as part of the Scaling Up Nutrition (SUN) initiative and represents over 110 nutrition-focused organizations.<sup>13</sup> The objectives of BCSNPN include sensitizing policy-makers on nutrition issues, disseminating evidence-based practices, and revitalizing the National Plan of Action for Nutrition. The network meets once a month, and also serves in a representation role on the **Nutrition Working Group** and the **SUN Initiative.**

There are two organizations responsible for coordination of NGO activities. The **Association of Development Agencies in Bangladesh (ADAB)** is an umbrella organization with a mission to promote and sustain an effective CSO system in Bangladesh. The objectives of the ADAB include capacity building of member organizations, strengthening CSO coordination and the relationship with the government, and promoting policy advocacy and policy intervention. ADAB has over 1,500 members and is supported by a thirteen person Secretariat, an Executive Committee, and over 60 District Committees. On the

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<sup>12</sup> 81 percent of these organizations were established with support from government agencies, 14 percent with support from national NGOs, 5 percent from international NGOs, and less than 0.01 percent were formed autonomously

<sup>13</sup> <http://scalingupnutrition.org/sun-countries/bangladesh/progress-impact/bringing-people-together/civil-society>

government side, the **NGO Affairs Bureau (NGOAB)** within the Prime Minister's Office is responsible for monitoring and assisting all CSOs with overseas connections. In 1996, the **Government-NGO Consultative Council (GNCC)** was formed to provide an open forum for dialogue. The council has a maximum of 23 members, with six representatives nominated from the government, eight from ADAB, and the remainder chosen by the council itself.

## **CAPACITY FOR POLICY CHANGE INDICATORS**

a. Inclusive Participation within the Policy Coordination Management Entity

*Status: Yellow*

While the NFP, NFP-POA, and the CIP all note broad consultations in the policy development process, CSOs and the private sector have expressed concern over their limited voice (IFPRI, 2014). The National Committee has representation from the FNCCI and BIDS. The FPMU often invites stakeholders to contribute their opinions during the policy drafting process.

b. Outreach and Communications

*Status: Yellow*

Drafts of policies under consultation are generally published on the FPMU website. Stakeholders noted, however, that they often did not see an updated draft after the consultation process, which meant that they were unaware of whether their opinions had been heard.

c. Private Sector Participation – Opportunity/Space

*Status: Red*

The private sector is provided limited scope to engage in the policy development process. Where the private sector is invited to participate, it is ad-hoc and issue specific. Farmers groups, in particular, are largely excluded from the policy development process. Research institutes are well respected by the government and are well represented in the consultation process.

d. Private Sector Participation – Capacity to Participate

*Status: Red*

Producers associations in Bangladesh are well organized and have the capacity to participate in the policy dialogue. However, the majority of farmers' organizations in Bangladesh have less than 25 members, and their voice in the policy discussion is minimal. There are a few farmers' organizations that represent farmers at the national level, however these organizations do not have the capacity to be autonomous and sustainable, instead relying on government agencies and donor projects for their operations (FAO, 2014).

e. Participation of CSOs – Opportunity/Space

*Status: Red*

The space for CSOs to meaningfully engage in the policy development process is limited. CSOs usually align by political ideologies and, as a result, there is suspicion on behalf of the government of these groups. As one of the largest and most respected CSOs in Bangladesh, BIDS is often invited to participate in policy discussions. This consultation is largely informal through direct conversations with the ministries.

CSO actors have complained about the new Foreign Donations (Voluntary Activities) Regulation Act, 2014, which grants the NGOAB regulatory oversight over the operations of all CSOs with overseas support, effectively requiring approval of all overseas funding. The act would give the NGOAB authority to monitor and assess activities and cancel registration where it deems appropriate. The act is currently being presented to the parliamentary standing committee for consideration.<sup>14</sup>

f. Participation of CSOs – Capacity to Participate

*Status: Red*

With the exception of BIDS, this assessment was unable to identify any organizations representing civil society that are currently engaging with the Ministry of Food or the Ministry of Agriculture.

## **CONCLUSIONS**

Effective inclusivity and stakeholder consultation requires both a willingness to listen from the government and a capacity on behalf of civil society and the private sector to effectively develop and advocate a policy position. In Bangladesh, both of these conditions are missing. As a result of a historical centralization of power within the Executive, there is a natural hesitancy to engage in dialogue with outside groups. In addition, there is a suspicion on behalf of government of CSOs, many of which have strong political ideologies.

On the other hand, civil society and the private sector do not have the capacity to engage in meaningful policy dialogue. Where the FMPU has made a concerted effort to engage stakeholders in the policy development process, the contribution of these stakeholders has been limited. While there are functioning sector associations, there is no farmers' union or suitable consultative group that speaks on behalf of farmers at the national level. There is also no representative civil society organization that engages in national policy dialogue on agriculture and food security. The organizational structures and capacity of stakeholder groups are considerably weaker than in other Feed the Future countries studied as part of this assessment series, particularly Uganda and Ethiopia. This can, in part, be attributable to the lack of donor focus on capacity building and support that is traditionally seen in African countries.

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<sup>14</sup> <http://www.trust.org/item/20140706193519-lmsyx/>

## RECOMMENDATIONS

1. **Support institutional development for farmers' organizations:** There is a need to support farmers' unions with institutional development and capacity building to increase understanding of government policies and processes, as well as increase lobbying and networking skills.
2. **Create a national platform for farmers:** In line with increased capacity building, a national platform should be created for farmers to develop an organizational structure that can effectively advocate for policy reform at the national level. The goal of this platform should be to articulate policy priorities.

## POLICY ELEMENT 4: EVIDENCE-BASED ANALYSIS

*Access to, and availability of, agricultural data is critical to effective policy formulation. Bangladesh has a long established infrastructure for agricultural statistics, with rice price data going back as far as 1903. Agricultural data systems, particularly regarding production data, are generally considered among the strongest across Feed the Future countries, although the inclusion of evidence-based analysis in the policy-making process is mixed.*

### OVERVIEW

The **Bangladesh Bureau of Statistics (BBS)** is the primary statistical agency in Bangladesh. The BBS has a dedicated **Agriculture Wing** that collects and publishes data for six major crops<sup>15</sup> and 118 minor products, including vegetables, fruits, and flowers. Recorded data includes production forecasts, estimates of crop damage, monthly labor wage surveys, annual land utilization, and irrigation statistics. BBS produces an annual agricultural census every ten years, with the last census conducted in 2008 with technical support from the FAO. The **MOA Department of Agricultural Extension (DAE)** also collects agricultural statistics on production, yields, and acreage, while the **MOA Department of Agricultural Marketing (DAM)** records and disseminates agricultural market prices. The **Food Security Nutritional Surveillance Project (FSNSP)**<sup>16</sup> provides up-to-date, seasonal information on factors affecting vulnerability to food security across six surveillance zones. The data is collected through household surveys, and food security and nutrition bulletins are released bimonthly. National surveys are also conducted in the areas of health and nutrition, and household income and expenditure.

Public agricultural research is managed through the **National Agricultural Research System (NARS)**. NARS has thirteen research organizations, of which six are autonomous under the MOA<sup>17</sup>. The **Bangladesh Agriculture Research Council (BARC)** is regarded as the apex body of NARS, and its objectives include identifying and prioritizing agricultural research to inform national agricultural policy, formulating agricultural research plans, and advising the government on the problems and prospects of agricultural research.

There are also a number of private institutes involved in agricultural research, mostly notably **BIDS** and **International Food Policy Research Institute (IFPRI)**. **APSU** (discussed in Policy Element 2) conducts agricultural policy research in collaboration with NARS and publishes a variety of policy briefs, working papers, and crop reports. In 2013, for example, APSU conducted a policy analysis of the recent surge in

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<sup>15</sup> Aus (harvested March and April), Aman (harvested November and December), Boro (harvested October to March), Wheat, Jute, and Potato

<sup>16</sup> A collaborative partnership between the BBS, Ministry of Planning, BRAC University, Helen Keller International, and the European Union

<sup>17</sup> Bangladesh Agriculture Research Institute, Bangladesh Rice Research Institute, Bangladesh Jute Research Institute, Bangladesh Institute of Nuclear Agriculture, Bangladesh Sugarcane Research Institute, Soil Resource Development Institute

onion prices and released a dataset for a 2011-2012 Bangladesh Integrated Household Survey. Additionally, the **NFPCSP** sponsors a Research Grants Scheme to directly address the policy research needs identified by the **FPMU**. Findings from this research are disseminated through policy briefs and national workshops.

## **CAPACITY FOR POLICY CHANGE INDICATORS**

a. Economic and Financial Analysis Completed as a Component of Planning:

*Status: Green*

The NFP, NFP-POA, and CIP are based on detailed economic and financial analysis. During the development progress for the CIP, for example, BIDS and IFPRI developed six thematic papers. These thematic papers identified major constraints and identified priority areas for investment (CIP, 2010). The Thematic Teams and the FPMU continue to conduct analysis as part of the NFP-POA and CIP implementation process.

b. Performance Monitoring Measures and Targets Developed

*Status: Green*

Performance monitoring measures and targets are aligned across all food security policy documents. The NFP-POA consists of a results matrix of 26 areas of intervention and 300 actions that provides the framework for monitoring activities. The monitoring framework for the CIP, with 12 programs and 40 sub-programs, is aligned with the NFP-POA.

c. Quality Data Exists for Policy Monitoring

*Status: Yellow*

The quality of agriculture data is regarded by stakeholders as relatively robust and adequate for informed policy-making, particularly for rice, although gaps remain. BBS has a robust national and regional infrastructure, supported by technical assistance from development partners, and a good reputation for the collection and production of statistics among stakeholders. DAE follows different statistical approaches and significant inconsistencies have often been observed with BBS data, particularly for fruits and vegetables with DAE data tending to be more optimistic than BBS (BBS, 2012). A recent FAO project<sup>18</sup> has worked with BBS and DAE to harmonize data collection methods and develop a process for collaboration, and both organizations report a streamlined working relationship. Additionally, DAM has proved inefficient at collecting and disseminating agricultural marketing information. The web portal on agricultural marketing is not functioning properly, with prices for the wrong market type (i.e. retail prices incorrectly recorded as producer prices) for several markets. USAID is currently supporting DAM to design a new agricultural marketing information system.

d. Quality Data Available for Policy-Making

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<sup>18</sup> FAO Harmonization and Dissemination of Unified Agricultural Production Data

*Status: Yellow*

Agricultural data and research is largely publically available and shared in a timely manner. The FPMU, through the NFPCSP, has developed a Documentation Centre and Electronic Repository that offer a large collection of hard copy and electronic resources related to food security. Most documents can be downloaded directly from their website.<sup>19</sup> BBS produces an annual Yearbook of Agricultural Statistics and all collected data is published on the BBS website, although some concern was raised by stakeholders over the timeliness of publication of data for non-crop products. Stakeholders also raised concerns about the quality of websites for government ministries and agencies. The information available on the MOA, MFL, and Ministry of Food is largely out of date and incomplete.

e. Inclusion of Analysis in the Policy Development Process

*Status: Yellow*

The inclusion of analysis in the policy development process across the government is mixed. While the institutional structures for food security and nutrition policy provide a strong foundation for evidence-based analysis, with the FPMU addressing the policy analysis needs of the Ministry of Food, the centralization of power within the Executive often leads to top-down management. This was recently raised by the BBS (2012), who noted “an increasing lack of awareness of the importance of statistics among policy designers and decision-making.” National surveys are often collected without any consideration of their potential uses in the policy-making process and a lack of capacity within ministries to analyze available data and research leads to the preparation of policy decisions based on notional ideas.

f. Annual Performance Measurement Report Produced and Reviewed

*Status: Green*

A joint approach for monitoring and evaluation was designed in 2012, and an annual CIP and NFP-POA monitoring report is produced and published by the FPMU. The findings from the monitoring reports are circulated and discussed in multiple forums, moving from the Thematic Teams to the FPWG and the National Committee and ending up at the FPMC.

g. Independent Analysis Capacity Exists

*Status: Green*

There is a strong independent capacity for agricultural and food security policy analysis. The NFPCSP and the APSU provide the focal points for independent policy analysis within the Ministry of Food and Ministry of Agriculture respectively. In addition, there are a number of research institutes engaged in policy research, most notably the BIDS and IFRPI.

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<sup>19</sup> <http://www.nfpcsp.org/agridrupal/about-library>

## CONCLUSIONS

Bangladesh has a long established infrastructure for agricultural statistics, with rice price data going back as far as 1903. The quality and availability of agricultural data and policy research is regarded as among the strongest across Feed the Future countries. Bangladesh was, for example, the first country to complete the Women's Empowerment in Agriculture Index (WEAI) in 2012.<sup>20</sup>

Within the Ministry of Food, the capacity for evidence-based analysis is high. Under the leadership of the PFMU, with technical support from the NFPCSP, national food security documents are based on detailed economic and financial analysis. For example, in 2013 the NSPCSP commissioned the Soil Resource Development Institute (SRDI) to challenge the assertion commonly accepted as fact in policy-making that 1 percent of agricultural land is being eroded per year. The study found that in actual fact the figure was only 0.244 percent over the period 1976-2010. Within the MOA, APSU will serve to similarly boost the evidence-based analysis capacity for policy-making.

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<sup>20</sup> The Women's Empowerment in Agriculture Index (WEAI) measures the empowerment, agency, and inclusion of women in the agriculture sector in an effort to identify ways to overcome those obstacles and constraints. WEAI forms part of the monitoring indicators for Feed the Future projects.

## POLICY ELEMENT 5: POLICY IMPLEMENTATION

*Bangladesh differs from other Feed the Future countries studied in that the Ministries of Agriculture and Food are politically powerful, have developed implementation structures, and are regarded as high performing ministries. Despite this, a number of challenges to effective policy implementation remain.*

### OVERVIEW

Bangladesh has a strong institutional architecture for food security that provides effective inclusion and coordination in policy implementation across all relevant ministries and units. The **National Committee** provides high-level cross-ministerial oversight for progress towards NFP-POA and CIP implementation. The **FPWG** is responsible for implementation and monitoring the NFP-POA and the CIP at the operational level, while the **Thematic Teams** conduct the monitoring and evaluation process. Technical support is provided at all levels of implementation by the FPMU (FPMU, 2014).

For agricultural policy and the implementation of the MPAD, an **Inter-Ministerial Coordination Committee (IMICC)** mirrors the responsibility of the National Committee in overseeing the implementation process. Similarly, the **Inter-Ministerial Implementation Committee (IMIC)** serves the same functions of the FPWG in promoting cross-sectoral participation at the technical and operational level. **District and Upazila (sub-district) Implementation Committees** are responsible for implement decisions on the ground and periodically review performance of programs.

For the implementation of projects, each ministry has a **Planning Unit** that is responsible for preparing proposal documents<sup>21</sup> with the support of the relevant departments. A **Selection Committee**, headed by the Minister or Secretary, reviews and approves all project proposals. Once approved, the proposal is sent to the **Agriculture, Water Resource & Rural Institution Division** of the **Planning Commission**. Projects under \$3 million can be approved by the Planning Commission but higher amounts must also be approved by the **Executive Committee of the National Economic Council**, chaired by the **Prime Minister**. Once approved, the proposal will be sent to the relevant department within the ministries for implementation. Larger departments, such as the DAE, the Department of Livestock, or the Department of Fisheries, have dedicated Project Implementation Units, which coordinate the implementation process.

### CAPACITY FOR POLICY CHANGE INDICATORS

a. Implementation Plans Developed

*Status: Green*

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<sup>21</sup> This should include project goals, list of activities, implementation arrangements, time schedules, financial commitments, and performance indicators.

NFP-POA operationalizes the provisions of the NFP into 26 short, medium, and long-term strategic areas of intervention. These interventions combine short-term food safety programs with long-term productivity programs. The CIP builds on the NFP-POA and aims to align existing domestic and external funding and mobilize additional resources through 12 priority investment programs. The MPAD is aligned with the CIP and operationalizes eight agricultural program areas with a regional focus.

b. System in Place to Analyze Implementation Capacity Constraints

*Status: Green*

There is a comprehensive system for analyzing implementation capacity constraints. For food security policy, this bottom up and multi sector approach starts with the FPMU and the Thematic Themes, and then works up through the FPMC and FPWG. For agricultural policy, a similar bottom up approval process starts with Upazila and District committees and then moves to the IMIC and the IMICC.

c. Food Security Policy Priorities Aligned with Work Plans of Line Ministries

*Status: Yellow*

Strategic plans and budgets of the line ministries should align with the NFP-POA and CIP through the ADP and the Medium Term Budgetary Framework. In practice, however, ministries demonstrate a high degree of political autonomy. Food security policy is viewed as the responsibility of the Ministry of Food to implement; crop policy is viewed as the responsibility of the MOA; fishery policy as the responsibility of the Department of Fisheries, etc. When the World Bank's National Agricultural Technology Project (NATP) tried to develop village level extension services through the establishment of Common Interest Groups (CIG), for example, each Ministry wanted to have separate CIGs. This was despite the fact that farmers often don't just grow crops, or livestock, or fish, but instead a combination of products. This political autonomy has been particularly evident in the lack of a comprehensive cross-ministerial strategy for agriculture, although the recently completed MPAD has begun to address this problem.

d. Policy Implementation Budget Committed by Host Country

*Status: Red*

In 2014, the CIP budget totaled \$12 billion, with \$8 billion completed or ongoing (FMPU, 2014). Over a five-year period, this works out at an annual budget of \$2.2 billion. Factoring in the near \$3 billion spent on social safety net food programs, total annual net spend on food security is \$5 billion. The financing gap is currently \$4.1 billion for the CIP (FMPU, 2014) and \$7.2 billion for the MPAD (MOA, 2013).

e. Supplemental Implementation Funds Secured

*Status: Green*

The agriculture and food security sector has benefitted from a strong interest from DPs, who have provided both financial and technical support. Of the total amount committed to the CIP, DPs have invested \$1 for every \$1.72 for of government funding (FMPU, 2014). In addition, Bangladesh received supplemental funding from the Global Agriculture & Food Security Program (GAFSP) for \$50 million in 2011 for technology generation, climate adaptation, and water management.

f. Administrative and Technical Capacity of Staff to Implement Policy Change

*Status: Red*

The administrative and technical capacity of staff to implement policy change is mixed. NFPCSP has substantially boosted the capacity of the Ministry of Food and FPMU to monitor policy performance, and IFPRI is supporting the MOA and APSU with similar functions. However, there is a considerable skills gap at the project implementation level. DP-funded projects benefit from substantial assistance in start-up and implementation. However, this is mostly done through international consultants, and doesn't build implementation capacity within the departments. Government funded projects often do not receive the same support and staff lack necessary skills in project management, budgetary planning, and performance monitoring. The Department of Food, for example, noted great difficulty in hiring qualified consultants and project directors during project start-up. These positions are highly sought after, and as a result, a lot of lobbying is done at various levels of the ministry and government, which influences the decision-making process and can lead to hiring of people unsuitable for the position.

g. Monitoring and Evaluation

*Status: Green*

The capacity for monitoring and evaluation (M&E) in Bangladesh is high and analysis far exceeds what is typically seen in many other Feed the Future priority countries (IFRPI, 2014). The FPMU tracks progress towards the implementation of the NFP-POA and the CIP and publishes an annual joint monitoring report. Each ministry also conducts monthly review meetings from project implementation, chaired by the Minister or Secretary, and produces an annual performance report.

The Ministry of Planning conducts M&E on projects under the ADP through the Implementation Monitoring and Evaluation Division (IMED) and publishes a monthly implementation report. The Planning Commission also conducts a performance analysis of every project, although its impact is limited. While the Planning Commission has authority over project approval and conducts its own review of project performance, it has no authority to withhold funding based on poor performance.

## CONCLUSIONS

Bangladesh differs from other Feed the Future countries studied in that the Ministries of Agriculture and Food are politically powerful, have developed implementation structures, and are regarded as two of the highest performing ministries in Bangladesh. Despite this, there are a number of challenges to effective policy implementation. These include a lack of resources, inadequate institutional setup, insufficient technical capacity, and governance issues.

*Resources:* The largest challenge to effective implementation is a lack of resources, with a large proportion of the budget going to food subsidies at the expense of implementation. The nearly \$3 billion spent annually on food safety net programs dwarfs the annual CIP budget of \$2.2 billion. The financing gap for the CIP is currently \$4.1 billion (FPMU, 2014). Similarly, the estimated investment for the MPAD is \$7.2 billion.

*Institutional Configuration:* The separate institutional structures across the Ministry of Food, MOA, and MFL is not appropriate to support the needs of farmers as producers of a diversity of agricultural products. This has been particularly evident in the lack of a comprehensive cross-ministerial strategy for agriculture, although the recently completed MPAD has recently begun to address this problem.

*Skills:* While the FPMU and APSU are receiving considerable technical support in policy implementation and monitoring and evaluation, there is a gap in the technical capacity within departments across the MOA, Ministry of Food, and MFL in project implementation. Departments lack basic project management skills, as well as the capacity to examine the cost of proposed projects, which results in substantial budgetary inflation (estimated by stakeholders interviewed to be as high as 40 percent for agricultural projects). Support for policy change should be more closely linked to human capacity development to ensure greater sustainability. There is a need to support departments with training in project management, including proposal writing, budgetary management, and performance monitoring.

*Governance:* Governance and corruption is a problem at all levels of the policy implementation process in Bangladesh. Transparency International (2012b) notes considerable public sector implementation challenges as a result of widespread corruption, dominant patronage networks, and the politicization of bureaucracy. The Ministries of Food and Agriculture are regarded as two of the highest performing ministries, so issues of governance are not as pronounced. However, corruption still is still an issue, particularly in the area of public food procurement.

## RECOMMENDATIONS

1. **Provide training to departments on effective project management:** Training is needed to address the lack of technical capacity within the departments responsible for project implementation.

Training needs to be tailored to each department but should include project management, proposal writing, budgetary management, and performance monitoring.

2. **Conduct a Public Sector Expenditure Review:** A Public Sector Expenditure Review should be undertaken to assess the policy alignment, operational efficiency, and effectiveness of financial expenditure across the Ministry of Food, MOA, and MFL.
3. **Support the development of financial efficiency projects within each ministry:** In order to minimize budgetary inflation and padding, small (two to three person) projects should be developed with the objective of costing out standard project expenditure line items. This will serve as a reference for expected costs while project budgets are completed.
4. **Strengthen the authority of the Planning Commission:** The Planning Commission currently serves in an independent M&E capacity, but has no power to enforce against poor project performance. Greater responsibilities should be given to the Planning Commission in coordinating and monitoring NFP-POA implementation. Granting the Planning Commission greater authority to withhold project funding on the basis of reviews, for example, would serve to reduce poor implementation practices.

## POLICY ELEMENT 6: MUTUAL ACCOUNTABILITY

*The Local Consultative Group provides a strong mechanism for coordination between development partners and the government in Bangladesh, although infrequent meetings of the working groups limit potential benefits.*

### OVERVIEW

Bangladesh actively participates in initiatives to increase harmonization and aid efficiency, and has assumed the principles of the Paris Declaration, the Accra Agenda for Action, and the Busan Partnership for Effective Development Cooperation. A number of active coordination mechanisms have been introduced, and as a result, coordination between the government and DPs has been increasing.

The **Economic Relations Division (ERD)** of the Ministry of Finance is the lead authority within the government for the overall management of aid. The tasks of the ERD include: assessing country needs, coordinating with DPs and government ministries, determining the allocation of external assistance, negotiating and signing assessments, and reporting on aid performance. In June 2010, the government and 18 DPs signed the **Joint Cooperation Strategy (JCS)**, an agreement to improve aid alignment through the development of common platforms for national and sectoral coordination between donors and the government. The **Aid Effectiveness Unit (AEU)** in the ERD is the lead group for implementing the JCS Action Plan.

The JCS institutionalizes aid coordination and mutual accountability through the **Local Consultative Group (LCG)** mechanism. The LCG is composed of 48 bilateral and multilateral development partners and a number of government agencies. The main representative body is the **LGC Plenary**, which is responsible for overall supervision of external aid. Under the LCG, 18 individual working groups meet quarterly to provide sector specific coordination and monitoring. There is an **LCG on Agriculture, Rural Development and Food Security (ARDFS-WG)**, chaired by the Secretary MOA and co-chaired by the FAO<sup>22</sup>. In addition, the **LCG Aid Effectiveness Working Group (AE-WG)** is responsible for monitoring overall progress of the JCS Action Plan. The working group is co-chaired by the Secretary of the Economic Relations Division and the Chair of the DP Executive Committee, and includes representatives from the Prime Minister's Office and the Planning Commission.

### CAPACITY FOR POLICY CHANGE INDICATORS

- a. A Forum Exists for Regularly Scheduled Donor-Government Meetings

*Status: Yellow*

There is a comprehensive structure in place for government and DP coordination through the LCG Plenary and the LCG Working Groups. The working groups are expected to meet quarterly,

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<sup>22</sup> <http://www.lcgbangladesh.org/Agriculture/List%20of%20Members%20-LCG-AFSRD.pdf>

but in practice they meet less frequently. In 2013, for example, the AE-WG only met twice, while the ARDFS-WG did not meet.

b. Joint Policy Priorities Developed

*Status: Green*

The JCS Action Plan (2010) articulates priority actions, as well as specific targets, timelines, and responsible parties. The action plan is updated on annual basis to reflect progress made and shifting priorities. In addition, each working group prepares a sectoral development results framework, which includes outcomes, indicators, and planning actions.

c. Monitoring System Exists

*Status: Green*

At the national level, the AE-WG is responsible for monitoring progress on the JCS Action Plan. Working groups report semi-annually on progress made toward the JCS Action Plan at the LCG Plenary. Based on these reports, the AE-WG prepares a consolidated JCS Progress Report and updated JCS for the following year. Both these documents are then approved by the Plenary (Ministry of Finance, 2010).

d. Donor Coordination – Alignment and Harmonization

*Status: Green*

In addition to the LCG government-DP meetings, the DPs have two mechanisms for inter-donor coordination. The LCG DP Plenary serves as a high-level information sharing and decision-making group for development partners, while the seven-member LCG Executive Committee is the focal point for coordination with the ERD.

e. Private Sector Accountability

*Status: Red*

There is no private sector representation in the LCG.

f. CSO Sector Accountability

*Status: Red*

There is no private sector representation in the LCG.

## **CONCLUSIONS**

There is a positive working relationship between the government and DPs. Joint priorities have been articulated through the JCS action plan and the LCG provides an effective mutual accountability mechanism. As a result, significant progress has been made on aligning priorities, developing common implementation mechanisms, and bringing financial support into the national budgetary process. Some challenges remain, however, in terms of the different expectations between the government and DPs on the role of the LCGs. The government largely views the LCG as a forum for securing donor funding, and

as a result, meetings for the working groups are held irregularly. DPs, on the other hand, want the LCG to have a greater say in the policy development process.

## **RECOMMENDATIONS**

1. **Advocate for more frequent meetings of the ARDFS-WG:** The ARDFS-WG could be a central forum for policy and program discussion if it were to meet quarterly as required. The impact of similar successful structures in other Feed the Future countries (such as in Ethiopia) can be used to demonstrate the potential benefits of more regular meetings.

# PART III: CONCLUSION

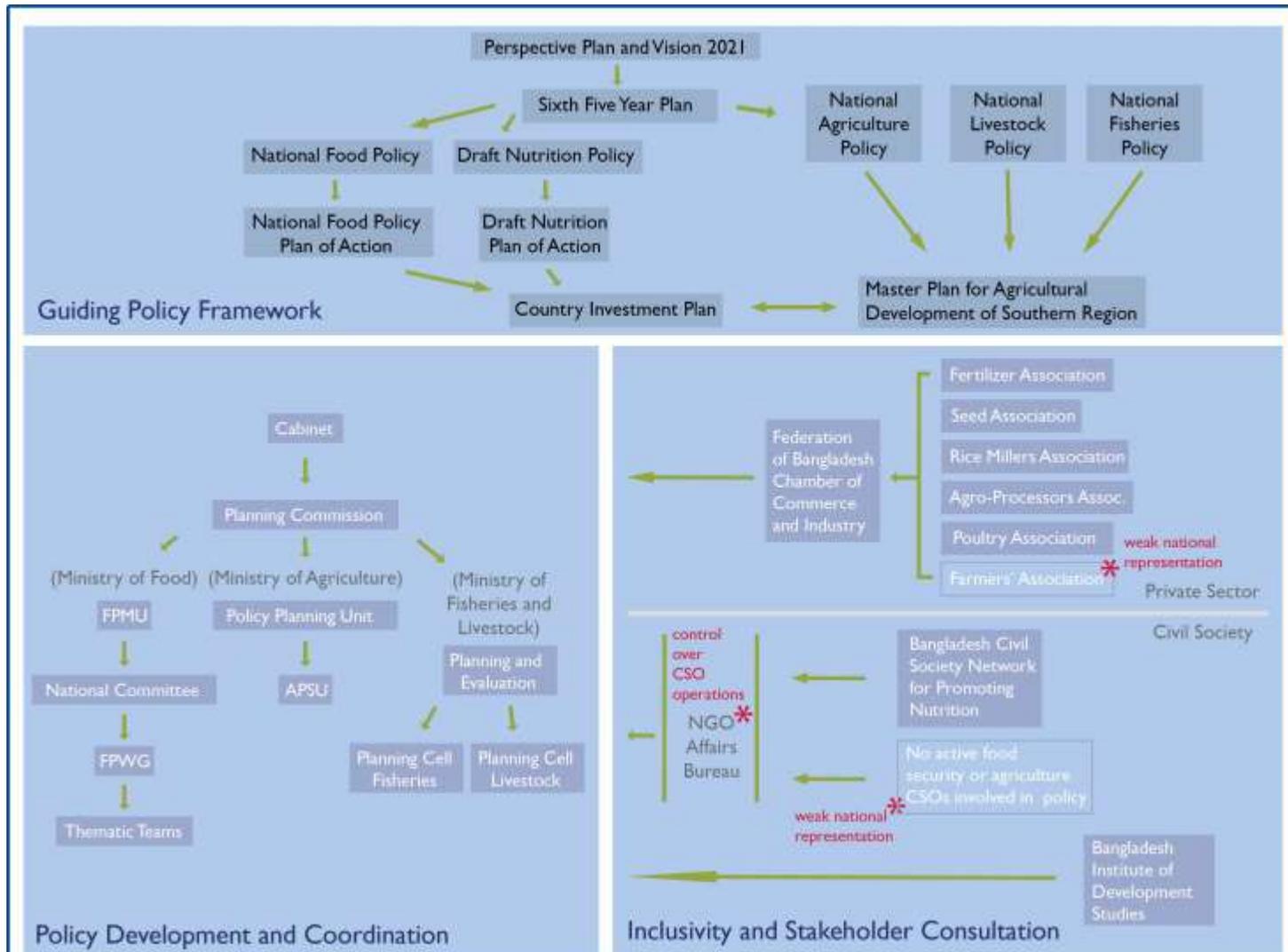
Bangladesh has a well-developed institutional architecture for agricultural and food security policy reform, with established structures, systems, and processes that exceed most other Feed the Future countries. A clear vision and policy road map for food security investment is articulated through the NFP, and operationalized through the NFP-POA and the CIP. The FPWG is responsible for implementation and monitoring the NFP-POA and the CIP at the operational level, while the Thematic Teams conduct the monitoring and evaluation process. Technical support is provided at all levels of implementation by the FPMU. Recent organizational changes within the MOA are set to mirror the structures of the Ministry of Food. The capacity for evidence-based policy-making is high. Under the leadership of the PFMU and APSU, national agriculture and food security documents are based on detailed economic and financial analysis. There is also a comprehensive structure in place for coordination between the government and DPs through the LCG Plenary and the LCG Working Groups.

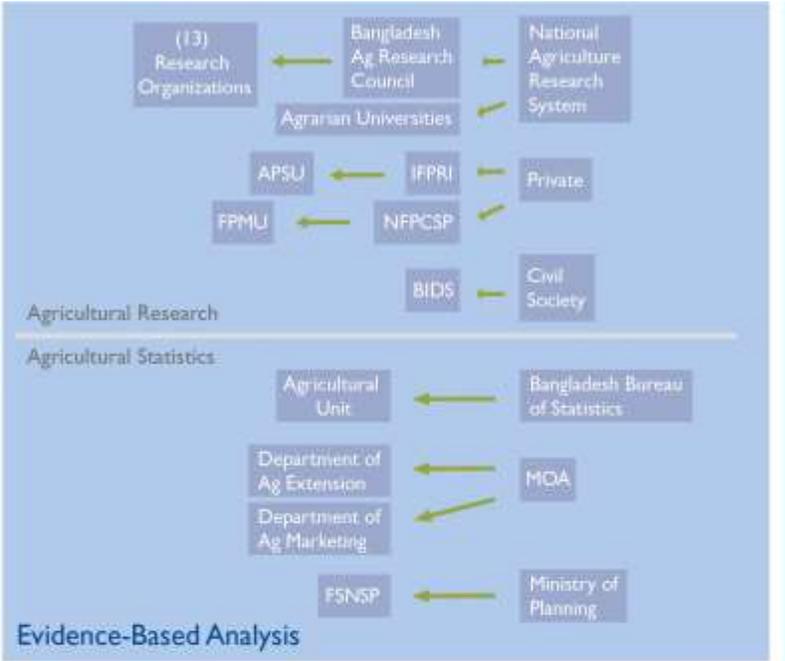
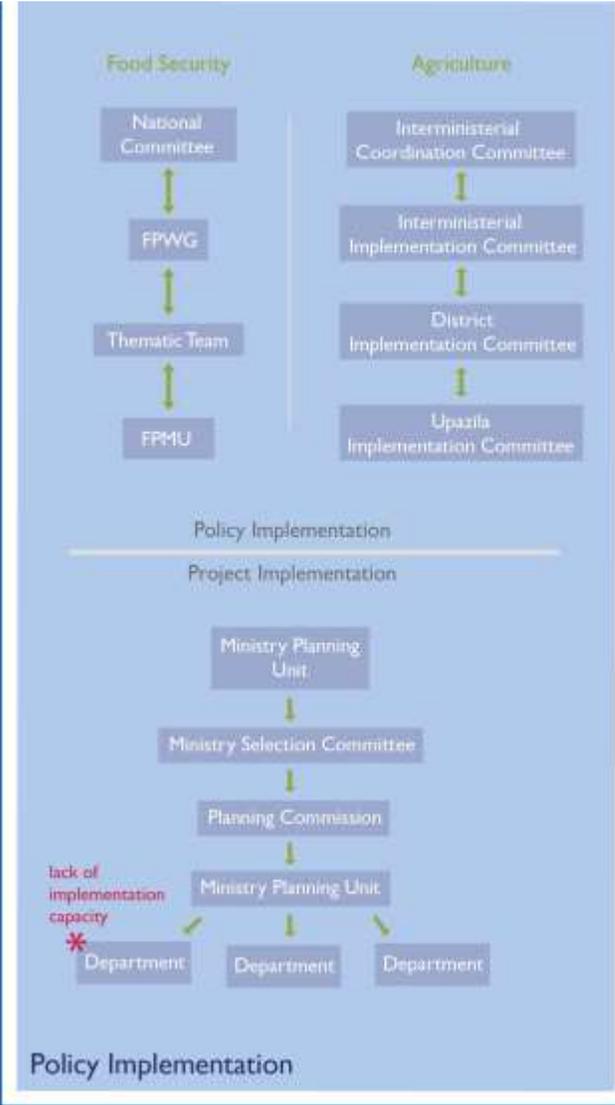
Despite this, a number of challenges to effective policy implementation persist. These implementation challenges are not unique to agriculture and food security, but instead cut across every level of government.

1. **Poor resource mobilization:** The largest challenge to effective implementation is a lack of resources, with a large proportion of the available budget going to subsidies. The nearly \$3 billion spent annually on food safety net programs dwarfs the annual CIP budget of \$2.2 billion. There is a need for a greater 'value-for-money' approach to agricultural and food security expenditure to identify investments that are going to have the greatest return on investment. A Public Sector Expenditure Review would be a strong first step in assessing the policy alignment, operational efficiency, and effectiveness of financial expenditure across the Ministry of Food, MOA, and MFL.
2. **Lack of implementation and project management skills:** While the FPMU and APSU are receiving considerable technical support in policy implementation and monitoring and evaluation, there is a gap in the technical capacity within departments in project implementation. Departments lack basic project management skills, including the capacity to examine the cost of proposed projects, which results in substantial budgetary inflation of up to 40 percent. Providing project management training to departments in proposal writing, budgetary management, and performance monitoring will help improve implementation efficiency.
3. **Poor inclusivity and stakeholder consultation:** Bangladesh is constrained by a lack of capacity on behalf of civil society and the private sector to effectively develop and advocate a policy position. This is particularly evident in the lack of a farmers' union or other consultative mechanism that speaks on behalf of farmers at the national level. Support is needed to build the capacity of farmers' unions to understand government policies and lobby for policy change. In particular, the creation of a national platform for farmers' unions can help develop and articulate clear national policy priorities.



# ANNEX 1: AGRICULTURE & FOOD SECURITY POLICY CHANGE INSTITUTIONAL MAP





# ANNEX II: CAPACITY FOR POLICY CHANGE INDICATORS

- **Red:** Requires significant attention to ensure the component is achieved.
- **Yellow:** Progress is mixed. The conditions required to achieve the component are partially achieved, but additional attention is required.
- **Green:** The component is realized to a sufficient degree, and additional attention to this area is not required at this time.

Capacity of Policy Change Indicators	Status		
			
<b>Policy Element 1:</b> Predictability of the Guiding Policy Framework			
<b>Clearly Defined and Consistent Policy Framework:</b> The policy framework impacting food security policy-making is clearly defined, and consistently applied and enforced from year to year.			
<b>Predictability and Transparency of the Policy-Making Process:</b> The policy development process is transparent in accordance with the rules contained within the country's constitution, basic law, and elsewhere in the formal legal framework.			
<b>Clear and Functional Legislative System:</b> There is a legislative capacity to deal with food security policy change, and the legislative requirements are clearly defined and predictable.			
<b>Appropriate Dispute Resolution Process/Judicial Framework:</b> The judicial system is perceived as fair and effective, and there is an appropriate system for dispute resolution where conflicts arise relating to food security policy.			
<b>Clearly Defined Institutional Responsibilities:</b> Institutional responsibilities are clearly defined, consistently applied, and predictable from year to year.			
<b>Policy Element 2:</b> Policy Development & Coordination			
<b>Approved Food Security Strategy/Investment Plan:</b> There is an approved/official multi-sectoral, multi-year food security plan developed, which specifies priorities and objectives, and addresses the roles of various contributors, including across government, the private sector, and CSOs. The vision and strategy to improve food security is clear.			

Capacity of Policy Change Indicators	Status		
			
<b>Predictable Policy Agenda and Priorities Developed:</b> The policy items required to achieve the national food strategy have been identified and documented, i.e., specific policy objectives exist.			
<b>Work Plans:</b> There is an annual work plan that identifies objectives and activities in regard to policy development.			
<b>Coordination Process:</b> There is an entity, such as a coordination unit or task force, that has defined membership and meets regularly to discuss, develop, and coordinate food security policy development (and oversee cross-sector coordination).			
<b>Secretariat/Administrative Support Function:</b> There is an adequate staff capability to perform required support processes, including coordination, meeting management, communication, and document management. This may be a stand-alone secretariat, or a responsibility within an existing entity.			
<b>Technical Capacity:</b> There are work groups, or technical committees, that have the authority and capacity to perform the following functions: identify policy and technical challenges/issues; develop sector- or project-specific policies/strategies; consult within the sector; and draft funding proposals. There should be active participation by the private sector and CSOs on the technical work groups (as appropriate).			
<b>Political Support and Approval:</b> There is a line of authority/participation by high-level decision-makers above the ministerial level so as to enable efficient political support for the passage and development of new policies, e.g. involvement of prime minister's office (especially for policies that cut across sectors, e.g. trade and agriculture).			
<b>Engagement of Parliament/Legislative Body:</b> There is engagement from the country's legislative entity to debate and engage on food security issues, and to sponsor and advocate for the required legal/policy changes.			
<b>Policy Element 3: Inclusivity and Stakeholder Consultation</b>			
<b>Inclusive Participation within the Policy Coordination Management Entity:</b> The main coordination entity has: a) clear goals and participation from key government ministries (beyond just Ministry of Agriculture) and; b) some representation from non-government entities, particularly from donors.			
<b>Outreach and Communications:</b> There is a process for interacting with stakeholders and sharing information. This could include regular public "forums," a website of key information, and other mechanisms.			

Capacity of Policy Change Indicators	Status		
			
<p><b>Private Sector Participation – Opportunity/Space:</b> The private sector is provided meaningful opportunity to participate in policy formulation and strategy discussions. This could be through participation in the management/steering committee, in technical work groups and/or through other forums. Communications and interactions should be two-way, and access to key information should be readily available.</p>			
<p><b>Private Sector Participation – Capacity to Participate:</b> Some organizations representing the private sector have the capacity to participate in government-led discussions on food security policy. This is to say they are able to represent their members, they are able to articulate and communicate policy positions, and they are able to provide some level of evidence-based analysis to support their viewpoints.</p>			
<p><b>Participation of CSOs – Opportunity/Space:</b> The CSO sector, including representation from women’s associations and farmers associations, is provided meaningful opportunity to participate in policy formulation and strategy discussions. This could be through participation in the management/steering committee, in technical work groups and/or through other forums. Communications and interactions should be two-way, and access to key information should be readily available.</p>			
<p><b>Participation of CSOs – Capacity to Participate:</b> Some organizations representing civil society, including representation from women’s associations and farmers associations, have the capacity to participate in government-led discussions on food security policy. This is to say they are able to represent their members, they are able to articulate and communicate policy positions, and they are able to provide some level of evidence-based analysis to support their viewpoints.</p>			
<b>Policy Element 4: Evidence-based Analysis</b>			
<p><b>Economic and Financial Analysis Completed as a Component of Planning:</b> National food security priority policy initiatives/investment plans are based on economic and financial analysis, including independent policy analysis. The analysis is available for public review.</p>			
<p><b>Performance Monitoring Measures and Targets Developed:</b> The national food security policies/plans include specific objectives, performance indicators, and targets exist to monitor the accomplishment of the objectives.</p>			
<p><b>Quality Data Exists for Policy Monitoring:</b> There is a database of quality statistics that is used to routinely report and analyze progress in achieving</p>			

Capacity of Policy Change Indicators	Status		
			
objectives. (Analysis to be conducted by USDA – and not as part of this assessment framework.)			
<b>Quality Data is Available for Policy-Making:</b> Data on the performance of the agriculture sector and the food security are publically available and shared in a timely manner. This information is available for others to use and analyze.			
<b>Inclusion of Analysis in the Policy Development Process:</b> Evidence-based analysis is considered and used to develop policy priorities/policy proposals.			
<b>Annual Performance Measurement Report Produced and Reviewed:</b> Evidence-based analysis is produced to review policy effectiveness (for implemented policies). A formal review session is held, and includes key development partners (including principal donors and multilateral partners, such as FAO and IFPRI). Recommendations are developed as a result of the review and incorporated into subsequent plans.			
<b>Independent Analysis Capacity Exists:</b> There exists an independent capacity to analyze food security data and use the analysis to make policy recommendations and engage in policy discussion and advocacy. Such an analysis could be conducted by a research institute, university or similar non-governmental/objective organization. This capacity should be engaged in the government's policy development and review process as, for example, through papers, forums, or participation introduced in official policy review and discussion meetings.			
<b>Policy Element 5: Policy Implementation</b>			
<b>Implementation Plans Developed:</b> The overall food security strategy has been broken down into programs and projects that have: a) a sufficient level of detail to permit implementation; b) have been “packaged” into priority projects that can be managed by ministerial units; and 3) “packaged” priorities can be translated into funding proposals to gain support for projects/programs from development partners (to address financing gaps).			
<b>System in Place to Analyze Implementation Capacity Constraints:</b> An analysis of institutional, workforce, system and financial constraints is conducted. Critical implementation constraints are identified; a work plan is developed to address constraints; and implementation actions are moved forward (and periodically reviewed).			

Capacity of Policy Change Indicators	Status		
			
<p><b>Food Security Policy Priorities Aligned with Work Plans of Line Ministries:</b> The priority policy and associated objectives of the national food security strategy are broken down into specific programs and projects (with a sufficient level of detail) so that line ministries can implement policy actions. The plans of individual ministries, and units within ministries, align with overall national strategy and its policy objectives.</p>			
<p><b>Policy Implementation Budget Committed by Host Country:</b> Resources are committed by the host country to implement the identified policy agenda. Over time, the country’s budget is adjusted to provide adequate financing for the implementation of actions required to implement policy priorities. Budget documents, including budget proposals, are released fully and in a timely manner.</p>			
<p><b>Supplemental Implementation Funds Secured:</b> Proposals can be submitted, and funds secured, to address financing gaps. Funds may come from multilateral funds (such as GAFSP), regional organizations, bilateral donors and the private sector.</p>			
<p><b>Administrative and Technical Capacity of Staff to Implement Policy Change:</b> Administrative and technical capacity exists within the government to effectively manage the implementation process. There is a system to coordinate implementation across departments.</p>			
<p><b>Monitoring and Evaluation:</b> Capacity exists within the public sector, private sector, or civil society to review the effectiveness and impact of policy changes. Sector reviews are performed and other research evidence is collected. There is a system to share, store, and access the findings from these reviews.</p>			
<b>Policy Element 6: Mutual Accountability</b>			
<p><b>A Forum Exists for Regularly Scheduled Donor-Government Meetings:</b> These meetings discuss policy and programs and set priorities. Meetings may include, for example, Joint Sector Reviews, sector working groups, or other similar arrangements.</p>			
<p><b>Joint Policy Priorities Developed:</b> A document exists that articulates the shared policy objectives between the government and the donor community.</p>			
<p><b>Monitoring System Exists:</b> Performance measures exist (for the performance commitments of the government and for the performance commitments of the donors). There is a schedule for reviewing and documenting progress – at least on an annual basis.</p>			

Capacity of Policy Change Indicators	Status		
			
<b>Donor Coordination – Alignment and Harmonization:</b> There is a process for donor participation in the food security policy process and for aligning government and donor objectives and priorities. Donor programs should contribute directly to host country strategies, plans, and objectives. This may include the signing of cooperation frameworks that indicate a joint commitment to specific policy change goals.			
<b>Private Sector Accountability:</b> The government provides feedback to the private sector on the performance of the food security program (including the private sector’s role) and provides an opportunity for dialogue on the program and its performance.			
<b>CSO Sector Accountability:</b> The government provides feedback to the CSO sector on the performance of the food security program (including the role of CSOs) and provides an opportunity for dialogue on the program and its performance.			

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