



Measuring and Curbing Illicit Financial Flow: Existing Work and Policy Actions in Bangladesh



Kamal Hossain

Additional Director
Bangladesh Financial Intelligence Unit
The Peoples' Republic of Bangladesh
E-mail: kamalfepd@gmail.com



Economic Landscape of Bangladesh



- Size of Economy-GDP 420.52 Billion USD
- Sustainable Economic Growth over the past years (7.1 in 2022_WB)
- Emerging Economy
- Classified as "Next Eleven" emerging market-and one of the "Frontier Five" emerging economies in the world by Goldman Sachs and JP Morgan respectively
- The Govt. envisions to graduate BD into higher middle-income status by 2031, and eradicate poverty on way to becoming a developed nation by 2041





Impact of IFF



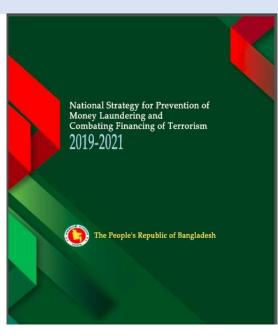
- Research indicates Bangladesh faces an annual loss of more than 8 billion USD due to trade misinvoicing
- Government loses Tax and Revenue
- Hampers Economic Growth
- Pressure on Foreign Exchange Market
- Creates a pressure on the government to resort to external borrowing
- Pressure on Government's Spending on Infrastructural Development
- Impact on Foreign Direct Investment



Policies and Legal Framework



- Inter Agency Task Force for Stolen Asset Recovery Established in 2007
- IFF is criminalized as Money laundering Offence under MLPA 2012
- National Strategy for Prevention of Money Laundering and Combating Financing of Terrorism 2015-17
 - Strategy -4; To Guard against Illicit Flow of Fund from Home and Abroad
- NST 2019-2021
 - Strategy 1: conduct a study to find out the amount of outward IFF and their destinations
- Bangladesh's 8th Five-Year Plan (2021-25) aims to attain SDG
- Issuance of TBML Guidelines, 2019
- Development of Stolen Asset Recovery Strategy and Guidelines, 2022
- Active Participation in International Forum
- Initiatives Taken to Measure IFF





Previous Experience



- Bangladesh participated at the Pilot Project on "Statistics and Measuring Illicit Financial Flows" implemented by UNODC, UNCTAD and ESCAPE during 2020-2022
- IFF associated with Drug Trafficking is measured
- Bangladesh Financial Intelligence Unit (BFIU) acted as focal point agency
- National Consultant Recruited
- 23 Stakeholders actively engaged with the project
- Key stakeholders and data providers were
 - ✓ Department of Narcotics Control (DNC), Central Drug Addiction Treatment Centre (CDATC), National Institute of Mental Health (NIMH), Other LEA agencies
- Coordination mechanism established and several meetings and national level workshop arranged



Challenges We Dealt with



- Covid-19 pandemic
- Data insufficiency
- Scattered information
- Lack of Inter-agency coordination
- Lack of proper record keeping or database management
- Varieties of stakeholders and professions involved like LEAs, militias, drug addiction treatment centers, hospitals/clinics, NGOs etc.



Achievement from the Project



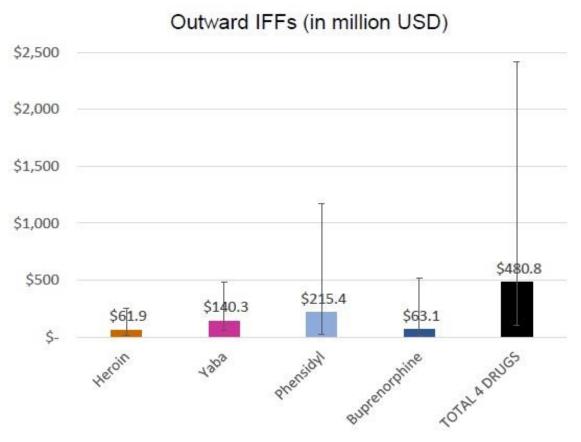
- 1st initiative ever for measuring IFF
- Enhanced inter-agency collaboration and coordination
- Opportunity to work with different stakeholders in single platform with common goal
- Stakeholder engagement and awareness building
- Enhancement of expertise of the relevant stakeholders



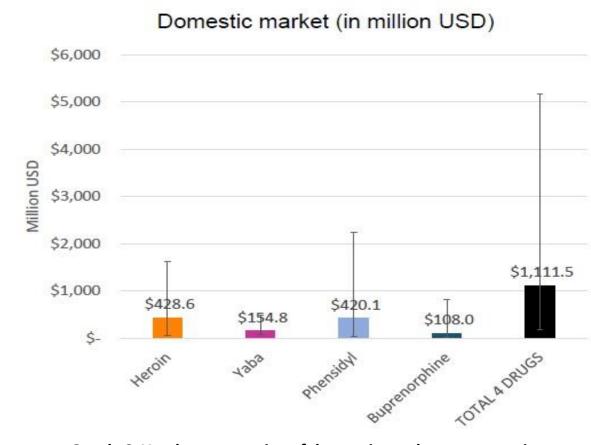
Results/Findings of the Study



Yearly average of IFF associated with drug trafficking - 480.8 million USD (2017-2021)



Graph-5: Yearly average of IFF - 2017 to 2021



Graph-6: Yearly average size of domestic market-consumption



Continue the Venture



- Bangladesh affirmed its interest to continue the activities in measuring IFF
- Sought for assistance in measuring IFF associated with tax and other commercial activities
- ESCAPE came up with the project on "Measuring and Curbing IFF" associated with Tax and Commercial IFF
- Bangladesh nominated two focal points to carry out the project
- A webinar held on 27 June 2023



Trade Landscape of Bangladesh



- Import dependent Country (Total import in 2021-22 was 75604.4 million USD, where total Export was 43603 million USD)
- Major import partner countries are China, India, Singapore,
 Malaysia, Indonesia, USA, Japan, Brazil, Qatar and Saudi Arabia
- Major Export Partner Countries are USA, Germany, UK, Spain,
 France, Italy, Poland, India, Netherland and Japan



Data Sources and Key Stakeholders Identified



- Bangladesh Financial Intelligence Unit (focal point)
- Bangladesh Bank
- Commercial Banks
- Bangladesh Customs
 - Customs Intelligence and Investigation Directorate (CIID)
 - Customs Houses
- National Board of Revenue
 - Central Intelligence Cell (CIC)
 - Transfer Pricing Unit
- Anti-Corruption Commission
- Ministry of Commerce
 - **Export Promotion Bureau**

THANK YOU!

