

Study on

Identifying Regulatory Barriers and Improving Transparency in the Shipbuilding Industry



International Business Forum of Bangladesh (IBFB)

Identifying Regulatory Barriers and Improving Transparency in the Shipbuilding Industry

Introduction and Background

Global Perspective of Shipping

The whole globe is the premise of the shipping industry. Shipping is the most environmentally benign form of commercial transport for carrying all kinds of cargo from port to port, country to country and from continent to continent across the bays, seas and oceans. Shipping is the life blood of the global economy. Without shipping, international trade, the bulk transport of raw materials and the import and export of food items as well as manufactured goods would not be possible. The international shipping industry is responsible for the carriage of around 90% of the world trade.

Ships are technically sophisticated and high-value assets. A large ship may cost over 100 million US dollars to build. The operation of merchant ships generates an estimated annual income of over 300 billion US dollars in freight rates within the global economy, representing about 5% of the total world trade. There are around 50,000 various types of merchant ships trading worldwide, transporting every kind of cargo with a combined tonnage of around 600 million gross tonnes. These ships are registered in over 150 nations and manned by over one million sea farers coming from almost every country of the world.

International Nature of Shipping Regulations

Regulations concerning shipping are developed at the global level. Since shipping is inherently international, it is subject to uniform to regulations with regard to construction standards, navigational rules and standards of crew competence. In the absence of uniform regulations, conflicting and diverse national regulations could possibly result in administrative confusions and commercial distortions badly affecting the efficiency of world trade.

The International Maritime Organization (IMO), the London based UN agency, principally regulates the shipping industry and is responsible for the safety of life at sea and the protection of marine environment. The International Labour Organization (ILO) is, however, responsible for the development of the labour standards applicable to sea farers worldwide. The IMO has adopted a comprehensive framework of detailed technical regulations which govern the safety of ships and protection of marine environment. National governments, as members of IMO, are required to implement and enforce these international rules and ensure that the ships which are registered under their national flags comply them. The principal responsibility for enforcing IMO regulations concerning ship safety and environmental protection rests with the flag states (i.e. the countries in which merchant ships are registered- which may be different to the country in which they are owned). The flag states enforce IMO requirement through inspection of ships conducted by a network of international surveyors. Much of this work is delegated to bodies called Classification Societies. Flag state enforcement is supplemented by Port State Control office. Port State Control officers have the power to detain foreign ships in port, if they do not conform to international standards. IMO regulations are thus enforced on a more or less global basis.

Rationale

Shipbuilding Industry is considered to be an emerging sector that may significantly contribute to employment generation and national economy. But the growth of the sector is believed to be badly affected by regulatory barriers and complexities giving rise to corrupt practices which act as disincentives to investors. An in-depth analysis of steps, procedures and practices involving corruption and making recommendations to curb such corrupt practices should make this vital sector more acceptable to investors and entrepreneurs.

Objective

The objective of this study is to analyze the regulatory barriers of shipbuilding industry and improving transparency in this vital sector. The study also aims at making tangible recommendations for overcoming the regulatory hurdles and malpractices for creating an enabling business environment in the sector. The study will help identify the sources of regulatory barriers and complexities prevalent in various stages of the overall system.

Methodology

The study is based on both primary and secondary data. For primary data sources a questionnaire was designed to obtain both qualitative and quantitative information. A diverse range of questions were set which comprised of objective questions, tables and structured questions. The questions were set in a standard questionnaire format comprising of a set of 20 questions.

The target respondents were selected from top managerial tiers of shipbuilding firms and chambers associated with the Shipbuilding Industry. Some 25 respondents were selected from people associated with the Shipbuilding Industry. Discussions were held with 10-15 participants associated with the Shipbuilding Industry. The secondary data were gathered from diverse literatures including journals, articles, publications etc.

Shipbuilding Industry – Bangladesh Perspective

Shipbuilding Industry is one of the early industries developed in Bengal based on its old business of building boats and sea vessels. Many countries of Asia and Europe regularly bought ships built in Chittagong. The history of indigenous shipbuilding in Bangladesh goes back a long way. It began with wooden-bodied passenger vessels having two decks and gradually improved to steel-body construction of multi-deck passenger carriers in the eighties as the passenger transportation in riverine route peaked. It is sailed that, World famous tourist Ibne Batuta came to Bangladesh in the 14th century and went back through a wooden ship built in a dock located at Sonargoan near Dhaka.

The European Traveler Mr. Caesar Frederick entered Bengal in 1567. According to him, Chittagong port was the best centre of building ocean- going vessels in the middle of the 15th century. In the 17th century, the entire fleet of ships of the sultan of Turkey was built at Chittagong. Caesar Frederick wrote that every year Chittagong exported 25 to 30 ships to other countries including Alexandria. According to him, the ships built at Chittagong were more attractive than those built at Alexandria. The craftsmen engaged in shipbuilding at Chittagong were mostly illiterate. They had acquired the art of shipbuilding as an inherited skill.

Venetian traveler Missia wrote that abundant timbers and other necessary elements suitable for shipbuilding were available in Sandwip and Chittagong. The Sultan of Turkey bought ships built at

Chittagong because they were the best and easily available. The shipbuilding industry flourished at Chittagong because loha kath (*xylia dolabiformis*), segun (*tectona grandis*) and jarul kath (*lagerstromia speciosa*) suitable for shipbuilding which were available in abundance in the Chittagong hill tracts. Once the Sultan of Turkey got thirteen ships of sails built at Chittagong less than one order. In the 17th century, the entire fleet of ships of the Sultan of Turkey was built at Chittagong.

During the Mughal period, Bengal was at the top in building ships and boats. The Mughal naval force had a huge number of ships of this region and the ships built at Chittagong were used in the battles. In the first part of the nineteenth century, the shipyards of Chittagong manufactured ships up to 1,000 tons. The British Navy also used ships built at Chittagong and in 1805; it used them in the famous battle of Trafalgar. In 1818, the Germans procured a ship built from Chittagong. It was named the Deutschland Frigate. The list of ships owned by the Calcutta port in 1924 included 11 English ones, of which 8 were built at Chittagong. The Arabian Muslim merchants came to Bengal for trade during the eighth and ninth centuries.

The site selection for Khulna Shipyard was made in 1954. A German firm was responsible for the establishment of the shipyard which took three years to build. A British consultancy firm was made responsible for running the shipyard. Since 1967, the shipyard is being run by the local engineers and staff. Engineering equipment, pumps for irrigation, cargo vessels for fertilizer and seed, oil tankers and rail crossing barges were built in this shipyard. Many organizations got their work done in this shipyard. Garbage trucks and foot-over bridges are being built by this shipyard. Six thousand and fifty new ships were built in this shipyard. In the mid 80's, the slipway carriage of the shipyard was broken in an accident. Then it became a losing concern.

Bangladesh got its first exposure of international shipbuilding in 1979, when the inland shipbuilding was at its emerging stage. Japanese shipbuilding giant Mitsui Engineering and shipbuilding Industry development the first and the largest joint venture shipyard with High Speed ship building and Engineering Co. Ltd. at Fatullah, Dhaka and were able to build eight grain carriers under international tender floated by FAO according to the International Classification.

Recent developments in Shipbuilding Industry are quite promising and have attracted mass attention both at home and abroad. Ananada Shipyard and slipways Ltd. and Western Marine have come up with all standard building facilities that enabled them to receive export orders. For the first time Ananda shipyard exported ocean going ships in 2008 to Denmark and Uganda and added the name of Bangladesh in the list of shipbuilding nations.

Rules and regulations enacted by the Government in shipbuilding industry in Bangladesh

Bangladesh Government has rules and regulations for controlling domestic shipbuilding industry. The industry related people have to follow the rules and regulations imposed by the Govt. The ministry of shipping has been looking after this industry. There are some other authorities from govt.'s end to control this sector such as BIWTA which was set up for development, maintenance and control of water transport and of certain inland navigable waterways. The East Pakistan Government promulgated an ordinance called the East Pakistan Inland water Transport Authority Ordinance 1958 as the successor of the former EPIWTA which led to the creation of BIWTA.

There is an international Law for all shipping nations which ensures the "Safety of Life at Sea (SOLAS)" is called "Flag State Implementation (FSI)". It means the country flag shown in the ship

represents the ownership of the ship and it belongs to that country. The ship is registered in that country and the country has to ensure the safety of that ship. Under the provision of the United Nation Convention on the Law of the sea (UNCLOS) and The International Maritime Organization (IMO) conventions, Administrations are responsible for promulgation laws and regulation and for taking all other steps which may be necessary to give these instruments full and complete effect so as to ensure that, from a point of view of safety of life at sea and protection of the marine environment, a ship is fit for the service for which it is intended. The government conducts a survey before registering the ship on the government register book. If the govt. official find any discrepancy in the ship then the ship does not get permission to sail. If everything is okay then it will get permission to start its voyage.

Government Policy for developing an export oriented shipbuilding industry

Over the last few years Bangladesh has enlisted its name as an export oriented shipbuilding country. But till now there is no specific law/policy/ordinance for export oriented shipbuilding industry in Bangladesh and there is no specific ministry to look after this industry. The export oriented shipbuilding industry has been developing by its own in the country. The govt. does not seem to entrust any specific Ministry to monitor this sector. The Govt. has recognized shipbuilding as a thrust sector as mentioned in the Industrial Policy 2010 with some short focal Ministries to look after the industry. Ship design, construction, inspection and maintenance are related to the Ministry of Shipping (MOS). The domestic shipbuilding is connected with MOS and its agency and department of Shipping (DOS).

For the export oriented ships no ministries are currently looking after the matter, the rules are yet to be finalized. As there are no certain structured rules and regulations for export oriented shipbuilding industry, the export oriented shipbuilding industry has been running under the international convention. For the shipbuilding there are some international rules and regulations adopted by International Maritime Organization (IMO). They follow the IMO conventions. Bangladeshi export oriented shipbuilders are maintaining rules and regulations for manufacturing ships for foreign buyers. Some companies have been able to achieve the certificate from international Classification Society such as Germanischer Lloyd (GL) which enables them to export ship comfortably. Classification Societies are organizations that establish and apply technical standards in relation to design, construction and survey of marine related facilities including ships and offshore structures. The vast majority of ships are built and surveyed to the standards laid down by the Classification Society. These standards are issued by the Classification Society as published rules. By maintaining the international conventions, Ananda Shipyard & Slipways limited has exported its first ship to Denmark in 2008 and thus enrolling Bangladesh as a shipbuilder in list of world shipbuilding nations.

The complex inter-linkage and relationship between few ministries are indicated in the following figure which shows that several ministries are concerned with shipbuilding industry but Ministry of Shipping appears to be strongly related.

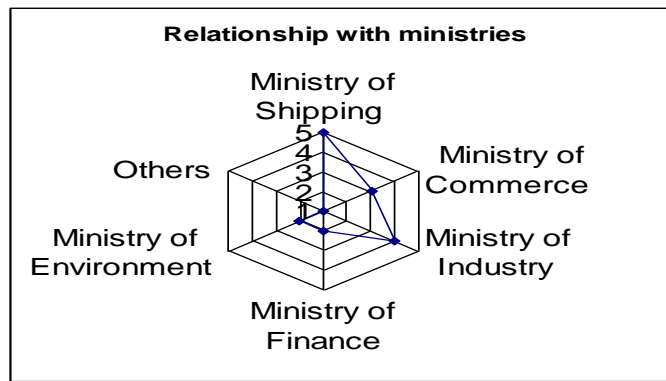


Fig. 1: Showing the Inter-linkages of Ministries in Shipbuilding

Ministry of Commerce and Ministry of Industry are relatively less significant. However, Ministry of Environment has a significant influence on shipbuilding industry by regulating and implementing environmental law. Finance ministry is not directly related with shipbuilding but it has a great impact on shipbuilding industry when it comes to bailout or such financial issues.

A closer look at problems of Shipbuilding Industry

Financial problem is often acute for shipbuilding industry. Shipbuilder needs huge working capital for manufacturing ships which can't be met by company's capital or customer down payment. But as the loan's amount was very big and there is no such significant solid collateral, banks are not interested to take that much of risk by financing such huge amount of loan to a single firm. If they do, they charge high interest rate.

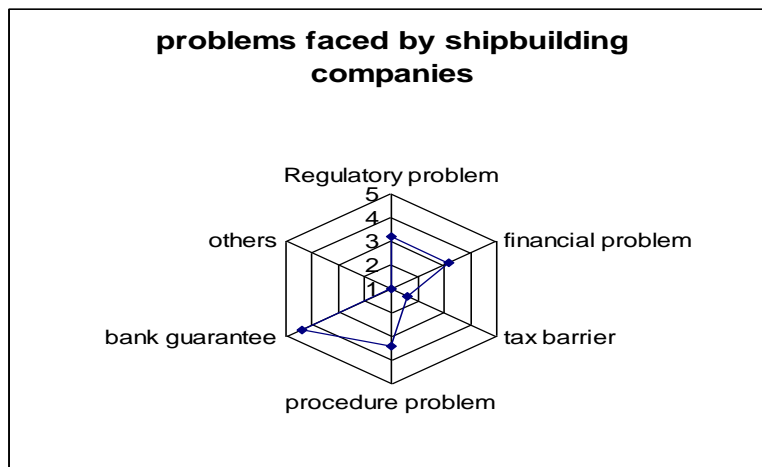


Fig. 2: Problem Areas in the Shipbuilding Industry

Bank Guarantee is considered to be the most significant problem for shipbuilding industry, especially for the export oriented shipbuilding industry as the foreign buyers do not accept Bank guarantee from local bank. So, local banks have to contact with foreign banks on behalf of the company for bank guarantee which ultimately increases the processing cost and thus cost of manufacturing ship increases. In case of green channel facility the raw materials had to be cleared within 24 hours but because of the procedural problems sometimes it becomes delayed. Tax can't be a barrier for exported oriented shipbuilding as there is 5 years tax holiday but companies which have been running in the industry beyond 5 years are deprived from such facilities. There are some other problems such as foreign currency problems, advance payment for drawing etc.

Respondent's View

In response to the structured questionnaire, over a dozen of individuals provided their views which summarily stand as under:

Awareness status about Govt. Policy to regulate Shipbuilding Industry

About 62% of the respondents were not aware of any Govt. policy to regulate Shipbuilding Industry.

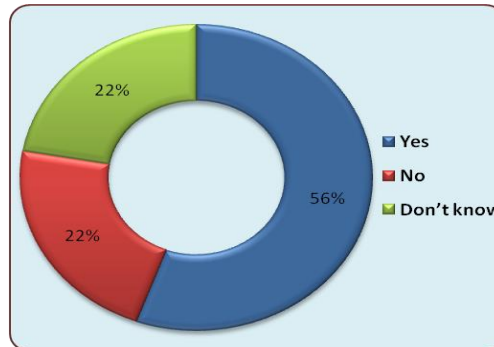


Fig. 3: Showing awareness status about Govt. Policy on the Shipbuilding Industry

The above figure shows industry people's awareness status on the existence of govt. policy for regulating shipbuilding industry. According to the study, 56% respondents from industry know that there is a policy to regulate this industry, whereas 22% people think there is no such policy from govt. end and 22% people do not even know whether there is any govt. policy or not to regulate shipbuilding. However, the fact is, Govt. has a policy to regulate the local shipbuilding industry but no policy has been developed for export oriented shipbuilding industry.

Issuance of license for Shipbuilding

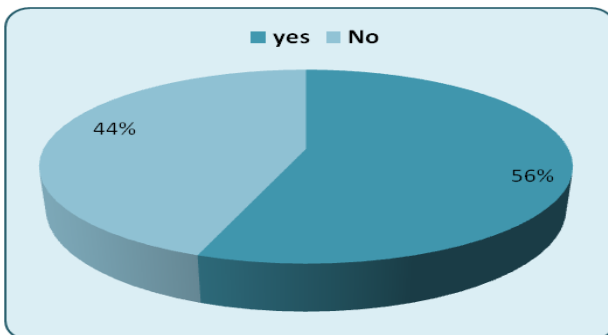


Fig. 4: Time required for issuing a license

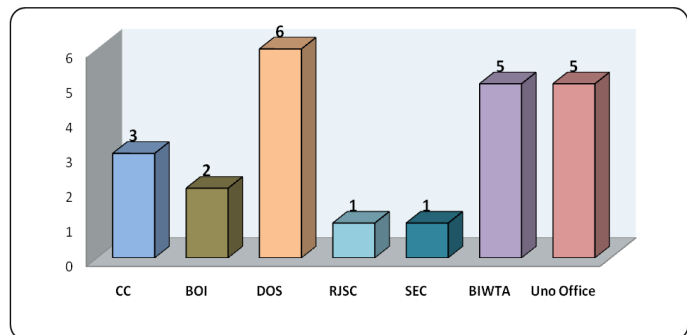


Fig. 5: Authorities involved in issuing license

Majority (56%) of the respondents were of the opinion that the time taken by the license issuing authority was not appropriate. Regarding involvement of departments/issuing authority, the responses were extremely variable showing involvement of multiple authorities in the licensing process.

Access to land for establishing Shipyard

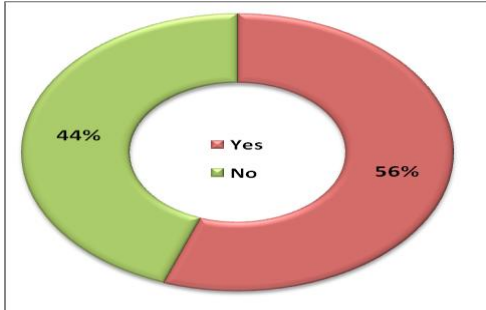


Fig. 6: Access to land for shipyard

Majority (56%) of the respondents reported to have faced problem in getting a land, while the remaining 44 % reported no problem to access land.

Import of raw materials

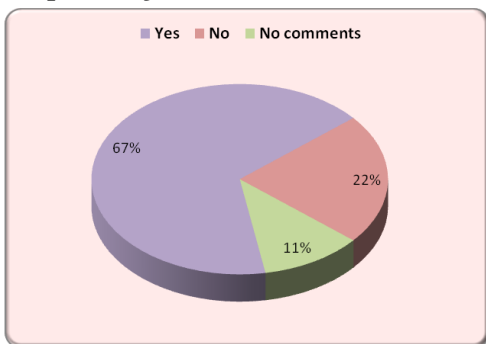


Fig. 7: Problems associated with import of Raw Materials

Almost two-thirds of the respondents reported to have faced problem in importing raw materials while 22% reported to have no problem, and remaining 11% respondents preferred to have no comment on the issue.

Financial Assistance and Bank Guarantee

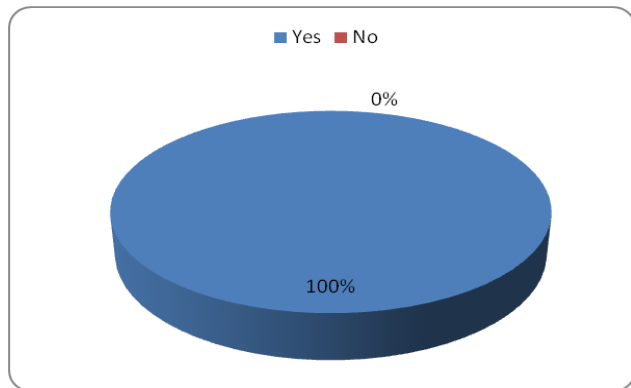


Fig. 8: Response regarding financial assistance

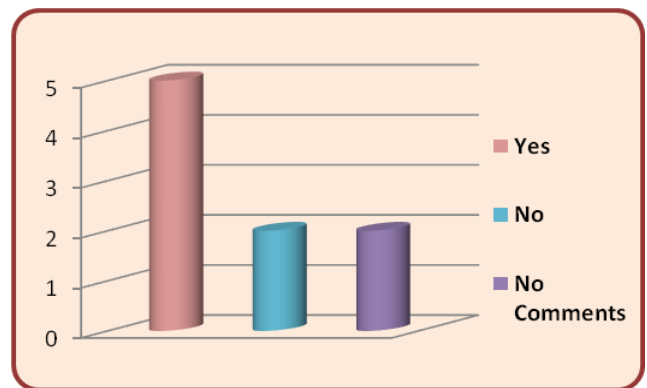


Fig. 9: Response regarding Bank Guarantee

Almost all respondents opined that an effective financing assistance was needed for the development of the Shipbuilding Industry. Bank guarantee is considered to be a problem to most of the respondents particularly those who are involved in export oriented shipbuilding.

Summary and Conclusion

This study was undertaken by the International Business Forum of Bangladesh (IBFB) is a part of the research activities supported by USAID-PROGOTI (The United States Agency for International Development - Promoting Governance, Accountability, Transparency and Integrity) under the on-going project entitled “Mobilizing the Private Sector to Encourage and Support Anti-Corruption Reform, Phase 4”. The objective of the study is to analyze the regulatory barriers of Bangladesh Shipbuilding Industry and improving transparency in this vital sector. The study also aims at making tangible recommendations for overcoming the regulatory hurdles and malpractices for creating and enabling business environment in the sector.

The world shipbuilding industry holds the largest portion of global transportation sector and is continuously growing. The industry’s main driving force is economic growth because sea is the main source of exportation and importation of goods and services across countries and continents. The industry requires huge investments in capital, labor and technology. Creating ships is a very long process and orders in the shipping industry are placed long before they are built. Shipbuilding is predominantly a technology-driven sector with constant improvement of engineering skill which keeps one ahead of the others in global competition.

The prospects for Bangladesh Shipbuilding Industry are mainly attributed to i) large pool of practically experienced shipbuilding workforce (available welders, cutters & shipwrights may be trained quickly with codes and standards), ii) vast river frontage and quite deep water up to sea, iii) low “Cost of Human Input” as a major strength, and iv) a reasonably low cost of infrastructure. An analysis of trend indicates that Shipbuilding Industry moves towards locations with a lower cost of manpower: Europe → Japan → Korea → China → Vietnam → India; and will continuously move towards locations with a lower cost of manpower.

According to various reports and informed sources, many countries are eager to enter Bangladesh Shipbuilding market and related maritime industries mostly due to lower labor cost which is typically 20-30% of the total ship manufacturing cost. Compared to other shipbuilding nations, the overall investment cost for shipbuilding in Bangladesh is estimated to be 15% lower. The Bangladesh Shipbuilding sector is endowed with a certain level of technical edge that allows it to participate in higher value addition in terms of production. Taking this cue, it could be assumed that while it took around 25 years for the country’s Garments Industry to flourish and play a key role to foreign earnings, shipbuilding could do the same but in less time (in almost 10 years) with higher local value addition, provided a congenial atmosphere is created and sustained. With an aggressive marketing plan, the new breed of entrepreneurs is expected to obtain a notable slice of about 400 billion dollar global shipbuilding business. In order to meet buyer’s requirements in conformities with international standard, skill development is one of the pertinent issue that both the entrepreneurs and Govt. do need to look into.

Responses received from the respondents in some cases were found to be varying and cautious. Nevertheless, it transpired considerable amount of complexities and lack of operational transparency prevailing in this emerging sector. One thing, however, appeared transparent that, except the core people in the sector, others in general are least aware of the potential of the sector’s possible contribution to Bangladesh economy which experts believe to be as great as that of the RMG sector.

As revealed in the study majority of the respondents considered the license issuing process more time consuming and mediated through multiple authorities. A more or less convergent opinion were received on problems associated with access to land for shipyard, import of raw materials, pre-delivery operations, financial assistance and Bank Guarantee which deserve priority attention of the Govt. and relevant authorities to create a congenial environment for the sector to flourish.

This research has extended the scope of further study on shipbuilding industry of Bangladesh. Available reports and information indicate that there is a huge opportunity for Bangladesh to grab the market share of small and medium ships in global market. The exact nature and extent of the market should be explored out critically and the industry should be prepared to meet the market demand.

Shipbuilding is a technology-based heavy industry. No nation, except those endowed with mineral and natural resources, has ever become economically strong without developing the heavy industry, and heavy industry can not be developed without government support. Timely implementation of the recommendations made in the paper is expected to create an enabling business environment for the country's shipbuilding sector to flourish and sustain with global competitiveness.

Recommendations

1. A Special Zone having Technical and Geographical facilities including deep channel, 200+ Meters height of bridges on the rivers and uninterrupted Electricity and Gas supply has to be established for 100% Export Oriented Shipbuilding Industries.
2. Providing Government "Khas Land" at the competitive price in favor of Shipbuilding Industries under Prefixed Rules and Regulations to be jointly arranged by the Ministry of Land and Ministry of Environment.
3. Bangladesh Bank should introduce refinancing at a lower rate to be arranged by the Government for Industrial Loan for setting up Shipbuilding Industry as well as Working Capital.
4. Since Bank Guarantee issued by Local Commercial Banks is not accepted by the Buyer's Bank it is necessary to re-issue the Guarantee by a Foreign International Bank on the basis of the Guarantee issued by Local Commercial Banks. Commission per annum is charged by foreign Banks for issuing Counter Guarantee. Bangladesh Banks may maintain a record of such Guarantee issued by a Local Commercial Bank with cross reference to each other. This will help to avoid issuing counter Bank Guarantee by a foreign Bank.
5. Green Channel facility should be implemented in the real sense and all the corruptions and harassments of the port authority associated with it should be stopped.
6. As practised in other shipbuilding countries, Bangladeshi shipbuilders should have the raw material transfer facility from the buyers without opening L/C.

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Questionnaire

“Identifying Regulatory Barriers and Improving Transparency in the Shipbuilding Industry”

COMPANY NAME :

LOCATION :

1. How long did it take to get a license for your company?

- 1 month 2 months 3 months 4 months 5 months 6 months
7 months 8 months 9 months 10 months 11 months 12 months
1 year 2 years 3 years 4 years 5 years 6 years

2. Do you think the time authority takes for issuing a license is appropriate?

- Yes No Don't know
 If no, what should be the appropriate time?

3. How many departments, offices, agencies or authorities did you need to get a license?

Please write down the names.

- a) b) c) d)
 e) f) g) h)

4. Which department provided you the best services? (Please circle a letter from Q-3)

A / b / c / d / e / f / g / h

5. Which department provided you the worst services? (Please circle a letter from Q-3)

A / b / c / d / e / f / g / h

6. Did you face any problem to get the land for your company?

- Yes No

- If yes, what type of problem do you face?
.....

- How do you overcome the problem?
.....

- And, do you think this process is fair?

- Yes No

7. Did you face any problem to fund your company?

- Yes No

- If yes, what type of problem do you face?
.....

- How do you overcome the problem?
.....

- And, do you think this process is fair?

- Yes No

8. Does everyone face the same problem to fund the company?

- Yes No Don't know

9. **Do you think that everyone gets equal opportunity of the Govt. facilities?**

- Yes No Don't know

10. **Is there easy access to the information in the associated authorities?**

- Yes No

- If no, then how do you collect the information?
.....

- Do you think this process is fair?

- Yes No

11. **Are you regularly informed about any changes in the rules and regulations in the authority?**

- Yes No

12. **Do you face any problem to import the raw material?**

- Yes No

- If yes, what type of problem do you face?
.....

- How do you overcome the problem?
.....

- And, do you think this process is fair?

- Yes No

13. **Do you face any problem to contact with the buyers?**

- Yes No

- If yes, what type of problem do you face?
.....

- How do you overcome the problem?
.....

- And, do you think this process is fair?

- Yes No

14. **Do you face any regulatory obstacle to make a contract with the buyers?**

- Yes No

- If yes, what type of problem do you face?
.....

- How do you overcome the problem?
.....

- And, do you think this process is fair?

- Yes No

15. **Do you think that the order processing time for making a contract is standard?**

- Yes No

- If no, how can it be reduced to a standard level?
.....

16. **Do you face any problem for bank guarantee?**

- Yes No

- If yes, how do you solve it?
.....

17. **How many times do you need to communicate with government authority while manufacturing ship?**

..... Times

18. **Do you face any complexities in regulations to export the ship you built?**

Yes No

19. **Is there any Government Policy to Regulate Shipbuilding Industry?**

Yes No Don't know

20. **Do you think that an effective financial assistance is needed for the development of the industry?**

Yes No

- If your answer is yes, who can play the major role?

.....

I would highly appreciate your any comment or recommendation for identifying the regulatory barriers and increasing transparency in shipbuilding industry of Bangladesh:

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.....
.....
.....
.....

Thank You !

Laws related to Shipping Industry

1. The Merchant Shipping Act, 1923 (XXI of 1923)
2. The Bangladesh Merchant Ships (Registration) Ordinance, 1982(XIX of 1982)
3. The Bangladesh Merchant shipping Ordinance, 1983 (XXVI of 1983)

Shipping related laws and rules implemented by Department of Shipping (DOS)

S.I	Name	Date of Formulation	Date of Entry in force
1.	Inland Shipping Ordinance' 1976 Amendment – 1979,1983,1990,2005	19/11/1976	21/09/1976
	Inland shipping Ordinance' 1976		
	1.1 Inland Shipping (Dangerous goods) REules' 2001	27/09/1999	01/11/2001
	1.2 Inland Shipping (Navigation) Rule' 2001	27/09/1999	01/11/2001
	1.3 Inland Shipping (tonnage) Rule' 2001	27/09/1999	01/11/2001
	1.4 Inland Shipping (recruitment, Examination and certification) Rule' 2001	27/09/1999	01/11/2001
	1.5 Inland Shipping (Passenger) Rule' 2001	27/09/1999	01/11/2001
	1.6 Inland shipping (Fire Appliance) Rules' 2001	27/09/1999	01/11/2001
	1.7 Inland Shipping (Free Board) Rule'2001	27/09/1999	01/11/2001
	1.8 Inland Shipping (Life Savings) Rule' 2001	27/09/1999	01/11/2001
	1.9 Inland Shipping (Examination, Syllabus, Inland Master, Driver etc.) Rule' 2001	27/09/1999	01/11/2001
	1.10 Steel Constructions Ships Rule'2001	27/09/1999	01/11/2001
	1.11 Inland shipping (minimum safemanning) Rule'2001	27/09/1999	01/11/2001
	1.12 Inland Shipping (Stability) Rule'2001	27/09/1999	01/11/2001
	1.13 Coastal Engineer Certification Rule'2001	27/09/1999	01/11/2001
2.	Bangladesh Merchant Shipping Ordinance' 1983 Amendment 1988, 1985,2003	30/06/1983	30/06/1983
	Bangladesh Merchant shipping Ordinance related under thses rules.		
	2.1 Merchant Marine Officer and Ratings Training, Certification, Employment, Watch KeepingRule'2001		01/06/2000
	2.2 Seamen Recruiting Agent (License) Rule'2005		08/08/2005
	2.3 Merchant Shipping (Ration) Rule'2000	15/12/2002	18/12/2002
	2.4 Merchant Shipping (Recruitment)Rule'2001	01/08/2001	02/08/2001

	2.5 Ship Surveyors (Certificate) Rule'2001	29/04/2003	29/04/2003
	2.6 Merchant Ship Navigation Minimum Safe Manning Ordeer'1990	26/02/1990	17/03/1990
	2.7 Bangladesh Fishing Vessels and Deck Officers Certificate Rule'2003	28/09/2003	29/09/2003
3.	Maritime Zone Act' 1974	14/02/1974	14/02/1974
4.	Maritime Zone Act'1974		
5.	Flag Vessel Protection Ordinance'1982	26/09/1982	29/09/1982
6.	Flag Vessel Protection Rules'1982	28/06/1982	28/06/1982
7.	IMO convention implementation regulation'2006	21/11/2006	23/11/2006
8.	Fees Rules	08/11/1990	08/11/1990
9.	1967 Rules		
	The Merchant Shipping Ordinance 1967 related under these rules.		
	9.1 The Merchant Shipping (Distress Messages and Navigational Warnings) Rules 1967	31/10/1967	31/10/1967
	9.2 The Merchant Shipping (Musters) Rules'1967	31/10/1967	31/10/1967
	9.3 The Merchant Shipping (Safety Convention Certificates) Rules'1967	31/10/1967	31/10/1967
	9.4 The Merchant Shipping (Pilot Ladders) Rules'1967	31/10/1967	31/10/1967
	9.5 The Merchant Shipping (Director- Finders) Rules'1967	31/10/1967	31/10/1967
	9.6 The Merchant Shipping (Lifesaving Appliances) Rules'1967	31/10/1967	31/10/1967
	9.7 The Merchant Shipping (Radio) Rules'1967	31/10/1967	31/10/1967
	9.8 The Merchant Shipping (Fire Appliances) Rules'1967	31/10/1967	31/10/1967
10	Training institution fees rules	17/12/2007	17/12/2007

Respondents of the Questionnaire

“Identifying Regulatory Barriers and Improving Transparency in the Shipbuilding Industry”

1. **Engr. Md. Sakhawat Hossain**
Managing Director, Western Marine Services Ltd.
2. **Mr. Mohammad Hossain**
Managing Director, Hossain Dockyard and Engineering Works Ltd.
3. **Mr. Masud Hossain**
Managing Director, SouthMarine Dockyard and ShipBuilders Ltd.
4. **Mr. Md. Nazmul Haque**
Proprietor, Haque Ship Builders Ltd.
5. **Mr. M. Saiful Islam**
Technical Director, Ananda Shipyard and Slipways Ltd.
6. **Engr. Hayatul Karim Khan F.I.E.**
Director, Highspeed Ship Building and Engineering Co. Ltd.
7. **Engr. Abu Md. Fazle Rashid**
Deputy Managing Director, Western Marine Services Ltd.
8. **Cdr. A. R. Mollah, (L), psc, BN**
Deputy General Manager, Khulna Shipyard Ltd.
9. **Mr. Iftekhar Ahmed**
DGM (Finance and Accounts), Bards Bangladesh Agencies Ltd.
And, Executive Member, Bangladesh Shipbuilders Association (BSA).
10. **Mr. Md. Shazzadul Arif**
Project Coordinator, Ananda Shipyard and Slipways Ltd.
11. **Mr. S.M. Faisal Mahmud**
Assistant Engineer (Mechanical), Ananda Shipyard and Slipways Ltd.
12. **Engr. Mizanur Rahman**
Western Marine Services Ltd.
13. **Mr. Shamim Ahmed**
Executive, SeaTech Bangladesh Ltd.
14. **Mr. Prosenjit Saha**
Former IFC Intern at IBFB.