



Informal Trade in Agriculture Items between India and Bangladesh: Analytical Framework

Indian Council for Research on International Economic Relations (ICRIER)



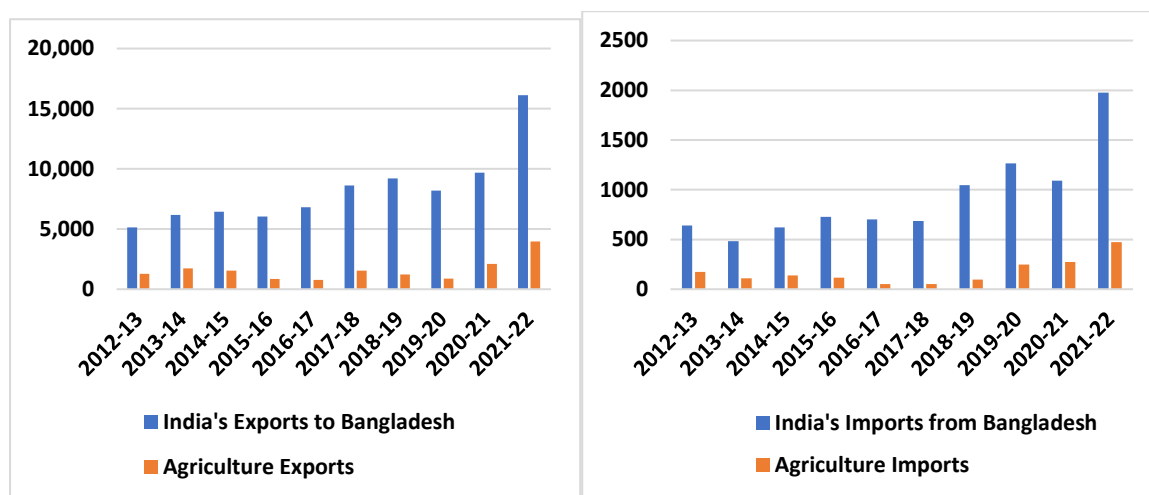
I. Agriculture Trade between India and Bangladesh

With over US\$18 billion volume of India-Bangladesh total trade in 2021-22, Bangladesh is India's largest trade partner in South Asia and India is the second largest trade partner of Bangladesh after China.

India's bilateral trade with Bangladesh has increased more than three times in the last decade showcasing strengthening of the bilateral trade relationship.

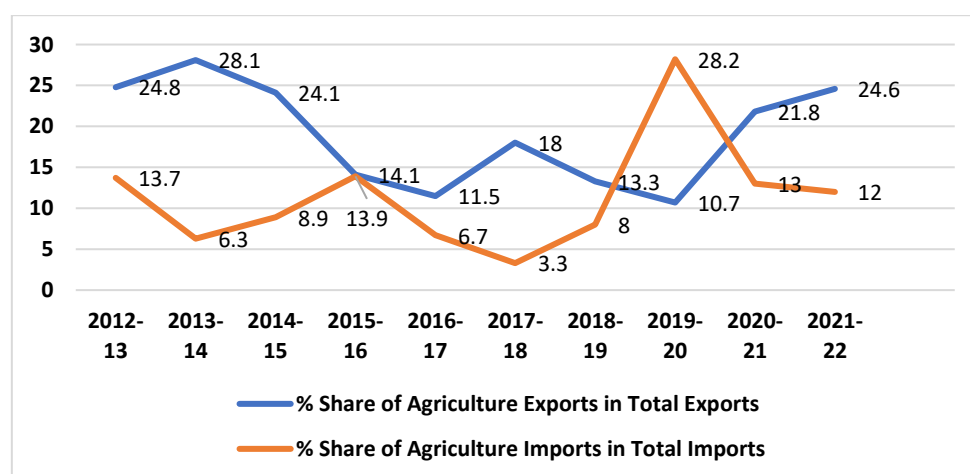
Bangladesh is also one of the largest markets for India's agriculture exports. In the last five years, the share of agriculture items in India's total exports to Bangladesh has increased from 18% in 2017-18 to 24.6% in 2021-22. Grains/cereals like wheat, rice, maize, and sugar were among the top exports.

Table 1: India-Bangladesh Bilateral Agriculture Trade (Values in US\$ million)



Source: EXIM Databank, DGCIS, MoC&I, GoI

Figure 1: % Share of Agriculture in India's Total Exports and Imports with Bangladesh



Source: EXIM Databank, DGCIS, MoC&I, GoI

Major Agriculture Items¹ Traded between India & Bangladesh

India had a trade surplus of US\$3.4 billion with Bangladesh in agricultural and food products in 2021-22. India's exports to Bangladesh stood at US\$3.8 billion in the same year, with cereal as the top agricultural export, contributing 14% to overall exports. The export basket from India to Bangladesh also included sugar and sugar confectionery, coffee, tea, fruits and vegetables (Table 2).

Table 2: Top 10 Agriculture Export Items from India to Bangladesh in 2021-22

<i>HS Code (2-digit)</i>	<i>Commodities</i>	<i>India's Agriculture Exports to Bangladesh</i>	<i>Share in Total Exports (%)</i>
10	Cereals	2245.7	13.9
17	Sugar and sugar confectionery	572.4	3.5
23	Residues and waste from the food industries; prepared animal fodder	256.7	1.6
9	Coffee, tea, mate and spices	217.6	1.3
7	Edible vegetables and certain roots and tubers	205.3	1.3
8	Edible fruit and nuts; peel or citrus fruit or melons	153.7	1.0
4	Dairy produce; birds' eggs; natural honey; edible prod. Of animal origin, not elsewhere spec. Or included	93.0	0.6
19	Preparations of cereals, flour, starch or milk; pastrycooks products	48.8	0.3
12	Oil seeds and olea. Fruits; misc. Grains, seeds and fruit; industrial or medicinal plants; straw and fodder	41.5	0.3
2	Meat and edible meat offal	37.2	0.2
Total of Top 10 Agriculture Exports from India to Bangladesh		3871.8	24.0

Source: EXIM Databank, DGCIS, MoC&I, GoI

Agriculture imports into India from Bangladesh accounted for 24% of total imports in 2021-22. Animal and vegetable fats, cereals, wheat, fisheries, sugar, and processed food items were India's major imports during this year. The items at HS code 2-digit (Table 3) cover 99% of the total agriculture imports into India from Bangladesh.

¹ Agriculture items include HS code (2-digit) from HS-1 to HS-24 and HS-3105 (fertiliser used in agriculture activity).

Table 3: India-Bangladesh Top 10 Agriculture Imports in 2021-22

HS Code (2-digit)	Commodities	India's Agriculture Imports from Bangladesh	Share in Total Imports (%)
15	<i>Animal or vegetable fats and oils and their cleavage products; pre. Edible fats; animal or vegetable wax</i>	262.4	13.3
23	<i>Residues and waste from the food industries; prepared animal fodder</i>	77.6	3.9
3	<i>Fish and crustaceans, molluscs and other aquatic invertebrates</i>	46.3	2.3
19	<i>Preparations of cereals, flour, starch or milk; pastrycooks products</i>	37.6	1.9
22	<i>Beverages, spirits and vinegar</i>	30.7	1.6
17	<i>Sugars and sugar confectionery</i>	10.1	0.5
18	<i>Cocoa and cocoa preparations</i>	4.0	0.2
10	<i>Cereals</i>	2.9	0.1
20	<i>Preparations of vegetables, fruit, nuts or other parts of plants</i>	0.7	0.0
11	<i>Products of the milling industry; malt; starches; inulin; wheat gluten</i>	0.4	0.0
Total of Top 10 Agriculture Imports into India from Bangladesh		472.8	23.9

Source: EXIM Databank, DGCIS, MoC&I, Gol

Even though the share of agriculture trade in overall India-Bangladesh trade has been significant, it remains substantially below the potential. A large part of the trade takes place through informal channels between the two countries. It is driven by several factors including historical socio-economic ties and official domestic and trade-policy measures.

Analytical Framework

Based on the existing literature, we have developed an analytical framework pertaining to two key issues in informal trade (i) the magnitude and pattern of informal trade and (ii) the factors that drive such trade flows.

A scoping exercise has been undertaken to identify items that have been traded informally in the past. It is likely that items that have been traded informally continue to do so and if not, it would be worthwhile to find out why such items are no longer being traded informally. A fresh survey that will be conducted in the course of the study will take into account information collected through the literature survey.

An analytical framework for understanding reasons for informal trade flows can be developed by classifying factors determining informal trade flows into four broad categories (i) *Trade policy barriers*, (ii) *Domestic policy distortions*, (iii) *Regulatory barriers*, and (iv) *Institutional factors*.

Relevant policy and regulatory requirements for each of the items identified in the literature survey have been mapped so that we are able to draw correlations between items traded informally and the regulatory and policy regimes.

I. Magnitude and Pattern of Informal Trade Flows

To identify items that have been traded informally a literature survey was undertaken covering studies which provided estimates of informal trade; studies which identified reasons for informal trade; and studies which identified modalities of informal trade. Studies that have included data on seizures published by security agencies were also included. In addition, an extensive search was undertaken to cover all newspaper dailies and other published articles which have made a reference to informal trade in agriculture items between India and Bangladesh.

The studies provide estimates of informal trade flows between India and Bangladesh based on surveys that were conducted during different time periods. Chaudhuri (1995) was one of first studies in India to provide estimates of illegal trade flows. The study estimated the value of informal exports from India to Bangladesh at INR 11,646.9 million for the year 1992-93 with 96% being accounted for by West Bengal, 3% by Assam and only 1% was accounted for by Tripura. Major commodity groups being traded informally included agricultural products, textile products, and consumer goods with agriculture accounting for 59%, constituting the bulk of informal exports from India to Bangladesh. Of the agriculture items, live animals (mostly cows, bullocks, and buffaloes) accounted for 46%, sugar 34% and salt, rice, lentils, edible oil, fresh fruits and vegetables accounted for the remaining 20%.

One of the earliest studies in Bangladesh, Rahman and Razzaque (1998) provided an estimate of total informal imports into Bangladesh from India at 8317 million Taka. The estimate was based on a field survey carried out in Nawabganj, Kushita, Jessore, Moulavibazar and Comilla districts of Bangladesh. It was found that the share of agricultural products, processed food, livestock and fisheries was 60.4% of the total informal imports. Rice followed by pulses and onion were highlighted as the most important agricultural items imported informally from India.

Based on one another survey conducted by World Bank in Bangladesh in 2002-03, informal trade was estimated to be around US\$500 million (World Bank, 2006). Live animals constituting mainly cows and buffaloes were estimated to be the highest with a share of 43%. The rest constituted agriculture products, processed food, and textiles.

Informal trade between Tripura and Bangladesh was examined by Nath (2012) through a survey carried out in various districts of Tripura, namely, Shimna, Mohanpur, Khowai,

Sonamura, Agartala, Dharmanagar, and Kamalpur. According to this study, informal agriculture exports from Tripura to Bangladesh in 2011-12 was estimated at US\$15 million with 34% share in total informal trade. The identified agriculture items were cows, buffaloes, rice, onion, potato, ginger, turmeric, fish, tea, sugar, milk powder, fruits (banana jackfruit, and pineapple), fertilisers (mainly potash and urea). The study not only highlights Tripura's informal exports to Bangladesh but also import of agriculture items which stood at US\$8 million, comprising fish, ginger refined oil, betel nuts, onion, grapes, chicken, food for poultry farms.

Through Key Informants Interviews (KIIs), Rahman and Bari (2018) pointed out that informal trade takes place in cattle, seed varieties of paddy, wheat, jute, and other agriculture items like fruits and spices. Since cattle is the most smuggled item between India and Bangladesh, the study carried out estimation of only informal cattle trade. The value stood in the range of US\$621.7 million to US\$660.6 million per year for the period 2010-11 to 2013-14. Other studies, Bhattacharjee (2013) and Sur (2020) have specifically studied only cattle smuggling as a substantial component of informal trade between these two nations. These studies have not mentioned any other agriculture item traded informally.

Based on different studies cited above, Table 4 presents estimates of informal trade in agriculture between India and Bangladesh. All estimates are point estimates and refer to different time periods.

Table 4: Estimation of Informal Agricultural Trade in Different Studies (US\$ million)

Study	Year of survey	Informal Agri Exports	Informal Agri Imports	Total Agri Trade	Agri Trade balance	Share of Agri-exports in Total Informal Exports	Share of Agri-imports in Total Informal Imports
Chaudhari, 1995	1992-93	227	2	229	225	59%	13%
Rahman-Razzaque, 1998	1997-98	107	6	113	101	60%	15%
World Bank, 2006	2002-03	379	NA	379	379	74%	NA
Nath, 2012 (Tripura only)	2011-12	15	8	23	360	34%	42%

Some studies have used the data on seizures, maintained by border security forces, to identify items that are traded informally. Das (2014) cites a report that India’s Border Security Force (BSF) had seized hilsa fish, onion, animal hides, cattle entering into India’s bordering district with Bangladesh. Similarly, Hannan (2016) mentions that 98% of outgoing items seized were cattle heads. Other seized agriculture items included, fertilisers, hemp, and garlic.

The recent study by Shafique and Islam (2022) also uses data on seizures collected by Border Guards Bangladesh (BGB). The data indicates that informal agriculture export from India to Bangladesh includes largely cattle and import from Bangladesh to India includes fish, fertilisers, and edible oil. This study does not provide any estimates and mainly reveals that informal cross border trade, security and bilateral relations are interconnected problems.

Another study by Pohit and Taneja (2000) concentrated more on finding factors that influence traders to choose informal channels but did not provide estimates for the same. However, according to survey conducted during the study, agriculture items are pointed out as the most frequently imported commodities from India to Bangladesh through informal channels.

More recently, some studies have highlighted the prevalence of informal trade in agricultural inputs such as HYV seeds (paddy and tomato), fertilisers, machinery (CUTS International 2014; 2017 and 2018). However, these studies do not provide estimates but focus on the key drivers and channels of informal trade. The findings are based on the survey conducted in two districts of Bangladesh, namely, Rangpur and Rajshahi, and three districts in India, Cooch Behar, Malda, and South Dinajpur.

In addition to the above-mentioned studies, Rahman et. al (2012), Singh (2015), Ray (2022), USAID and EAT (2014), Khan (n.d.) have drawn attention to various items that are traded informally between India and Bangladesh. On the basis of all these studies, an indicative list of agriculture items has been identified and presented in Table 5 (Appendix 1a and 1b present details about the references and survey locations where informal trade was discovered).

Table 5: Major Agriculture Items Traded Informally between India & Bangladesh

Product Group	Export from India to Bangladesh (Informal)	Import to India from Bangladesh (Informal)
Seeds	Rice (Swarna, Parijat, Rajendra-Shweta, Miniket), Tomato (rocky), Vegetable Seed, Onion Seed, Jute Seed	Rice Seed (BR11/BB11), (BIRI28/29/Heera), Seeds for Bitter gourd, Cauliflower, Cucumber
Grains	Rice, Pulses, Sugar, Salt	Maize, Paddy/Rice

Product Group	Export from India to Bangladesh (Informal)	Import to India from Bangladesh (Informal)
Fertilisers/Pesticide	Urea, Diammonium Phosphate (DAP), Thaiodan	Sathi (Herbicide)
Vegetables & Fruits; Spices; Fish	Mango, Banana, Apple, Guava, Onion, Betel Nut, Potato, Baby Food: Powdered Milk, Edible Oil, Turmeric, Ginger, Jeera, Fish (Ruhi)	Garlic, Fish (Hilsa)
Machinery/Other Inputs	Tractor Parts & Nut Bolts	CD Pump (Water Pump)

Source: See Appendix 1a and Appendix 1b

II. Factors Driving Informal Trade

An analytical framework for understanding reasons for informal trade flows can be developed by classifying factors determining informal trade flows into four broad categories (i) *Trade policy barriers*, (ii) *Domestic policy distortions*, (iii) *Regulatory barriers*, and (iv) *Institutional factors*.

1. Trade policy barriers

Trade policy barriers largely comprise tariff and commodity restrictions/bans. In the quest for self-reliance in basic food (especially key staples like rice and wheat), India's agri-trade policy has oscillated between export controls and high import duties (Hoda and Gulati, 2013).

- **Tariffs**

The average tariff protection for agricultural products is considerably above that of non-agricultural products in both India and Bangladesh. Thereby, leading to higher prices for agriculture commodities in the partner country. This is evident from the tariff profiles of the two countries. India's average tariff for agriculture products was 34% vis-à-vis 11.9% for non-agricultural products in 2020 (WTO). In the same year, Bangladesh's agriculture products face average tariff of 17.5% and non-agriculture products faces 13.4% (WTO). India's high tariff structure for agriculture goods and food items has created price differential and it was identified as one of the factors providing enough incentive for informal trade between India and Bangladesh (Rahman and Razzaque, 1998).

- **Commodity Restrictions**

On the Bangladesh land borders, many custom posts allow imports of a very limited set of products. Indian exporters therefore have to move such goods over long distances to land ports where such items are permissible or to sea ports/air ports where there is no restriction on items to be imported. This creates a strong incentive for traders to trade informally. Of the 50 land ports notified by the Bangladesh Land Ports Authority, 38 land ports allow trade in a

limited number of items. For instance, in 2019, at Srimantapur-Bibir Bazar, of the total 41 items permissible only 13 agriculture items were permitted. Similarly, from Agartala-Akhaura, of a total of 43 items, only 14 agriculture items were permitted. At the remaining 12 ports, there is a negative list of items which are not permitted to be traded. The major agriculture items which are not permitted through these ports include *Fish, Sugar, Potato, and Powdered Milk*. These items are in fact traded informally from India to Bangladesh.²

On the Indian side even though there are no restrictions on items to be traded through land ports, Customs authorities permit exports of rice, wheat, pulses and edible oils through non-EDI land ports on the Indo-Bangladesh border only if the export quantity is registered with the DGFT. This additional registration requirement restricts formal trade through non-EDI ports.³

- ***Prohibitions and Quotas***

Export prohibitions and quotas are notified annually in India and are usually in place for a specific period during which they are subjected to frequent changes. Such restrictions and uncertainties in policy often imposed on agriculture items encourages informal trade.

For instance, sugar export is subject to frequent government interventions. Export policy of sugar has moved between complete ban on exports subject to registration to open exports through Open General License (OGL).

Another instance is when global food prices had increased, India imposed a ban on non-basmati rice between 2007 and 2011 (USAID and EAT,2014) creating a fertile ground for informal trade.

More recently in the wake of COVID-19 pandemic, trade between India and Bangladesh through the Petrapole-Benapole border had seen a closure. In June 2020, India had allowed export of goods from Petrapole (in West Bengal) but the government demanded Bangladesh's consignments to undergo 14-day quarantine. As a result, consignments were halted at land borders (Press Trust of India, 2020).

The trade policy documents published by the Indian and Bangladesh government also indicate the extent of trade liberalisation. India's EXIM policy classifies all items under three broad categories⁴ - (i) permitted for automatic/free trade, (ii) restricted items requiring authorization/permission/ license or a notified procedure and (iii) banned items. Of the total items facing export prohibition/restriction in India, 19% agriculture items face these measures, while out of all items facing import prohibition/restriction, 30% account for agriculture items.

² National Board of Revenue, Customs Statutory Regulatory Orders (SROs), Bangladesh

³ Directorate General of Foreign Trade, Ministry of Commerce & Industry, GoI; APEDA Notification

⁴ Directorate General for Foreign Trade, Government of India

Similarly, Bangladesh’s Export and Import Policy Order classifies items under the following two categories⁵ – (i) List of controlled export & import items and (ii) List of prohibited export & import items. Out of the total number of items facing export prohibition/restriction, 41% are agriculture items, whereas agriculture items facing such import measures account for only 18%.

Table 6: No. of Agriculture Products facing trade restrictions/prohibition in India & Bangladesh (based on latest notification)

	<i>Trade Flow: Export</i>			<i>Trade Flow: Import</i>		
	<i>Total No. of Items Facing Trade Restriction</i>	<i>No. of Agriculture Items Facing Trade Restriction</i>	<i>Share (%)</i>	<i>Total No. of Items Facing Trade Restriction</i>	<i>No. of Agriculture Items Facing Trade Restriction</i>	<i>Share (%)</i>
India	208	40	19%	407	124	30%
Bangladesh	34	14	41%	73	13	18%

Source: DGFT, MoC&I, Gol; Export-Import Policy Order of Bangladesh

Note: For India, the number of items facing prohibition are given at HS 8-digit classification; For Bangladesh, they are mentioned broadly in their export-import policy order with no HS-code classification.

Of the identified informally items traded in the past, the following Table 7 maps the export and import prohibitions/restrictions in India & Bangladesh.

Table 7: Informally Traded Agriculture Goods Facing Prohibition/restriction in India and Bangladesh

<i>Agriculture Good Traded Informally</i>	<i>India</i>	<i>Bangladesh</i>
Edible oils	Restricted	Import ban of artificial mustard oil
Vegetable seeds	Free Export	-
Tea	Free Export	-

⁵ Export & Import Policy Order of Bangladesh, Bangladesh Custom SROs

<i>Agriculture Good Traded Informally</i>	<i>India</i>	<i>Bangladesh</i>
Fertilizer	Free Import (other than urea)	Conditional Export: Export ban of Urea fertilizer produced in all factories except KAFCO can be exported with the prior approval of the Ministry of Industries
Soyabean oil	-	Export-Prohibited Product
Palm oil	-	Export-Prohibited Product
Wheat	Restricted	Export-Prohibited Product
Rice	Free Export	Export-Prohibited Product
Onions	Restricted	Export-Prohibited Product
Sugar	Restricted	Conditional Export
Hilsa fish	-	Conditional Export

Source: Ministry of Commerce & Industry, Government of India; National Board of Revenue, Bangladesh

- ***Minimum Export Price (MEP)***

Setting of a Minimum Export Price (MEP) does not allow export of a commodity below a specified price. It is imposed to increase availability of commodities in the domestic market and is specifically imposed on items like rice, wheat, sugar, edible oils, onions and potato. An increase in export prices due to the MEP encourages informal trade. Items on which MEP has been imposed have been found to be traded informally between India and Bangladesh.

For instance, following the global financial crisis in 2007-08 the Indian government raised MEP of rice from US\$ 425 MT in 2007 to US\$ 1000 MT by April 2008. Following this policy change, the prices of wheat and rice observed a hike in Nepal and Bangladesh in the same period. The impact of these policies was relatively brief in both countries, as informal trade along the long and porous borders allowed prices to equilibrate relatively quickly (USAID and EATS, 2014)

Bangladesh trade policy also permits setting of MEP for certain commodities. The country had set MEP on Hilsa fish in 2008, which is the most exported fish to India. This measure was adopted to increase the availability and affordability of Hilsa fish in the country. A large proportion of Hilsa fish is known to be informally exported from Bangladesh to India.

2. Domestic Policy Distortions

With the underlying objectives of providing food security and addressing poverty, India's agricultural policies have followed a twin-track approach - keeping food prices low for the consumer (stock holdings for the public distribution system and large food subsidies) and also incentivising production through domestic support (subsidies on inputs and minimum support prices for some products (Hoda and Gulati 2013). Such policies keep prices below the market price and therefore encourage informal trade largely though leakages from the system.

- ***Targeted Public Distribution System (TPDS)***

Through the Targeted Public Distribution System (TPDS) the government provides food grains (wheat and rice), sugar, and other necessary items such as kerosene oil and edible oil to the poor through a network of fair-price ration shops distributing grains annually.

The leakages of grains from Public Distribution System (PDS) in states neighbouring Bangladesh border were quite high in 2009-10 – e.g. 98% in Manipur, 69% in West Bengal, and 61% in Assam (Gulati and Saini, 2015). The widespread PDS leakage, especially in north-east states, is reportedly destined for informal trade channels into Nepal and Bangladesh (USAID and EAT, 2014).

Such inefficiencies of India's PDS appear to be a factor incentivising export via the informal channels. It has been pointed out by Chaudhari (1995) and Taneja and Pohit (2000) that there are leakages from the PDS to neighbouring countries of Nepal and Bangladesh. The main incentive is the massive price advantage that the trader gets by exporting the grain obtained at the PDS prices.

Recently in 2020, custom authorities seized trucks laden with essential food grains (specially wheat) because they were being illegally exported to Bangladesh through the Ghojadanga land port in North 24-Parganas, West Bengal (Chaudhari, 2020).

Commodities like rice, wheat, sugar and edible oils are covered under the PDS system in India and these are in fact highlighted in the previous section (Table 2) as informally exported to Bangladesh.

- ***National Food Security Act (NFSA)***

Under the TPDS, the National Food Security Act (NFSA) was introduced in 2013 which required a significant increase in the food subsidy for maintaining low prices for consumers. The National Food Security Act (NFSA) provides coverage of up to 75% of the rural population and

up to 50% of the urban population for receiving subsidized food grains, thus covering about two-thirds of the population.⁶

As per the WTO Agreement on Agriculture (AoA), a member country cannot export food grains from public stock holdings as they are subsidised grains that can distort international trade.⁷ Banga and Sekhar (2015) suggest that the NFSA makes it further difficult for India to use any public stocks for export purposes. According to the assessment presented in the study, India may, at best, be able to meet the requirements of NFSA from domestic production, with very little exportable surplus.

The large amount of food grains available with public authorities for distribution has further incentivised informal trade through leakages from the system.

- **Minimum Support Price (MSP)**

In addition to TPDS and NFSB, *Minimum Support Price (MSP)* is created as a safety net for farmers, and it also helps to create excess supply of grains (mostly rice and wheat) and increase its availability for the PDS. This may result in grain available for India's formal and informal export with Nepal and Bangladesh (USAID and EAT, 2014).

Currently, MSP scheme is applicable for 22 major agricultural commodities.⁸ Of these items, rice, maize, wheat, pulses, and jute have been found to be traded informally.

3. Regulatory Barriers

There is growing importance of standards in international trade. Often imports of animal and plant products are subject to Sanitary and Phytosanitary measure (SPS) and Technical Barriers to Trade (TBT), and traders prefer to trade informally to avoid these formalities which are cumbersome and also cause delay in the trade.

Plant Quarantine Measures: In India, imports of agricultural items are regulated by the conditions laid down in the Plant Quarantine Order (2003). Under this, the imported items are subjected to pest risk analysis (PRA). Based on the extent of risk, the Order classifies items into different schedules. Schedule VII contains items with lowest risk and therefore do not require a sanitary permit.

One of the major informally traded items in the past is seeds, which faces stringent import requirements in both India and Bangladesh. In India, the Plant Quarantine Order (2003) classifies seeds under the list of permitted imports under Schedule VI with additional declarations and special conditions. For instance, rice and wheat seed can only be imported by National Bureau of Plant Genetic Resources (NBPGR) after testing and evaluation of the seed quality.

⁶ National Food Security Act (2013)

⁷ World Trade Organisation, Agriculture: Food Security Issues

⁸ Press Information Bureau (2022)

In addition, import of seed is governed by the New Policy on Seed Development (1988). Under this regulation, all importers have to make available a small specified quantity of the imported seeds to the Indian Council for Agriculture Research (ICAR) in order to test their resistance to seed/soil borne diseases.⁹

Similarly, plant and plant product import into Bangladesh are governed by the Destructive Insects and Pests Rules, 1966 (Plant Quarantine); and the Plant Quarantine Act (2011).

Under the Plant Quarantine Act (2011), import of plant and plant products that have potential threat to any pest may be prohibited or controlled as per the conditions mentioned in Bangladesh's import policy order. For instance, in case of import of hybrid rice seeds a phytosanitary certificate is required which indicates that the seed is purified with hot water treatment and with approved pesticides.¹⁰

These phytosanitary controls in India and Bangladesh have not been rationalized to focus on quarantinable pests. Consignments are subjected to time consuming procedures and delays which obstruct formal cross-border trade. Informal trade in such items is routine that likely ensures most pests exist on both sides of the border (USAID and EATS, 2014).

The Ghojadanga–Bhomra Border Crossing Point (BCP) imports into Bangladesh are limited to 76 permissible items because the Bhomra land port in Bangladesh has no Bangladesh Standards and Testing Institution (BSTI) establishment. Therefore, it does not admit items that require BSTI certification (Asian Development Bank, 2021).

It must be investigated if the existence of such a requirement and the absence of this facility at the port can act as a barrier to choose the formal channel. For instance, chemical fertilisers, fish, and wheat bran are informally traded and are also covered under both the list of permissible items and the list of mandatory Bangladesh Standards and Testing Institution (BSTI) certification.

Regulation on Fertiliser to Improve Soil Health (Nutrient Based Subsidy Scheme, 2010)¹¹: The Indian government has for several years offered a large subsidy on urea which is the most used fertilizer because of its low price. However, urea creates an imbalance in the soil nutrients because of its high nitrogen content. Even though the Indian government has in recent years provided a subsidy to other fertilizers which have a higher nutrient value (25 grades of P and K fertilizers) prices are decontrolled unlike the case of urea. This has continued to discourage farmers from using more nutrient based fertilizers and urea continues to be a preferred fertilizer. Excessive use is undesirable as it leads to imbalance in fertilizer use, erosion in soil health which in turn, undermines the sustainability of agriculture in the

⁹ Department of Agriculture and Farmers Welfare, Government of India

¹⁰ Import Policy Order 2015-18 of Bangladesh, Bangladesh Customs SRO

¹¹ Press Information Bureau (2022); Ministry of Chemicals & Fertilisers, Department of Fertiliser, Government of India

medium to long-run. Informal trade in urea because of its low price is also likely to have a similar impact in Bangladesh.

4. Institutional and Other Enabling Factors

Institutional factors lie at the core of transaction costs of trading. The inefficiencies of the formal channel related to transportation, infrastructure, and procedures lead to high transaction costs which often deter traders from using the formal channels (Chaudhury 1995; Rahman and Razzaque 1998; Pohit and Taneja 2000; Nath 2012; CUTS International 2018).

In recent years India and Bangladesh have entered into a number of transport agreements such as the bilateral coastal shipping agreement, and the bilateral Protocol on Inland Water Transit and Trade. In addition, the two countries have signed the BBIN Motor Vehicles Agreement which will ensure seamless transportation in the sub-region. Other initiatives include movement of container rail cargo between India and Bangladesh, and multimodal transportation being undertaken by the Container Corporation of India (CONCOR) on rail cum sea routes. Even though the progress has been slow on the ground, it is possible that these changes may have impacted informal trade flows. Listed below are some of the factors that may influence informal trade.

High Transportation Costs: By using the informal routes, traders avoid the high transportation costs of trading on formal routes, since trading routes are currently inefficient, slow, and way more cumbersome. Traders also avoid the procedural delays caused by excessive paperwork required for formal exports. Lower costs of transportation were found to be an important reason for Indians trading informally with Bangladesh (Pohit and Taneja, 2000).

Infrastructure Bottlenecks at Land Customs Posts: The inadequate and poor-quality roads, storage/warehousing facilities, technical and administrative capabilities etc at the border Customs posts (especially on Bangladesh and Nepal borders) result in higher time and transaction costs on these formal routes (Pohit and Taneja, 2000). Nath (2012) shows that infrastructure in and around the Land Custom Stations of Tripura is poor. At all these border crossings, the official land route becomes an unattractive option for traders and they prefer trading informally.

Shorter Time to Reach Destination: Indian informal traders trading with Bangladesh takes lesser time to reach the market. It was found by (Pohit and Taneja, 2000) that it is even possible to meet an order at one day's notice. Several studies also find that traders feel they can get payments much faster by selling informally, often on the same day (Pohit and Taneja, 2000)

Other Enabling Factors: These include cultural, social and ethnic relations (CUTS International, 2018). Ethnic ties play an important role in ensuring that goods move safely and payments are ensured (Pohit and Taneja, 2000). Another reason highlighted by Neogi (2017)

is that Bangladesh farmers face lack of infrastructure investment in seed development and poor post-harvest management. This particularly influences informal trading in rice and other vegetable seeds.

Appendix 1: Items Traded Informally between India & Bangladesh

Following Appendix 1a and Appendix 1b present the list of informally traded agriculture items in the past with their survey locations found in the existing literature.

Appendix 1a: Informal Export of Agriculture Items from India to Bangladesh

Informal Export from India to Bangladesh	Survey Locations	Reference Link
Rice (Mainly Cheap Variety)	Border Districts of West Bengal & Assam	https://bit.ly/3MmUUt2
Pulses - Lentils, Green Gram	Border Districts of West Bengal, Assam, Tripura	https://bit.ly/3MmUUt3
Sugar	Border Districts of West Bengal, Assam, Tripura	https://bit.ly/3MmUUt4
Salt	Border Districts of West Bengal, Assam, Tripura	https://bit.ly/3MmUUt5
Fresh Fruits & Vegetables	Border Districts of West Bengal, Assam	https://bit.ly/3MmUUt6
Edible Oil - Mainly Mustard Oil	Border Districts of West Bengal	https://bit.ly/3MmUUt7
Oilseeds	Border Districts of West Bengal, Assam, Tripura	https://bit.ly/3MmUUt8
Fish (Mainly Ruhi of A.P.)	Border Districts of West Bengal, Assam, Tripura	https://bit.ly/3MmUUt9
Spices & Fruits	Border Districts of West Bengal, Assam, Tripura	https://bit.ly/3MmUUt10
Live Animals - Cow, Bullock, Buffaloes	Border Districts of West Bengal, Assam, Tripura	https://bit.ly/3MmUUt11
Other Baby Food, Milk Powder, Flour, Atta	Border Districts of West Bengal, Assam, Tripura	https://bit.ly/3MmUUt12
Fertilizer	Kishanganj, Siliguri, Jalpaiguri, Falakata (North Bengal Frontier)	https://bit.ly/3rtL6pc
Seed: Vegetable Seeds	Rajshahi	https://bit.ly/3NVjXVM
Paddy	Rangpur	https://bit.ly/3NVjXVM
Tomato	Rajshahi	https://bit.ly/3NVjXVM
Fertilisers	Rangpur	https://bit.ly/3NVjXVM

Informal Export from India to Bangladesh	Survey Locations	Reference Link
Seed: Tomato Seed (Rocky)	Rajshahi	https://bit.ly/3ukWYMB
Seed: Rice Seed (Guti Swarna)	NA	https://bit.ly/3ukWYMB
Fertiliser: Diammonium Phosphate (DAP)	Jessor, Benapole, Rajshahi, Chapainababjanj, Chuadanga	https://bit.ly/3ukWYMB
Fertiliser: Thaiodin	Jessor, Benapole, Rajshahi, Chapainababjanj, Chuadanga	https://bit.ly/3ukWYMB
Machinery: Tractor Parts & Nut Bolts	Jessor, Benapole, Rajshahi, Chapainababjanj, Chuadanga	https://bit.ly/3ukWYMB
Seed: Rice Seed (Swarna)	Jessor, Benapole, Rajshahi, Chapainababjanj, Chuadanga	https://bit.ly/3ukWYMB
Seed: Paddy	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Seed: Onion	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Seed: Jute	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Seed: Vegetable	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Betel nuts	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Mango	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Banana	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Apple	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Guava	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Onion	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Turmeric	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei

Informal Export from India to Bangladesh	Survey Locations	Reference Link
Ginger	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Sugar	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Salt	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Cattle	Petrapole, Bongaon, Madhyamgram, Barasat	https://bit.ly/3xcMtei
Jute Seed	NA	https://bit.ly/3NISSuk
Rice seed (Minikhet)	Bangladesh	https://bit.ly/3y18sWS
Pesticides	NA	https://bit.ly/3bgiYkf , https://bit.ly/3Oyo0H4

Source: Chaudhary (1995), Pohit and Taneja (2000), USAID and EAT (2014), Rahman and Bari (2018), CUTS International (2018; 2021), Ray (2022), Khan (n.d.), Lohia (n.d.)

Appendix 1b: Informal Import of Agriculture Items to India from Bangladesh

Informal Import to India from Bangladesh	Survey Location	Reference Link
Garlic	Kishanganj, Siliguri, Jalpaiguri, Falakata (North Bengal Frontier)	https://bit.ly/3rtL6pc
Seed: Paddy (BR11/BB11)	Malda	https://bit.ly/3ukWYMB
Seed: Paddy (BIRI28/29/Heera)	Cooch Behar	https://bit.ly/3ukWYMB
Fertiliser: Sathi (Herbicide)	Malda	https://bit.ly/3ukWYMB
Machinery: CD Pump	Malda	https://bit.ly/3ukWYMB
Hilsa- fish	West Bengal (District not mentioned)	https://bit.ly/3NhDCid
Seeds for Bitter gourd, Cauliflower, Cucumber	West Bengal	https://bit.ly/3GLhZV0

Source: Das (2014), Hannan (2016), CUTS International (2018), Singh (2015)

Appendix 2: Permissible Import Items through all Land Custom Stations (LCS) of Bangladesh (2022)

Importable Items	Land Custom Station	Negative/Positive List
All goods except Fish, Yarn, Powdered Milk, Sugar and Potatoes, Baggage and Passengers; Baggage of specified weight	Benapole	Negative
All goods, except fish, yarn, powdered milk, sugar and potato, of the following categories only, namely livestock, newly hatched fish, fresh fruits, plants, seeds, wheat, stones & boulders, coal, chemical fertilizers, china clay, wood, timber, limestone, onion, pepper, garlic, ginger, ball clay, diesel (imported by Bangladesh Petroleum Corporation), quartz.	Sirajganj Khulna	Negative
All goods, except fish, yarn, powdered milk, sugar and potato, of the following categories only, namely livestock, newly hatched fish, fresh fruits, plants, seeds, wheat, stones & boulders, coal, chemical fertilizers, china clay, wood, timber, limestone, onion, pepper, garlic, ginger, ball clay, quartz.	Ashuganj	Negative
All goods except Fish, Yarn, Powdered Milk, Sugar and Potatoes, Baggage and Passengers; Baggage of specified weight	Raimangal	Negative
All goods and livestock except fish, yarn, powdered milk, sugar and potatoes.	Tamabil	Negative
All Indian goods except duplex board, newsprint, craft paper, cigarette paper and other paper boards, fish, yan, potatoes, powdered milk, tobacco, radio & TV parts, cycle parts, motor parts, formica sheets, ceramicware, sanitaryware, stainless steel ware, marble slab & tiles, mixed fabrics.	Banglabandha Burimari	Negative
All goods produced and processed in Nepal and Bhutan (except yarn and potatoes) subject to fulfillment of the conditions laid down in National Board of Revenue Notification No. 346/D/Kas/77, dated: 24.05.77. b) Livestock, newly hatched fish, fresh fruits, plants, seeds, wheat, stones & boulders, coal,	Chilahati, Nakugau, Aaricha Ghat, Nunkhawa, Chilmari	Positive

Importable Items	Land Custom Station	Negative/Positive List
chemical fertilizers, china clay, wood, timber, limestone, onions, pepper, garlic, ginger, ball clay, quartz.		
All goods except yarn, powdered milk, sugar and potatoes.	Teknaf	Negative
All goods except duplex board, newsprint, craft paper, cigarette paper and other paper boards, yarn, powdered milk, juice, tobacco.	Hili, Sona Masjid	Negative
Livestock, newly hatched fish, fresh fruits, plants, seeds, rice, wheat, stones and boulders, coal, chemical fertilizers, china clay, wood, timber, limestone, onion, pepper, ginger, garlic, ball clay, quartz, fly ash, sandstone, road stone, dry fish, rape seed extract, maize, soyabean oil, soyabean extract, dry oil rice bran (DORB), deoiled cake (cattle feed).	Rohonpur	Positive
Livestock, newly hatched fish, fresh fruits, plants, seeds, wheat, stones & boulders, coal, chemical fertilizers, china clay, wood, timber, limestone, onions, pepper, garlic, ginger, ball clay, quartz.	Sultanganj, Ramgarh, Rajshahi, Dhamoirhat, Borchhora, Chhatok, Chela, Ichamoti, Bholaganj, Jokiganj, Sheola, Betuli (Fultala), Chatla Pur, Balla, Narayanganj, Cox's Bazar, Biloniya	Positive
Livestock, newly hatched fish, fresh fruits, plants, seeds, wheat, stones & boulders, coal, chemical fertilizers, china clay, wood, timber, limestone, onions, pepper, garlic, ginger, ball clay, quartz, dried fish, satkara, incense sticks, cumin, raw rubber, maize, stones & boulders, soyabean seeds, bamboo products, brooms, betel leaf, CNG spare parts, cashews, paper, sugar, generators, broken glass, chocolate, baby wiper, confectionary items and bitumen.	Akhauda, Koroitoli, Bibir Bazar	Positive
Livestock, newly hatched fish, frsh fruits, plants, seeds, wheat, stones & boulders, coal, chemical fertilizers, china clay, wood, timber, limestone, onions, pepper, garlic, ginger, ball clay, quartz, soyabean extract, rape seed extract, maize, DORB, rice and diesel.	Birol	Positive

Importable Items	Land Custom Station	Negative/Positive List
Livestock, newly hatched fish, fresh fruits, Plants, seeds, wheat, stones (Stones and boulders), coal, chemical fertilizers, china clay, wood, timber, limestone, onion, pepper, garlic, ginger, Ballclay and quartz.	Daulatganj	Positive
<p>a) All goods produced and processed in Nepal and Bhutan (except yarn and potatoes) subject to fulfilment of the conditions laid down in National Board of Revenue Notification No. 346/D/Kas/77, dated: 24.05.77</p> <p>b) Livestock, newly hatched fish, fresh fruits, plants, seeds, rice, wheat, stones and boulders, coal, chemical fertilizers, china clay, wood, timber, limestone, onion, pepper, ginger, garlic, ball clay, quartz, fly ash, sandstone, road stone, dry fish, rape seed extract, maize, soyabean oil, soyabean extract, dry oil rice bran (DORB), deoiled cake (cattle feed).</p>	Rohonpur	Positive
<p>Fish, Yarn, Powdered Milk, Sugar, Potato</p> <p>[Note: Passengers will be able to travel only until infrastructure is developed]</p>	Mujibnagar	Positive
<p>Cattle, Fish Pen, Fresh Fruit, Head, Plants, Seeds, Wheat, Stones (Stones and Boulders), Coal, Chemical Fertilizer, China Clay, Wood, Timber, Limestone, Onion, Pepper, Garlic, Ginger, Ballbrew, Raw cotton, Kachatula, Rice, Lentils, Quartz, Fresh flowers, Khail, Wheat bran, Maize, Rice flour, Soybean cake, Dried fish (except packet), Turmeric, Live fish, Frozen fish, Betel nut, Fenugreek seeds, Fish, Sugar, Masala, Cumin, Motor Parts, Stainless Steelware, Radio & TV Parts, Marble Slabs, Copper Data (imported as raw material by established musak registered beedi producing industries), Dry Tamarind, Alum, Aluminum Tableware & Kitchenware, Fish feed Agarbatti, shoe sole, dry cool, adhesive, fly ash, fresh and dry fruits, all types of fresh vegetables, dry chilies, green chilies, coriander, all types of hair, fire</p>	Bhomra	Positive

Importable Items	Land Custom Station	Negative/Positive List
clay, thin clay, sand stone, Merkel chips, dolomite, phlogopite, Talc, potash filler, granulated slag, soda powder, sesame, mustard, ready-made garments, imitation jewellery, betel, hardware and granite slabs.		
Cattle, Fish Pen, Fresh Fruits, Plants, Seeds, Wheat, Stones and boulders, Coal, Chemical Fertilizer, China Clay, Wood, Timber, Limestone, Onion, Pepper, Garlic, Ginger, Blackclay, Quartz , Rice, husk, corn, various types of khail, pastry feed, fly ash, railway slipper, building stone, red stone, sand stone, various types of clay, granulated slag, gypsum, sponge iron, pig iron, clinker, quartz, Raw cotton and cotton bales. [Note: Until infrastructure is developed, only import-export can be done by rail.]	Darshana	Positive
a) Products containing imported goods as per National Board of Revenue Notification No. 149/2018/Customs/150, dated: 10.04.2018. b) non-containerized bulk and break-bulk goods imported as per National Board of Revenue Notification No. 69/2020/Customs/262, dated: 25.11.2020.	Muktarpur (Summit Alliance Port Ltd.)	Positive
Lafarge Surma Cement Factory imports raw material for manufacturing limestone, siltone and shale.	Noarai	Positive

Source: National Board of Revenue Customs SRO, Bangladesh, Notification Date: February 16, 2022

Note: All exports are permissible from all the LCS in Bangladesh

Appendix 3: Summary of Domestic/trade policies and other Regulations Imposed on Agriculture Items Traded Informally Between India & Bangladesh

The following tables summarise domestic/trade policies and other regulations that have sporadically been implemented in India and Bangladesh on agriculture goods that are traded informally.

Appendix 3a: Commodities Subject to Domestic/trade policies and other Regulations in India

Items Traded Informally	Policies/Regulations in India
Sugar	<ul style="list-style-type: none"> • Targeted Public Distribution System (TPDS): Sold at subsidised price • Prohibition/Restriction: <ul style="list-style-type: none"> 2013: Export ban Imposed; 2014: Export ban removed but prior registration of quantity with DGFT is required; 2017: Quantity restriction of 0.50 lakh MT through Haldia Port (West Bengal) – import was allowed only through Haldia port (in the east zone of India) 2017: Exports of organic sugar is allowed from all EDI (electronic data interchange) ports 2022: Export ban on sugar from June 2022 to October 2022 • Export Policy: <ul style="list-style-type: none"> 2013: Export subsidy is provided since 2013 2014: Export and import via State-trading since 2014- Export permitted through Indian Sugar Exim Corporation Limited subject to quantitative ceiling notified by DGFT from time to time.
Edible oils	<ul style="list-style-type: none"> • TPDS: Sold at subsidised price • Prohibition/Restriction: <ul style="list-style-type: none"> 2008: Export of edible oil allowed only in branded packs up to 5 kg. 2017: Restriction on bulk export of groundnut oil, sesame oil and maize oil lifted, up to 5 kg subject to Minimum Export Price • Exemption: <ul style="list-style-type: none"> 2017: Exports of organic edible oil allowed from all EDI (electronic data interchange) ports
Wheat	<ul style="list-style-type: none"> • TPDS: Sold at subsidised price • 2007 to 2011; and again in 2022: Export Ban • Registration of quantity of export through non-EDI LCS <ul style="list-style-type: none"> ○ Exports are permitted only through Custom EDI ports But exports are subjected to registration of quantity through non-EDI LCS
	<ul style="list-style-type: none"> • TPDS: Non-basmati rice sold at subsidised price

Items Traded	Informally	Policies/Regulations in India
Rice		<ul style="list-style-type: none"> • Export Policy: <ul style="list-style-type: none"> ○ 2007 to 2011: non-basmati rice was banned ○ 2008 to 2012: Basmati rice carried an export duty and a MEP; Export of basmati rice requires quality control and pre-shipment inspection • Registration of quantity of export through non-EDI LCS <ul style="list-style-type: none"> ○ Exports are permitted only through Custom EDI ports But exports are subjected to registration of quantity through non-EDI LCS
Pulses		<ul style="list-style-type: none"> • 2010: Prohibition on export of pulses • 2011: Export of Organic Pulses subject to conditions such as quantity restriction, it should be certified and approved by APEDA, exports are allowed through Customs EDI-enabled port only • 2012: Extension of export prohibition till 2016 • 2016: Only export of Roasted Gram in consumer packet up to 1 kg is permitted to export • 2017: All varieties of pulses including organic pulses were allowed to export through Customs EDI ports. However, export through Indo-Bangladesh & Indo-Nepal was allowed subject to quantity registration with the DGFT. • 2020: Restriction on import of pulses • 2022: Moong bean pulse – restriction on import
Onions		<ul style="list-style-type: none"> • Since 2019: Export of all varieties of onions will be allowed only on Letter of Credit subject to a Minimum Export Price (MEP) of US\$ 850 FOB • 2022: Onion seeds has been put under “restricted” category
Fish		<ul style="list-style-type: none"> • 2008: Tariff concessions for imports from enumerated LDCs implemented • 2018: Duty drawback increased on exports of fish implemented • 2021: Relief in export obligation for certain exporters implemented

Source: Department of Food & Public Distribution, GoI; APEDA, MoC&I, GoI; ICAR-National Bureau of Plant Genetic Resources; Global Trade Alert Database

Appendix 3b: Commodities Subject to Domestic/trade policies and other Regulations in Bangladesh

Items traded	Informally	Policies/Regulations in Bangladesh
Sugar		<ul style="list-style-type: none"> • 2015: Regulatory duty imposed on sugar imports In case of refined sugar, import duty is higher than raw sugar Import duty on sugar was imposed as a protection for domestic suppliers in times of falling global prices of sugar

Items traded	Informally	Policies/Regulations in Bangladesh
		<ul style="list-style-type: none"> As per Export Policy Order 2018-21, Sugar is under the list of conditional export items
Rice		<ul style="list-style-type: none"> 2008 to 2015: Export ban on rice 2015: Aromatic rice under the list of conditional export 2019: Increase in regulatory duties 2020 to 2021: Import duty on rice slashed to 25% from 2020 to 2021 to increase reserves and lower global rice prices (<i>liberalising policy</i>) 2021: Further reduction in import duty of rice to 15% and waiver in regulatory duty to stabilise supply and price of rice domestically in 2021
Fish		<ul style="list-style-type: none"> 2007: Temporary import ban on Hilsa fish 2008: MEP on Hilsa Fish 2012: Ban on export of hilsa fish to markets in India, UK and USA due to its depleting resources 2015: Hilsa Fish is under the list of products under conditional export (still present in the list as per the export order 2021-24) 2019: Import ban was lifted temporarily in 2019 for the government to earn tax revenue through formal channel
Refined Edible Oil		<ul style="list-style-type: none"> Import Ban: Mustard oil faces import ban Export Prohibition: Soybean and Palm oil are categorised under the export-prohibition list Regulatory Barrier: Importable refined edible oil must conform to the quality standard of the exporting country and to the standard of BSTI valid
Jute		<ul style="list-style-type: none"> Special allocations given to jute mill owners to restart state-owned mills Subsidy on jute exports As per Export Policy Order 2018-21, Jute is under the list of export-prohibited products Technical regulations on jute import – any person who wants to import jute should be licensed and a prescribed fee
Onions		<ul style="list-style-type: none"> 2021: Following India's ban on onion exports, import tariffs were levied on onion trade with the country in 2021 As per Export Policy Order 2018-21, Onions is under the list of export-prohibited products
Pesticides		<ul style="list-style-type: none"> Pesticides face technical barriers to trade (TBT): The Bangladesh government requires every package to be labelled with warning and cautionary statements for poisonous substance. The label should also be printed in Bengali. The brand of the pesticide should be registered with the Bangladesh authorities; a fee is also charged for import grant.
Fertiliser		<ul style="list-style-type: none"> Urea fertilizer, except for that produced by KAFCO, needs prior approval by Ministry of Industries; the importer of fertiliser should be a member of Bangladesh Fertilizer Association

Items traded	Informally Policies/Regulations in Bangladesh
	<ul style="list-style-type: none"> ● Fertilizer should be importable only from the manufacturer or from his representative ● There is a guaranteed percentage for the lower limit for nitrogen, phosphate, and potash for a plant nutrient to be present for the product to be considered as fertilizer.

Source: Export Policy Order of Bangladesh 2018-21; Import Policy Order of Bangladesh 2015-18; The Pesticides Rules, 1985; Fertilizer Management Rules, 2007; Global Trade Alert Database

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