

POLICY BRIEF

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UK DCTS Rules of Origin Changes and Implications for Bangladesh's Post-LDC Apparel Competitiveness

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Summary of key findings and implications: The changes introduced by the UK to rules of origin within the Developing Countries Trading Scheme (DCTS), particularly the move to single-stage transformation for apparel under Enhanced Preferences, have critical importance in shaping post-LDC export performance of Bangladesh in the UK market. Given its heavy reliance on apparel exports and limited domestic capacity in woven fabrics, restrictive origin requirements would have significantly constrained Bangladesh's effective market access, even where duty-free treatment formally applies.

- Partial equilibrium estimation using highly disaggregated product level data indicate that, under double-transformation rules, Bangladesh would have lost £225–280 million annually in apparel exports; the shift to single-stage transformation effectively averts these losses.
- General equilibrium simulations considering interlinked sectors and global economies reinforce this finding. When Bangladesh retains single-stage transformation, competitive pressure from UK trade agreements with major apparel exporters such as India and Viet Nam leads to only marginal export displacement. By contrast, imposition of double-transformation requirements would reduce Bangladesh's apparel exports to the UK by more than 25 per cent.
- In value terms, the policy change is estimated to reduce potential apparel export losses of Bangladesh from £936 million (US\$1.18 billion) to £119 million (US\$150 million). The resultant employment implications are substantial, with close to 100,000 jobs, over half held by women, estimated to be safeguarded.

Overall, the evidence suggests that the UK's DCTS approach supports a smooth post-LDC transition, preserves supply-chain continuity for UK businesses, and aligns with international commitments to development-supportive graduation.

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I. Background

Effective from 1 January 2026, the UK Government introduced some changes to the Developing Countries Trading Scheme (DCTS), aimed at strengthening its development effectiveness while supporting more resilient and diversified supply chains for UK businesses and consumers. These revisions are particularly relevant in the context of Least Developed Country (LDC) graduation, a process that often entails an abrupt loss of trade preferences and associated adjustment pressures for graduating economies. The UK's approach reflects an explicit policy intent to facilitate a smoother transition for such countries, while maintaining continuity and predictability in sourcing relationships.

A central element of the changes in rules of origin is related to apparel under the Enhanced Preferences tier of the DCTS. Rules of origin determine how much production must take place within a beneficiary country for goods to qualify for preferential market access. In the case of apparel, the shift to a single-stage transformation requirement means that beneficiary countries can source fabric inputs from global markets and still export finished garments to the UK duty-free, without having to undertake both fabric production and garment assembly domestically. In practical terms, this reduces compliance costs and aligns preference rules more closely with the realities of modern, globally fragmented apparel supply chains.

This change is particularly significant for Bangladesh, which is set to graduate from LDC status and whose export profile is heavily concentrated in ready-made garments. Apparel accounts for the overwhelming majority of Bangladesh's exports to the UK, making the country one of the UK's largest clothing suppliers. Without flexibility in rules of origin, LDC graduation would expose a large share of these exports to standard tariffs, potentially disrupting established trade relationships and increasing costs for UK importers and consumers. By extending single-stage transformation to enhanced preference countries, the revised DCTS effectively preserves preferential access for Bangladesh's apparel exports beyond graduation, safeguarding continuity in bilateral trade.

Against this backdrop, this policy brief examines how the revised rules of origin under the UK's DCTS impact Bangladesh's export competitiveness in the UK market. It pays particular attention to the interaction between rules of origin, LDC graduation, and emerging competitive pressures from other major apparel exporters that are now benefitting from UK trade agreements. The analysis combines product-level and economy-wide modelling approaches to assess both direct trade effects and broader adjustment dynamics, providing an evidence-based assessment of the implications of the UK's policy choice.

II. Recent Changes in the UK Developing Countries Trading Scheme (DCTS)

The UK's DCTS, introduced on 19 June 2023, replaced the UK Generalised Scheme of Preferences with the explicit objective of offering a more development-focused, transparent, and predictable preference framework. In design terms, the DCTS is among the most generous unilateral preference schemes globally, differentiating between beneficiary countries based on income level and vulnerability, while tailoring market access accordingly.

Under the scheme, LDCs benefit from duty-free and quota-free access on almost all goods, excluding arms, under the Comprehensive Preferences tier. Economically vulnerable non-LDC low-income and lower-middle-income countries qualify for Enhanced Preferences, receiving duty-free access on approximately 92 per cent of tariff lines, with reduced tariffs on the remainder. Other low-income and lower-middle-income countries fall under the Standard Preferences tier, which provides duty-free access on around 65 per cent of product lines. This tiered structure allows the UK to calibrate trade preferences in line with development needs while maintaining incentives for graduation and reform.

Rules of origin play a central role in determining whether exports can actually utilise these tariff preferences. They specify the minimum level of processing or value addition that must take place within a beneficiary country for goods to qualify for preferential treatment. Prior to the recent reform, the requirements differed sharply across tiers. LDCs were permitted to export apparel under a single-stage transformation rule, meaning that assembling garments from imported fabric was sufficient to qualify for preferences. By contrast, countries under the Enhanced and Standard Preferences tiers were required to meet a double-transformation rule for apparel, effectively requiring both fabric production and garment assembly to take place domestically. For non-apparel products, Enhanced and Standard Preference countries also faced a higher value-addition threshold of 50 per cent, compared to 25 per cent for LDCs.

The recent reform has liberalised rules of origin specifically under the Enhanced Preferences tier. Eligible countries are now allowed to source up to 100 per cent of apparel inputs from abroad, undertake fewer mandatory processing stages, and still qualify for duty-free access to the UK market. In practical terms, this brings the origin requirements for enhanced preference countries much closer to those previously enjoyed by LDCs, particularly in sectors characterised by fragmented global supply chains such as apparel.

This adjustment would reduce the risk of preference erosion following LDC graduation. It allows countries such as Bangladesh to maintain competitive access to the UK apparel market during and after the transition period, without forcing an abrupt and potentially disruptive restructuring of production processes. At the same time, the reform supports continuity and reliability in UK apparel sourcing, limiting sudden shifts in suppliers that could otherwise raise costs for importers and consumers. In this sense, the change reflects a balanced trade policy choice, one that advances

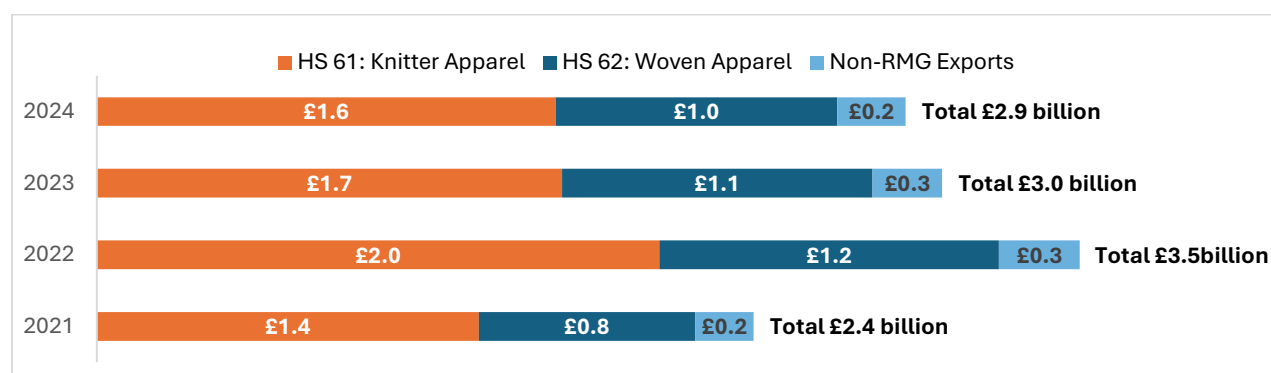
development objectives while reinforcing supply-chain resilience and predictability for the UK economy.

The changes in rules of origin provisions also assume particular importance in light of the UK's expanding network of free trade agreements with countries possessing large-scale, efficient, and deeply integrated supply-side capacities, for example, India and Viet Nam. In the absence of more flexible origin rules under the DCTS Enhanced Preferences, post-LDC countries such as Bangladesh would face a sharply altered competitive landscape, where nominal duty-free access would coexist with binding compliance constraints, while FTA partners benefit from both tariff elimination and stronger domestic backward linkages. Such an outcome could have the unintended effect of rendering LDC graduation economically punitive, with successful graduates effectively penalised through a sudden erosion of market access conditions, despite no deterioration in underlying competitiveness. This would sit uneasily with the long-standing commitment of UN members, including the UK, to ensure a smooth and development-supportive transition for graduating LDCs, recognising that preference withdrawal should be gradual, predictable, and aligned with the realities of production structures rather than a cliff-edge adjustment driven by technical rules.

III. Implications for Bangladesh

The UK is Bangladesh's third-largest export destination, after the European Union and the United States, accounting for around 10 per cent of the country's total merchandise exports. These exports are overwhelmingly concentrated in apparel, which represents more than 90 per cent of Bangladesh's shipments to the UK, making Bangladesh the second-largest supplier of clothing to the UK after China.

In 2024, UK apparel imports from Bangladesh were valued at approximately £2.6 billion (\$3.3 billion), comprising £1.6 billion (\$2.01 billion) in knitwear and £1.0 billion (\$1.3 billion) in woven garments. This composition matters analytically. Bangladesh's knitwear segment benefits from relatively stronger domestic backward linkages, allowing higher local value addition and easier compliance with origin requirements. On the other hand, woven apparel production remains heavily dependent on imported fabrics, reflecting long-standing structural gaps in upstream textile capacity. As a result, woven exports are particularly vulnerable to restrictive rules of origin that require multiple stages of domestic processing.

Figure 1: Bangladesh's exports to the UK, 2021 to 2024

Source: Office of National Statistics (ONS), UK (2026).

This structural asymmetry explains why rules of origin are a binding determinant of competitiveness for Bangladesh. Under a double-transformation requirement, a substantial share of woven apparel exports would fail to qualify for preferential access, even if headline tariff rates were zero. In practice, this would expose exporters to standard UK tariffs, eroding price competitiveness and potentially triggering a reallocation of orders to suppliers better able to meet stringent origin thresholds. By contrast, a single-stage transformation rule allows Bangladesh to continue exporting garments assembled from imported fabrics without incurring this implicit tariff penalty.

The extension of single-stage transformation to Enhanced Preference countries therefore has direct implications for Bangladesh in the context of its forthcoming LDC graduation. It preserves effective duty-free access for the most vulnerable segments of Bangladesh's apparel exports and significantly reduces the risk of abrupt trade losses driven by preference rules rather than underlying productivity or cost competitiveness. At the same time, it shapes Bangladesh's relative position vis-à-vis other major apparel exporters, particularly those that may gain tariff-free access to the UK through future free trade agreements but remain subject to more demanding origin requirements.

IV. Quantifying the potential implications for Bangladesh

To quantify the trade effects of the revised rules of origin, the analysis employs both partial equilibrium and computable general equilibrium (CGE) modelling approaches. Partial equilibrium analysis considers the directly affected products individually, ignoring interactions across other products or markets. In contrast, general equilibrium models can capture simultaneous interactions across all markets and products. The CGE framework of the most widely used Global Trade Analysis Project (GTAP) model provides economy-wide adjustments in production, consumption, trade, welfare, and factor returns while at the same time capturing similar impacts for global economies (Hertel, 1997).

Partial equilibrium results

The partial equilibrium analysis is implemented using the WITS-SMART framework, a widely used trade simulation tool that calculates how changes in trade policy translate into import demand

responses at the product level. In this context, the model is used to estimate the implicit tariff cost that Bangladeshi exporters would face if restrictive rules of origin prevent certain apparel products from qualifying for preferential access, despite nominally zero tariffs under the DCTS.

In operationalising the simulations, knitwear products are assumed to be able to meet double-transformation requirements, while woven apparel products are assumed to face binding constraints under a double-transformation regime.¹ Consultations with industry stakeholders suggest that, at present, no more than 15–20 per cent of Bangladesh’s woven fabric requirements can be sourced domestically. Reflecting this, the analysis assumes that only 20 per cent of woven apparel exports to the UK would have been able to qualify for duty-free access under the previous double-transformation rules of origin, with the remaining share effectively subject to standard MFN tariffs. Based on this assumption, product-specific tariff rates are applied to the affected portion of exports when implementing the partial equilibrium model.

The results indicate that, under double-transformation rules, Bangladesh would have incurred annual apparel export losses in the range of approximately £225 to £280 million (equivalent to about \$283 to \$350 million). The introduction of single-stage transformation effectively averts these losses by removing what is, in practice, an “origin-induced tariff”, namely the implicit cost exporters would otherwise face when failing to comply with restrictive origin requirements. In proportional terms, the avoided losses, which can also be considered as gains to exporters, amount to around 8.6 to 10.7 per cent of Bangladesh’s total apparel exports to the UK. As the effects are concentrated in woven garments, the corresponding impact at the segment level is substantially larger, equivalent to approximately 22 to 28 per cent of Bangladesh’s woven apparel exports to the UK. The top ten woven product categories, which together account for around 76 per cent of these avoided losses, are presented in Table 1.

Table 1: Top ten products with positive gain

HS Code	Product name	Avoided losses (gains for exporters) (million £)
620342	Men’s cotton trousers/shorts	46.1 to 57.6
620462	Women’s cotton trousers/shorts	39.0 to 48.8
620520	Men’s cotton shirts	23.2 to 29.0
620343	Men’s synthetic trousers/shorts	17.2 to 21.5
620463	Women’s synthetic trousers/shorts	10.5 to 13.1
620530	Men’s synthetic shirts	8.5 to 10.6
620640	Women’s synthetic blouses/shirts	8.4 to 10.5
620469	Women’s trousers/shorts (other)	6.8 to 8.5
621210	Brassieres	7.0 to 7.1
620333	Men’s synthetic jackets/blazers	5.0 to 6.2

Source: Authors’ analysis using WITS–SMART simulations. The results are based on 2023 trade data reported in US dollars and converted to pounds sterling using the 2023 average exchange rate.

¹ That the woven products have a very low level of domestic value addition has been widely discussed. Frederick & Staritz (2012) found 12–15 per cent of woven textiles were sourced locally, while Habib (2016) and Masum (2016) report 15–40 per cent.

Computable General Equilibrium (CGE) Results

The CGE framework based on the GTAP model can simulate how an economy responds to policy changes, allowing prices, production, trade flows, income, and factor allocation to adjust simultaneously across sectors and countries. In practical terms, this approach makes it possible to assess how changes in rules of origin affect not only Bangladesh's apparel exports to the UK, but also the export performance of other major suppliers.² Two simulation scenarios are considered using this model:

- **Scenario 1—Before the changes in DCTS textile and clothing rules of origin:** Bangladesh is assumed to receive Enhanced Preferences under the DCTS but remains subject to double-transformation rules of origin for textile and clothing exports. At the same time, the UK's bilateral trade relationships with major apparel suppliers are maintained, including free trade agreements with India and Viet Nam, under which both countries enjoy tariff-free access to the UK market while complying with double-transformation requirements.
- **Scenario 2—After the changes in DCTS textile and clothing rules of origin:** Bangladesh, under DCTS Enhanced Preference, is assumed to benefit from single-stage transformation rules for textile and clothing exports. All other trade relationships remain unchanged relative to Scenario 1, including tariff-free access for India and Viet Nam under double-transformation rules. This scenario isolates the effect of the revised DCTS rules of origin while holding other competitive conditions constant.

In implementing the GTAP simulations, global goods and services trade is aggregated into 15 sectors, with trade flows represented across 16 countries or regions. For the purposes of this analysis, Bangladesh's woven apparel exports are assumed not to meet double-stage transformation rules of origin. As a result, woven apparel exports to the UK are modelled as facing MFN tariffs, while knitted apparel exports continue to enter duty-free.³ All other aspects of Bangladesh's trade with third markets remain unchanged, including duty-free access under arrangements such as the European Union's Everything But Arms scheme. The simulation designs consider that India's apparel industry benefits from its well-established domestic backward linkages and is therefore able to meet the rules of origin, allowing it to nearly full utilisation of tariff-free access. By contrast, Viet Nam's textile sector exhibits lower domestic value addition, estimated at below 30 per cent of gross output (Razzaque et

² In addition to trade flows, the GTAP-based computable general equilibrium framework captures the broader economy-wide effects of policy changes, including impacts on national income, factor returns, employment, and overall economic welfare. Because the model represents all major sectors of the economy and their interlinkages, it allows changes in export performance to transmit through input-output relationships, affecting non-export sectors, household incomes, and consumption patterns. The GTAP framework is built on an internally consistent and integrated global database that combines bilateral trade flows, production structures, consumption, and protection data across countries and sectors. This structure ensures that adjustments in one part of the economy, such as apparel exports, are reflected in resource reallocation, price changes, and welfare outcomes elsewhere, providing a comprehensive assessment of both direct and indirect effects of trade policy changes.

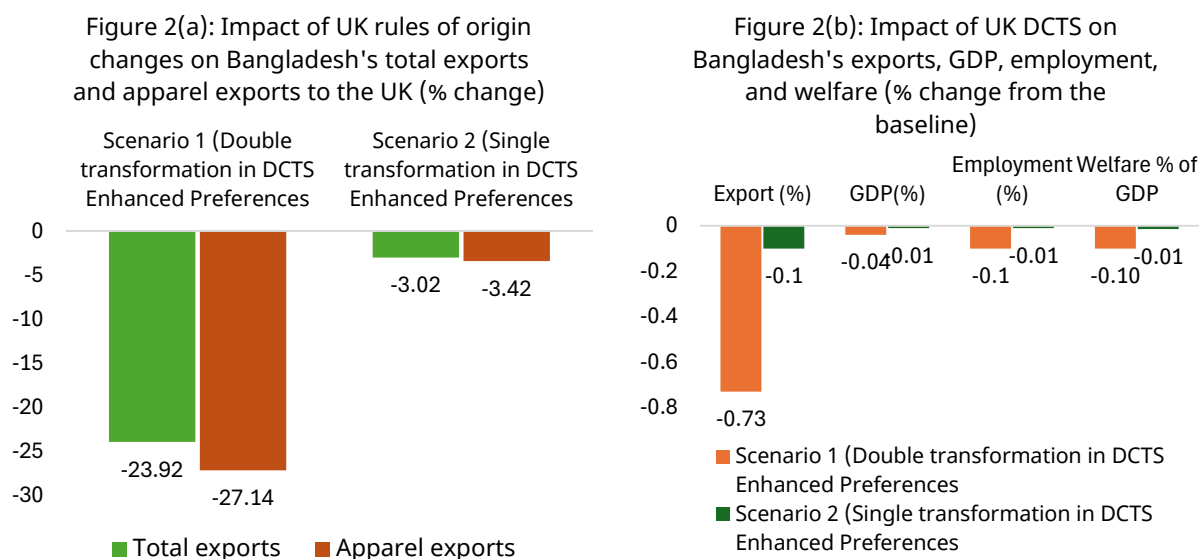
³ Since GTAP reports tariffs as trade-weighted averages, a weighted tariff measure reflecting the distinction between woven and knitted exports is constructed for the UK market.

al., 2024), which constrains its ability to fully utilise the benefits of tariff-free access under the free trade agreement with the UK.⁴

The simulations show that under Scenario 1, where India and Viet Nam gain tariff-free access to the UK under trade agreements while Bangladesh faces double-transformation requirements for duty-free access after LDC graduation, the results are stark. Bangladesh's total exports to the UK decline by nearly 24 per cent, while apparel exports fall by around 27 per cent (Figure 2(a)). This reflects the binding nature of double transformation for Bangladesh's woven apparel in particular. In effect, preferences exist on paper, but a large share of woven garments is priced out of the UK market facing the full MFN tariff due to lack of origin-related compliance.

The picture changes remarkably under **Scenario 2**, once single-stage transformation is applied under DCTS Enhanced Preferences benefiting Bangladesh, while India and Viet Nam enjoy tariff-free access under their respective free trade agreements with the UK. At this, export losses incurred by Bangladesh become much smaller and contained, with total exports declining by just 3 per cent and apparel exports by 3.4 per cent (Figure 2(a)). These remaining modest declines largely reflect competitive pressures from other suppliers, including India and Viet Nam, rather than origin constraints. The contrast between the two scenarios clearly shows that the bulk of the losses observed in Scenario 1 are avoided once rules of origin are relaxed. In other words, the shift to single transformation may not create new exports for Bangladesh, but it prevents very large losses that would otherwise materialise, especially in apparel.

Figure 2: Impact of UK DCTS rules of origin changes on Bangladesh



Source: Authors' analysis based on GTAP simulations.

⁴ The underlying GTAP simulations account for these differences by incorporating non-tariff barrier (NTB) effects on apparel exports, applying a 2 per cent adjustment for India and a larger 5 per cent adjustment for Viet Nam, even where tariff-free market access is assumed.

Figure 2(b) captures brief economy-wide implications for Bangladesh arising from the two scenarios. It shows that while export effects are relatively sizeable, the broader macroeconomic impacts on GDP, employment, and welfare are small. This is attributable to the fact that the share of exports in Bangladesh's GDP is about 13 per cent while the UK accounts for just about one-tenth of the country's exports receipts. These results also indicate that the primary adjustment pressure from restrictive rules of origin is concentrated in the export sector, rather than across the wider economy.

Based on Bangladesh's exports to the UK in FY25, it can be estimated that, in the absence of a shift to single-stage transformation, Bangladesh's apparel exports to the UK could have declined by around £936 million (US\$1180 million). With single-stage transformation in place, the projected export loss is substantially smaller, at approximately £119 million (US\$150 million). The difference between these two outcomes can therefore be interpreted as the net benefit for Bangladesh associated with the UK's decision to allow single-stage transformation.

The implications extend beyond trade values. According to Bangladesh's Labour Force Survey 2024, the export-oriented apparel sector directly employs around 3.7 million workers (BBS, 2025). Using average export earnings per worker as a benchmark, the preservation of single-stage transformation for Bangladesh is estimated to have safeguarded close to 100,000 jobs (more precisely, 97,189). Importantly, just over half of these jobs are held by women. This outcome carries particular significance in the Bangladeshi context, where recent years have seen declining female participation in manufacturing, including in the apparel sector (Razzaque et al., 2025).⁵ By supporting Bangladesh's apparel exports without being affected by stringent origin requirements, the DCTS policy change contributes not only to trade continuity but also to employment stability, with significant gender dimensions.

V. Policy Implications

The analysis including the modeling results point to a clear set of policy implications regarding the role of rules of origin in shaping effective market access, post-LDC transition risks, and competitive dynamics in the UK apparel market.

- **Rules of origin are a critical determinant of effective market access and post-LDC transition outcomes.** The analysis shows that, particularly for woven garments, rules of origin matter at least as much as tariff rates. Allowing single-stage transformation under Enhanced Preferences substantially reduces the risk of abrupt export losses following LDC graduation,

⁵ Over the past decade, women's share in Bangladesh's manufacturing employment fell from about 40 per cent to less than 25 per cent. The decline has been widespread across manufacturing, including apparel, textiles, food, tobacco, pharmaceuticals, etc., with women's share in apparel alone falling to less than 40 per cent by 2024, reflecting rising automation and capital intensity that have disproportionately displaced female workers.

supporting a smoother and more predictable adjustment rather than a disruptive cliff-edge transition.

- **Origin flexibility significantly moderates competitive pressures arising from UK FTAs.** When Bangladesh retains flexible rules of origin, tariff-free access for competitors such as India and Viet Nam generates only limited displacement effects. By contrast, stringent origin requirements combined with FTA-driven tariff preferences would sharply amplify export losses, well beyond the effects of tariff competition alone.

- **The approach strengthens UK supply-chain continuity and resilience.** By reducing the risk of sudden sourcing shifts, the DCTS change supports stable supplier relationships for UK retailers and helps limit cost pressures for businesses and consumers.

- **The employment and gender effects reinforce the development rationale for DTTS rules of origin changes.** Preserving effective market access is associated with significant employment retention in Bangladesh's apparel sector, with a particularly strong impact on female employment.

- **The UK decision sets a constructive benchmark for post-LDC trade engagement.** The DCTS experience provides a credible reference point for engagement with other partners, notably the European Union, where Bangladesh faces stricter origin rules despite accounting for nearly half of its exports.

- **Origin flexibility should be viewed as a transition instrument, not an endpoint.** While single-stage transformation supports a softer landing after LDC graduation, sustained competitiveness will ultimately depend on Bangladesh strengthening its domestic textile base and backward linkages. Continued investment in competitive upstream industries will be critical to raising domestic value addition, improving resilience, and reinforcing the long-term competitiveness of Bangladesh's apparel sector in global markets.

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