

BANGLADESH TRIP REPORT

Name/Title:Kent D. SissonActivity #:10 (2020 UES)Activity:Food & Feed Safety Assessment TripBegin date:January 29, 2020Destination:Dhaka, BangladeshEnd date:February 5, 2020

Budget: \$53,000

PURPOSE OF TRAVEL:

To conduct an assessment of the legislative and regulatory situation for food and feed safety with the following objectives:

- 1. Determine the status of the Government of Bangladesh's (GOB) efforts in developing and implementing science-based food and feed safety laws and regulations and determine what role if any, FAEA can play in assisting the GOB
- 2. Identify existing organizations as well as resources and programs currently being used to assist the GOB in the food and feed safety arena
- 3. Identify and interview potential contractors to hire for assisting FAEA in implementing its program and activities in Bangladesh, if needed

OBSERVATIONS:

All three of the above objectives were met.

- 1. The GOB, led by the Bangladesh Food Safety Authority (BFSA established in 2015), has started implementing its Food Safety Law (passed in 2013) but is not yet fully staffed and needs technical assistance and education support in implementing the law and relevant regulations. My conclusion is that FAEA can provide assistance that fills some gaps where specific technical expertise is needed.
- 2. The GOB is already receiving substantial assistance from USAID (under its Feed the Future Program), USDA, FAO, U.S. universities (e.g., Kansas State, Cornell and Purdue), other Non-Government organizations, and private sector companies. Rather than initiate "stand alone" FAEA activities, I believe the most efficient and cost effective way for FAEA to engage and assist is to develop partnerships with one or more of the existing capacity building organizations to collaborate on activities that are of mutual interest to FAEA and those organizations.
- 3. FAEA will need a contractor (either a firm or an individual) in Dhaka to gather and analyze information and submit reports on food and feed safety developments as well as assist in implementing FAEA technical assistance, education and travel (for consultants to Bangladesh and teams from Bangladesh) activities. I interviewed two prospective candidates and sent follow up requests to provide a quote for their services.



RECOMMENDATIONS:

- 1. Collaborate with the International Development Group (IDG) to provide technical assistance expertise and funding resources in conjunction with the activities that they are implementing under USAID's Feed the Future program. FAEA will formalize the relationship with IDG by signing an MOU with IDG.
- 2. Hire a contractor to provide food and feed safety intelligence gathering, analysis and reporting on a monthly and "alert" basis as well as assist in arranging logistics for consultant and FAEA travel to the country, Bangladesh team travel to the U.S. or other countries, Bangladesh delegates to Codex committee meetings, and technical seminars/workshops/events in Bangladesh.
- 3. Strengthen relationships with capacity building organizations (e.g., USDA/FAS, USAID, FAO, U.S. universities, and others) that are already present and assisting the GOB with food and feed safety programs.

Signature:

Kent D. Sian

Date: April 3, 2020



ITINERARY

Arranged by the Office of Agricultural Affairs U.S. Embassy Bangladesh

Schedule for the Executive Director Food and Agriculture Export Alliance Visit to Dhaka January 31-February 5, 2020

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Friday, January 31

10:30 am Arrival in Dhaka from U.S. Met at the airport by Muhammad Rafiq Islam from

FAS Dhaka and Interpreter Mahfuz

1:00 pm Arrive at Westin Hotel

Saturday, February 1

9:00 am -

1:00 pm Prepare for meetings

- Read up on food safety situation
- Prepared questions for meetings
- Prepared notes for FAEA presentation to USSEC team

14:00 pm Meet with USSEC – Country Strategy Session in Westin

18:00 pm Dinner with USSEC team

Sunday, February 2

08:30 am	Depart Westin Hotel
09:00 am	Export Credit Guarantee Seminar held at Embassy Annex
10:00 am	Depart Seminar for National Food Safety Day 2020
11:00 am	Food Safety Day Seminar held at Engineers Institution of Bangladesh (IEB)
12:30 pm	Departed Seminar for Bangladesh poultry producers association
14:00 pm	Meeting with Bangladesh Poultry Industries Association (BPIC)
15:30 pm –	
17:00 pm	Visit modern and traditional supermarkets in Dhaka to see variety, quality, and
	prices of products represented by FAEA members (poultry, beef, dairy products)
18:00 pm	Return to hotel
19:00 pm	Dinner reception with USSEC team, U.S. Ambassador Earl R. Miller, FAS Dhaka
	and Washington staff, and other Embassy officials

Monday, February 3

08:20 am Depart Westin for meetings with FAS, FAO, USAID, BAFIITA, Ministry of

Agriculture, and IDG

Note: USDA will joined all meetings

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08:30 am Breakfast meeting with FAO at Atrium, US Embassy

John Taylor, FAO Chief Technical Advisor Dhaka Food Safety Project Kulsum Begum Chowdhury

National Value Chain and Consumer Studies Specialist

Dhaka Food Safety Project

10:00 am Meeting with USAID Staff in the Economic Growth Office

Dr. Osagie Christopher AimiuwuDeputy Director – Feed the Future

Mr. Anar Khalil

Deputy Team Leader – Feed the Future

MD. Mehedi Hasan

Project Management Specialist

11:00 am Depart Embassy for BAFIITA meeting

12:00 pm Meeting and lunch with Bangladesh Agro Feed Ingredients Importer & Traders

Association (BAFIITA)

13:30 pm Depart meeting for Ministry of Agriculture

14:00 pm Meeting with Plant Quarantine Wing, Ministry of Agriculture

15:00 pm Depart meeting for IDG

16:00 pm Meeting with IDG to discuss their USAID activities for implementing the food

safety project funded under the Feed the Future program

17:00 pm Depart IDG for Westin Hotel

17:15 pm Meeting with Consultant Foyzul Bari Himel at Westin

18:30 pm Meeting with Alcumus at Westin

Tuesday, February 4

Depart Westin Hotel (Note: USDA accompanied on all meetings)
Meeting with Bangladesh Food Safety Authority (BFSA)
Depart meeting for WTO Cell
Meeting with WTO Cell staff
Depart meeting for Department of Livestock
Meeting with Department of Livestock
Lunch
Meeting with Bangladesh Standards and Testing Institution
Return to Westin Hotel
Depart Westin for airport

Wednesday, February 5

12:15 am Depart Dhaka for Vietnam



DAILY ACTIVITY

Friday, January 31

I arrived in Dhaka, Bangladesh after departing from Washington, DC on January 29. I was met at the airport by one of the FAS locally employed staff (Mr. Muhammad Rafq Islam) and my interpreter (Mr. Ubaidullah Al Mahfuz). Thursdays and Fridays are the weekend in Bangladesh.

Saturday, February 1

I spent the morning reviewing information about the Bangladesh food and feed safety laws and regulations as well as data and information I obtained from documents and during discussions I had with FAS Washington staff and others (including Andrew Roberts, Dep Executive Director, International Life Sciences Institute Research Foundation) before traveling to Bangladesh. I also prepared notes for questions to ask during my meetings later in the week and notes for my discussion with the U.S. Soybean Export Council (USSEC) team that was visiting Dhaka at the same time.

In the afternoon I joined the U.S. soy investment mission to Bangladesh sponsored by USSEC. The team was made up of U.S. soybean growers, including USSEC and Soybean Board Directors from Kansas and North Dakota, State soybean association grower leaders and staff from Iowa, and USSEC staff including the USSEC CEO (also the current FAEA Chairman) Jim Sutter. I participated in their Country Strategy Session in which the USSEC Bangladesh representative (Mr. Mohammad Masum Reja) gave a presentation on the soybean, feed, aquaculture, poultry, and livestock sectors as well as USSEC activities in the country. Currently there are not any food or feed safety laws or regulations restricting imports of U.S. soybeans and products.

I gave a short overview of FAEA's mission and activities in general, and our focus in Bangladesh, in particular. Later that evening I also joined the team for dinner at a nearby restaurant.

Sunday, February 2

A USDA/FAS team from Washington, DC was also visiting Dhaka at the same time. They were staff from the FAS Credit Programs Division that were giving seminars and conducting meetings to explain and promote the use of the GSM-102 program in the country. I participated in their morning seminar (held at the U.S. Embassy Annex) for bankers and feed/feed ingredient importers. I spoke with the Director of a large group of companies that include feedmills, aquaculture and poultry operations. He indicated that Bangladesh does not have much in the way of food safety standards – stating that since Bangladesh does not export much fish or poultry, they do not need to meet international standards.

After the GSM seminar I attended the Bangladesh Food Safety day held at a conference center. Although most of the speeches and presentations were not in English, my interpreter took notes and gave me a translation the next day. In summary, the purpose of the event was to recognize



that the Bangladesh government is responsible for and must ensure its citizens that first, the Bangladesh food supply is secure and second, it must be safe according to the Bangladesh Food Safety Authority (BFSA) Acting Chairman. He stated that by the end of this year, BFSA will ensure that their food is safe. They will also have a zero tolerance policy for adulterated food that is produced or imported and punish those responsible.

In the afternoon I met with Bangladesh Poultry Industries Association (BPIC) and several of their members. The BPIC was established in the 1990's. Per capita poultry meat consumption is currently 6.5-7.0 kg and the goal is to increase that to 13-15 kg over the next five years and egg consumption to 150 eggs per capita. Chicken is the lowest cost protein available to Bangladesh consumers.

Consumers prefer chicken that is not produced with antibiotics. Antibiotics may not be used in feed as a preventive but may be used as a treatment for diseases.

Regarding feed, soybean meal from the U.S. faces a 10 percent import duty – mainly to protect local soybean crushers. However, imported soybeans and Indian soybean meal can enter duty free. Currently no Indian soymeal is being imported because India is consuming all of their production and the quality of Indian meal is not consistent. U.S. soymeal also has a \$20/MT freight disadvantage compared to Argentine and Brazilian soymeal.

In the evening I participated in a dinner reception with the U.S. Ambassador, Deputy Chief of Mission (DCM), other Embassy staff, USEEC investment team and FAS GSM team. I talked with the DCM and one of the USAID staff members about my objectives and the FAEA mission in Bangladesh. The DCM, FAS and USAID are all very interested in cold chain investment and improvements in Bangladesh as a key to facilitating trade and also improving food safety. I later introduced them by email with one of my other clients, the Global Cold Chain Alliance (GCCA).

February 3

The FAS Attaché and/or other staff participated in all of my meetings this day. In the morning we had meetings at the U.S. Embassy with FAO staff and then with USAID.

FAO: We met with John Taylor, Chief Technical Officer and Ms. Kulsum Begum Chowdhury, National Value Chain and Consumer Studies Specialist. John recently arrived in Bangladesh and Kulsum has been with FAO for three years and before that for 2.5 years with the BFSA which falls under the Ministry of Food. BFSA is the Bangladesh Government entity with overall responsibility for food safety in the country and is the key organization to work with in the government when it comes to food, feed and veterinary drug safety. FAO has several consultants embedded in BFSA as it advises and assists the organization to become operational.

BFSA was established in 2015 under the Food Safety Act of 2013 but is still not fully staffed and needs more resources to do their work. Overall, progress in the food safety arena is hindered by a lack of governance (corruption is rife at all levels of society) and capacity:



- Capacity in terms of human resources, training, equipment, laboratories, etc. is a big problem for all institutions involved in food safety
- Several international organizations are involved in capacity-building programs to alleviate this problem

BFSA must coordinate with the various Ministries that have food safety responsibilities, but there is a power struggle between some of them. For example, they all want their own testing laboratories. They could use help and guidance in how to coordinate between Ministries in a way similar to the U.S. regulatory coordinated framework that includes all our food and feed safety regulatory agencies and USTR. There needs to be more sustainable training for BFSA staff. Currently, Kansas State University (KSU) is working with them to identify the staff working requirements. In general, Bangladesh follows Codex standards and they ensure the WTO is informed of regulations that could impact trade.

Another focus of FAO is to assist in developing more hygienic wet markets. They are working on developing model/pilot wet markets in Dhaka and other major cities of Bangladesh in coordination with each cities governments. About 30-40 percent of the population in Dhaka (~20 million) is at the poverty level with 50 percent of their income spent on food. But GDP is growing, in line with growth in the export of garments/clothing.

Tyler Babcock, FAS Agricultural Attache' gave a short overview of the various food and ag programs being implemented in Bangladesh including:

- McGovern Dole School Feeding: This is a 3 year program that has been renewed five times already. It focuses on providing nutritional biscuits.
- Food for Progress: Five year shrimp and prawn production program now in its 3rd year.
- USAID Feed the Future: USDA provides technical experts to support this program. It is being implemented by the International Development Group (IDG) that we met with later in the day.

Bangladesh does not have a national plant protection agency similar to our APHIS. But their Department of Livestock is responsible for testing imported feed and they need help in this area. For example, they would benefit from having a 3rd party feed certification process as part of the feed testing protocol. Archer Daniels Midland has programs set up for testing their fish feed that is accepted by Indonesia and other countries, but not by Bangladesh.

USAID: They work in a number of areas related to food and agriculture. For example, they address feed formulation and feed adulteration issues in livestock and aquaculture feed. For food safety, their resources fall under the Feed the Future (FTF) Program that is being implemented by IDG. Cornell and Purdue Universities are also being funded under FTF in developing a Food Safety Innovation Laboratory. On a global basis, Cornell is teaming with Purdue University to



establish the first Feed the Future Innovation Lab for Food Safety, which aims to solve challenges in agriculture and food insecurity in developing countries. On Aug. 13, 2019 USAID announced a nearly \$10 million award to Purdue, in collaboration with Cornell, to establish the lab on Purdue's West Lafayette, Indiana campus. While the Feed the Future Innovation Labs work extensively with more than a dozen target countries and regions, the new food safety lab will focus efforts in Bangladesh, Cambodia, Ethiopia, Kenya and Senegal.

Bangladesh Agro Feed Ingredients Importer and Traders Association (BAFIITA): BAFITTA gave a presentation on "Areas of Cooperation Between BAFITTA and FAEA". They explained the origin of the Association, its sister organizations, its functions, and their focus primarily on feed for the poultry and egg sectors. They used this meeting to voice their concerns and request assistance in resolving feed and feed ingredient testing issues that are impacting their imports:

- 1. Two new (July 2019) feed tests required by the Department of Livestock (DLS) to test for bovine and porcine products in feed. They allege that these tests in some cases have increased the cargo clearance period from three working days to 10 days.
- 2. DLS requirement to test all consignments under a single contract rather than just sampling a percentage of the shipments
- 3. Lack of testing labs and limited hours of operation for testing feed. DLS has only one lab located away from the port. BAFIITA would like for there to be more labs and one located at the port that is dedicated to testing only feed. Feed ingredients impacted include DDGS, CGM, fish meal, and complete feeds. Soybeans, soybean meal, and grain are not tested.

Plant Quarantine Wing, Department of Agriculture: This agency facilitates imports and exports including the issuance of import permits. They have quarantine staff located at the ports and major border crossings. They requested assistance in helping them organize their agency. They have drafted an organigram and would like it to be reviewed by a consultant to give feedback. As part of that, they are also working on developing their positions and responsibilities and would like consulting assistance with this. (NOTE: I do not see this as a high priority for FAEA).

International Development Group: IDG is the aforementioned organization that is implementing USAID's food safety and SPS program under FTF and as part of its effort to assist Bangladesh in facilitating trade. IDG just started putting together its implementation plan and presented a draft to me in a power point format. Based on their presentation and our discussion, there are several activities under consideration that would address food and feed safety issues of interest to FAEA. Likewise, there are some activities that require expertise and resources that FAEA could provide in areas where IDG has limited experience or contacts. Thus, we came to a mutual agreement that we would follow-up after I returned to the U.S. and continue our discussion with the intent of identifying the activities and expertise that FAEA could assist with and develop an MOU that would formalize our relationship. Given that there are a number of organizations and programs already in place to assist Bangladesh and BFSA in trade facilitation and implementation of its food safety law, the most efficient and cost-effective way for FAEA to engage



would be in a collaborative partnership with IDG as the implementer of this component of the USAID FTF program.

Potential FAEA Contractors: I met and interviewed two individuals recommended as potential contractors to assist FAEA in Bangladesh:

- **F. Bari Himel**: Himel is an independent consultant who has worked on a number of food and ag related projects in Bangladesh. His experience is in strategic planning, supply chain management and health systems. His areas of interest include health supply chain, health financing, governance and stewardship, and institutional development. Much of his most recent experience has been related to strategic planning, market research, and program evaluation in the areas of capacity building for value chains. He was also a subcontractor to Oranni on the food safety research project that FAEA commissioned in 2018.
- **Syeda Kaneez Fatema**: Kaneez is the Managing Director of Alcumus in Bangladesh. Alcumus is a UK based company that is a multi-discipline provider of risk management, food compliance and safety certification services, operating throughout the UK and via a network of organizations globally. Many of their clients in Bangladesh are in the food processing and food service sectors where they perform compliance audits on behalf of BFSA. They also work with KSU on a USDA funded food safety project to help BFSA to identify BFSA staff requirements and responsibilities (see below under BFSA).

Bangladesh Food Safety Authority (BFSA): BFSA is the key agency (under the Ministry of Food) for food safety that was the created in 2015 under the 2013 Food Safety Act. BFSA is not fully operational yet and is not fully staffed with full-time employees. They do have several embedded FAO consultants working for them. There are 20 ministries/departments and 486 agencies that have responsibility for certain areas impacting on food, feed and veterinary drug safety. The general consensus is that there has been good progress in creating relevant legislation – however, there is a dire lack of capacity to implement, monitor and enforce these pieces of legislation.

KSU is working with BFSA to help identify their staff requirements. BFSA currently has 200 staff at the district level. There will be a total of 250 enforcement and inspection staff to enforce the food safety law. The fish and aquaculture sector is already good in following food safety requirements. However, for meat and products, sanitation and hygiene remains a problem because many animals are slaughtered outside of slaughter houses, for example, during religious (Islamic) holiday celebrations. Likewise, veterinary drug residues are a problem in poultry and milk.

BFSA sends their regulations to the Ministry of Food for publication. In the past they did not report those to the WTO but now they also send them to the WTO Cell (see below) who reports them to the WTO. BFSA needs the following assistance:

- Issue focused experts to provide education and training workshops or seminars
- Public laboratories with experts in food analysis and lab accreditation



• Public awareness to educate consumers on the importance of hygienic handling of food, e.g., washing hands.

WTO Cell: The WTO Cell falls under the Ministry of Commerce and is the Government authority for reporting all relevent laws and regulations to the WTO. They said they follow all Codex, OIE and IPPC standards. *Enforcement of regulations is an issue that needs further addressed*.

Department of Livestock Services (DLS): DLS is responsible for inspecting imported feed (DDGS, CGM, fish meal, poultry meal, and complete feeds but not soybeans/soybean meal and grains) and veterinary drugs. They currently test 100% of the DDGS and CGM that is imported. DDGS, CGM, soybean meal and vet drugs are all being imported from the U.S. No beef or poultry is imported. They only allow fish and poultry meal to be imported in 25-50kg bags; not in bulk because they want to know who the importing and exporting companies are for tracking purposes. MBM is banned for import due to concerns about bovine (BSE) or porcine (Islamic religious prohibitions) contamination. The U.S. would like an MRL (rather than zero tolerance) set for MBM to take into account potential residual amounts of bovine/porcine. *DLS could use assistance in laboratory testing*.

Bangladesh Standards and Testing Institution (BSTI): BSTI is the Codex point of contact in Bangladesh and they are the standards setting (for both mandatory and voluntary standards) body for the country. Currently, 23 food products are imported into Bangladesh that require BSTI certification. Poultry feed and fish feed requires mandatory certification by BSTI before it can be sold in the country. They test for quality and safety including heavy metals, antibiotics, and pesticides. The also test milk powder and follow Codex standards.

They set standards for over 4,000 products. Of those, 181 are mandatory standards including 72 for food and ag products. The remaining standards are all voluntary standards. They have a 60 day comment period for any new voluntary national standards that they set. They have chemical testing labs for testing both imported and domestic food. They carryout three testing activities:

- 1. Monitoring: Testing samples for compliance and certification
- 2. Voluntary testing: They test products as requested by companies to give consumers confidence and trust in the products. They will test both imported and domestically produced products.
- 3. Feed Ingredients: They set the standards but do not do the testing testing is carried out by DLS, not BSTI.

(NOTE: BSTI staff would be potential officials that FAEA could sponsor to Codex committee meetings and/or possibly to meetings of other international standards setting bodies.)



KEY CONTACTS

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February 3, 2020

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February 4, Tuesday

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