

POLICY DIALOGUE REPORT

ADVANCING BANGLADESH'S LEATHER SECTOR

CHALLENGES, OPPORTUNITIES AND REFORM

SEPTEMBER 2026

SANEM
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Australian Government
Department of Foreign Affairs and Trade

FLAXA
Footwear Leathergoods & Accessories Exporters Association

About the Dialogue

On 3 September 2026, the *South Asian Network on Economic Modeling (SANEM)*, in partnership with the *Department of Foreign Affairs and Trade (DFAT)* under the *Australian High Commission* and the *Footwear, Leathergoods & Accessories Exporters' Association (FLAXA)*, convened a Policy Dialogue on "*Advancing Bangladesh's Leather Sector: Challenges, Opportunities and Reform*." The dialogue brought together government, industry representatives, development partners and researchers to examine how Bangladesh can convert its long-standing leather and footwear base into a stronger source of export diversification, employment and investment. The discussion focused on environmental compliance and the Savar Central Effluent Treatment Plant (CETP), regulatory and customs reform, the growing non-leather segment, value addition, skills and technology, access to finance and energy, post-LDC market access, and the institutional reforms needed to build a globally competitive footwear, leather and leathergoods industry.



Reflections from the Dialogue

Why export semi-processed leather at 70 to 90 cents to another country for processing, when we have ample scope for domestic employment and a critical need to earn foreign exchange right here at home?

Mr Khandakar Abdul Muktadir, MP
Honourable Minister
Ministry of Commerce
Government of the People's Republic of Bangladesh





To achieve sustained export growth and global market integration, industrial policy must incentivise a strategic transition from low-margin, semi-finished crust exports toward high-value, fully compliant finished leather products supported by Leather Working Group (LWG) environmental certification and streamlined regulatory frameworks.

Dr Selim Raihan
Executive Director, SANEM

The idea that Bangladeshi raw hide is still the best in the world is a fallacy. Due to artificial fattening and breeding shifts, raw material quality has declined, and unless we introduce advanced technologies, we cannot transform and capture the true value.

Mr Syed Nasim Manzur
President
Footwear Leathergoods & Accessories Exporters Association





Sustainable economic transformation requires a framework of reciprocal commitment: while government policy must actively create an enabling environment for private sector growth, individual enterprises must in turn align with and support the broader national reform agenda to build enduring global competitiveness.

Mr Clinton Pobke
Deputy High Commissioner, Australian High Commission

The Strategic Potential and Structural Challenges of Bangladesh's Leather Sector



Dr Selim Raihan during his keynote presentation at the dialogue.

Dr Selim Raihan framed the leather sector as one of Bangladesh's most credible opportunities for export diversification, but argued that the sector's potential remains constrained by an unfinished transition from a traditional, low-value production base to a compliant, technology-intensive and value-added industry. Drawing on the SANEM-DFAT policy paper, he noted that the sector has a substantial industrial foundation, with more than 200 tanneries, roughly 198,000 workers according to the Labour Force Survey 2024, export earnings of around US$1.04 billion in FY2023-24 according to the Export Promotion Bureau (EPB), and a contribution of about 0.5 percent of GDP. Despite these strengths, Bangladesh continues to export a large share of its leather in lower-value forms while other countries capture the higher value generated through finishing, design, branding and final-product manufacturing.

He described the constraints as spanning the entire value chain. At the upstream level, hide collection and preservation remain seasonal, fragmented and dependent on traditional salt-based preservation, contributing to quality deterioration and wastage. At the midstream level, the Savar tannery estate remains constrained by serious effluent-treatment and waste-management deficiencies. At the downstream level, limited certification, gaps in design and technical skills, weak backward linkages and the continued dominance of crust and semi-finished leather prevent firms from entering premium markets and moving into higher-value products.

Dr Raihan emphasised that the CETP problem is not an isolated infrastructure issue; it is closely linked with the broader governance structure of the sector. Regulatory responsibility is dispersed across several ministries and agencies, while coordination, monitoring and implementation remain weak. He argued that Bangladesh already has many of the ingredients necessary for success: raw materials, labour, an established industrial base and access to logistics, but lacks a coherent policy structure that can be implemented consistently. This policy and institutional deficit, rather than the absence of industrial potential, has allowed red tape, incomplete infrastructure and weak compliance to hold the sector back.

The SANEM policy framework therefore proposed three mutually reinforcing pillars. The first is environmental sustainability and compliance, beginning with a technical rehabilitation of the Savar CETP, stronger independent monitoring, enforcement of the 'polluter pays' principle, and incentives for cleaner production, water-saving technologies, chrome recovery and waste recycling. The second is governance and institutional capacity, including a comprehensive long-term leather policy and a dedicated institutional mechanism capable of coordinating government, private-sector and labour interests. The third is competitiveness and market positioning, with incentives redirected toward finished and branded goods, support for Leather Working Group (LWG) and ZDHC certification, deeper investment in design and technology skills, and development of a credible 'Bangladesh Leather' brand.

He emphasised that the transformation agenda needs measurable implementation

milestones rather than another aspirational strategy. Immediate priorities include restoring effective effluent treatment, strengthening compliance enforcement and beginning sector-wide certification support. Medium-term priorities include institutional reform, technology and skills development, and stronger incentives for finished goods. Over the longer term, Bangladesh should aim to establish full environmental compliance, raise the share of finished products substantially and reposition the sector internationally as an ethical, sustainable and competitive manufacturing base.

Policy Parity, Competitiveness and the Next Phase of Export Growth

Mr Syed Nasim Manzur argued that Bangladesh's policy discussion should treat leather footwear, non-leather footwear, leather goods and related accessories as an integrated export ecosystem rather than as narrowly separated industries. He emphasised that the non-leather segment is expanding rapidly and has access to a very large global market, while Bangladesh's current share remains small. FLAXA's presentation showed total footwear, leather and leather goods exports of about US$1.76 billion in FY2025-26, with the United States as the largest market and products reaching more than 100 countries.



Mr Syed Nasim Manzur during his keynote presentation at the dialogue.

A central theme of Mr Manzur's intervention was policy parity. He called for separate and clear six-digit HS codes for non-leather products and argued that leather and non-leather exporters should not be subject to arbitrary differences in treatment. In particular, he advocated a separate and simplified customs and bond SRO for the footwear and leathergoods sector, drawing on provisions that have supported RMG exports. He argued that a modern policy approach should focus on transparent input-output relationships, goods entering, goods leaving and the value added domestically, rather than maintaining cumbersome systems that create delays and opportunities for discretionary decision-making.

Mr Manzur also called for a substantial simplification of licensing and documentation. He contrasted Bangladesh's regulatory burden with competitor countries and argued that repeated annual renewals, multiple agency approvals and frequent changes in SROs create uncertainty and discourage new exporters. He supported longer license validity, simplified bond procedures, faster permissions, a greater role for industry associations in determining input-output coefficients, and a more consultative process before regulatory changes are introduced. He further argued that policy support should cover small and emerging exporters, not only established large firms.

On trade policy, he urged the government to look beyond RMG (Ready-made Garments) when negotiating FTAs (Free Trade Agreement), PTAs (Preferential Trade Agreement) and economic partnership agreements. Bangladesh's leading export sectors, including footwear and leathergoods, should be systematically represented in negotiations so that relevant tariff lines and HS codes retain competitive access after LDC graduation. The Japan market was highlighted as a particular concern, while agreements with other partners were presented as examples of how future negotiations could more explicitly protect sectoral market access.

Environmental compliance and infrastructure were presented as equally urgent. Mr Manzur

stressed that the CETP must become fully functional and that the sector must meet the environmental standards required by European and other premium markets. He also pointed to reliable gas and electricity, roads, ports, automation of customs and solid-waste management as core competitiveness issues. In his view, an exporter cannot compensate for deficient industrial infrastructure simply through firm-level efficiency. The government therefore needs to treat the tannery and footwear ecosystem as a complete industrial platform rather than addressing individual bottlenecks separately.

He challenged the assumption that Bangladesh still possesses uniformly high-quality raw hides. Changes in livestock practices and weaknesses in preservation have reduced raw-material quality, making technology, cold storage, pre-treatment and improved processing increasingly important. While newspaper reports often portray Bangladesh as having such a large supply of raw hides that surplus hides must be converted into gelatin, industry conditions point to a more nuanced picture. He argued that Bangladesh should be willing to import appropriate raw materials when economically justified, just as the textile sector imports cotton, and then use domestic processing capacity to create higher-value finished leather and products. The larger goal should be to move away from dependence on crust and semi-finished exports toward finished footwear, bags and other branded products.

Mr Manzur closed by describing the sector as 'half full, half empty': the constraints are serious, but the market opportunity and industrial calibre are also substantial. He emphasised simplifying the bond system, recognising the scale of non-leather growth, solving the CETP problem, rebuilding trust between government and business, strengthening investment conditions and allowing the private sector to bring in technology, finance and foreign partners. He argued that these measures could provide the fastest path first to US$3 billion and subsequently to the longer-term US$5 billion export ambition by 2030.

From Evidence to Reform
The Importance of Government–Industry Cooperation



Mr Clinton Pobke delivering welcome remarks at the dialogue.

Mr Clinton Pobke highlighted the significant but still largely unrealised potential of Bangladesh's leather and footwear industry. He observed that the sector has an experienced workforce, more than a century of industrial experience and many of the fundamental ingredients required for success, yet it remains far below its possible contribution to exports and investment. He described the leather sector as an important opportunity to diversify Bangladesh's export basket at a time when the country needs new engines of growth beyond ready-made garments.

He emphasised the value of bringing the key constituencies into one dialogue: FLAXA representing the industry, SANEM providing research and evidence, and the government bringing the policy and implementation perspective. In his view, the purpose of the dialogue was not simply to identify problems but to convert evidence into practical reform priorities. He noted that the SANEM policy paper could provide an evidence base for decisions, while industry experience was essential for identifying which administrative and regulatory constraints matter most in practice.

Mr Pobke situated the discussion within Australia's broader economic engagement with Bangladesh, including the Bangladesh Economic Engagement Program (BEEP). He noted that Bangladesh is at a critical juncture as it approaches LDC graduation and argued that the reforms needed to navigate graduation successfully are also the reforms required to strengthen the economy more broadly. The objective should therefore not to preserve old arrangements indefinitely, but to use the transition period to improve competitiveness, productivity, compliance and the overall business environment.

He also highlighted that reform requires cooperation between government and business. Government must create predictable and workable rules and infrastructure, while businesses must invest, comply with standards and support reform efforts that benefit the economy as a whole. Acknowledging that reform inevitably creates resistance, he urged stakeholders to identify practical areas of agreement and prioritise measures with the greatest economy-wide and sector-wide payoff. He also referred to DFAT's support to FLAXA's Responsible Business Conduct Cell as part of the effort to embed responsible and sustainable business practices in the sector.

In his concluding reflections, Mr Pobke said the dialogue had generated a large number of clear, practical and diverse ideas. He encouraged SANEM and FLAXA to break these into a smaller set of prioritised reforms, particularly those that could unlock benefits across the leather, footwear and related export industries rather than addressing isolated firm-level concerns only.







Participants contributing perspectives during the open discussion session.

Open Discussion
Industry Perspectives: Operational Bottlenecks and Reform Priorities

The open discussion reinforced the view that the leather sector's challenges are systemic and mutually reinforcing. Participants repeatedly returned to the need for clarity and consistency in environmental regulation. They noted that the Department of Environment's BOD (Biochemical Oxygen Demand), COD (Chemical Oxygen Demand)and other effluent parameters must be clearly specified and aligned with the design and operating requirements of the CETP. Several participants argued that even a technically improved CETP would not resolve compliance problems if firms and regulators continue to work with uncertain or inconsistent parameters.

Solid-waste management emerged as a major cost and compliance concern. Participants reported that treatment options are limited and expensive, leaving firms dependent on a very small number of service providers. They called for more investment and competition in waste-treatment facilities and for policies that treat tannery waste as a potential resource. Bones, tallow, gelatin inputs and other by-products could support new businesses if the regulatory framework allowed specialised waste-processing firms to operate within or near the tannery estate. This could simultaneously reduce environmental pressure and create new value chains.

Regulatory complexity was another recurring concern. Industry participants described long delays in bond licenses, factory permissions and other approvals, repeated visits by multiple agencies, annual license renewals and sudden increases in renewal fees. They argued that these processes raise costs, delay production and create spaces for informal payments. Suggestions included a single-window licensing mechanism, longer or indefinite license validity where appropriate, a multi-year audit cycle, digital processing, and fewer documents for new exporters. Participants also urged the government not to amend SROs or incentive rules without meaningful consultation with the businesses expected to comply with them.

Several participants raised what they described as policy discrimination between RMG and footwear/leathergoods exporters. They noted that bonded non-leather exporters may not receive the full declared cash incentive and argued that exporters using imported raw materials should not be penalised when they generate domestic value addition and foreign



Participants contributing perspectives during the open discussion session.

exchange earnings. A recurring proposal was to replace overly rigid controls with a transparent value-addition framework in which input-output standards are defined in consultation with the relevant industry association.

The discussion also focused on Bangladesh's comparative performance. Industry veterans contrasted Bangladesh with Vietnam, Cambodia, Indonesia, India and other countries that have expanded footwear and related exports much more rapidly. Participants argued that Bangladesh's large workforce should be an advantage in a sector that remains labour intensive and cannot be automated as easily as some other manufacturing activities. Yet the country has failed to translate this advantage into a comparable export position because of regulatory delays, infrastructure gaps, limited investment and weak implementation of past policy commitments.

Technology transfer, skills and design were identified as essential for moving into higher-value markets. Firms often need foreign experts and technicians, but participants reported difficulties obtaining permission for technical personnel to remain in Bangladesh long enough to transfer know-how. They also highlighted limited domestic testing capacity for international buyer requirements, the high cost of overseas testing, and the need for stronger local design expertise. Participants urged closer links between the leather and footwear industry and fashion, designing and technical training institutions, while ensuring that SMEs (Small and Medium Enterprise) are included in skills and technology programmes rather than focusing only on large factories.

Furthermore, participants emphasised the importance of reliable energy and modern logistics. Gas shortages, electricity costs, road access, port delays and customs processing, all of these reduce the competitiveness of firms operating on tight international lead times. Some businesses indicated that they were already investing in solar or other alternatives, but argued that industrial policy must still ensure reliable and affordable energy. Faster road and port development, end-to-end automation of customs and predictable access to working capital were underscored as essential components to firm-level investment.

The institutional structure of the sector was also questioned. Participants noted that numerous ministries and agencies are involved across the leather value chain, but no single institution has effective responsibility for coordinating the sector as a whole. This



Participants contributing perspectives during the open discussion session.

fragmentation complicates environmental regulation, customs, incentives, industrial infrastructure and investment decisions. Participants therefore supported a more coordinated governance mechanism and stressed that implementation arrangements, eligibility criteria and delivery responsibilities must be clearly defined for any new policy package.

Raw-material quality and value addition also featured prominently in the discussion. Participants emphasised the need for cold storage and pre-treatment facilities to preserve hides, improved collection systems, and greater use of technology to upgrade materials that can no longer command premium prices in their raw form. They also argued for investment in processing tanneries and backward linkages so that Bangladesh can reduce dependence on imported components while attracting global brands and FDI (Foreign Direct Investment). The discussion highlighted that the target should not simply be exporting more raw or semi-finished leather, but to create a domestic ecosystem capable of producing finished footwear, leather goods, luggage, accessories and other high-value products.

SMEs received particular attention. Participants argued that an export-diversification strategy would remain incomplete if policy focused only on large firms. They identified simplified or no-bond arrangements for appropriate SMEs, fewer licenses and stronger incentives for value addition as three immediate areas for reform. More broadly, they called for easier market entry, transparent regulation and access to services that would allow smaller firms to graduate into formal exporters.



Charting the Way Forward
Compliance, Investment and Institutional Reform



Hon'ble Commerce Minister Mr Khandakar Abdul Muktadir, MP, delivering his remarks at the dialogue.

Hon'ble Commerce Minister Mr Khandakar Abdul Muktadir, MP responded to the discussion by acknowledging that the relocation of the tannery industry from Hazaribagh to Hemayetpur was a sound decision in principle but was poorly managed in execution. He described the experience as a clear example of how an incomplete industrial transition can damage an otherwise promising sector. The government's current task, he said, is to bring the sector back onto a workable path rather than preserve an unsustainable structure. He outlined two parallel approaches for the tannery estate. First, firms that are exhausted, unable to invest further or unwilling to meet the required standards should be offered a 'graceful exit' so that they can close or shift to other activities without remaining indefinitely in a non-compliant state. Second, firms that continue operating in the sector must become fully compliant. He highlighted that CETP performance is important but represents only one part of international environmental and social compliance. Tannery firms must also meet the wider criteria required for LWG certification and responsible operation if Bangladesh is to sell into premium markets.

The Minister stated that the government's objective is to retain more value addition inside Bangladesh. His expectation is that raw hides should increasingly be processed domestically into finished leather and, ultimately, into leather products before export. He linked this directly to employment creation and the need to ensure that Bangladesh captures a larger share of the value generated from its livestock and industrial base.

On the CETP, he said the government was working on a correction plan and comparing technical options, including proposals associated with Italian and Chinese expertise. He noted that repairing the existing plant may in some circumstances be more expensive than constructing a new facility, so the government is considering both improvement of the present CETP and the possibility of a new, higher-quality system. He also indicated that larger firms may need to install their own ETPs, with government support for technical solutions, while all firms would be expected to meet environmental requirements.

He also proposed making the Hemayetpur tannery area more self-sufficient in solid-waste management. Rather than transporting waste elsewhere, the government would assess the volume and composition of waste generated by the estate and facilitate specialised factories capable of reprocessing bones, tallow and other solid by-products into commercially usable materials. The aim would be to create a more circular industrial ecosystem in which waste management is integrated into the production cluster.

The Minister acknowledged the private sector's concerns regarding cumbersome business processes. He said the government was working to simplify license renewals, bond-related procedures and other regulatory requirements, while noting that simplification would need to be implemented progressively. On recent fee increases, he suggested that the important issue was to ensure that businesses receive better and less burdensome services in return. He committed to simplify renewal processes and announce further business-process reforms as reforms advance.

He also responded positively to the request for clearer treatment of non-leather products, including separate HS codes where needed. On market access, he said Bangladesh would continue negotiations to improve access for leather and footwear products in Japan and referred to progress made with South Korea. He further expressed interest in attracting investment from established leather-producing countries, including Italy and Spain, arguing that these are two corners in Europe, and this sends a strong signal about the country's compliance and manufacturing capability.

Skills and design were also prioritised. The Minister announced plans for a world-class skills and design institution near Hemayetpur, expected to begin operations around 2027, with sector associations closely involved in its management. He also highlighted further industrial development around the tannery zone, including private-sector participation and new investment platforms.

He concluded by assuring participants that the issues raised during the dialogue would be taken forward with the industry rather than addressed unilaterally. The government, he said, intends to announce its formal direction for the leather sector in the near future. The overall approach would combine compliance, easier business processes, new investment, skills, design, finance and market access so that the sector can regain competitiveness and move from unfinished transition to sustained growth.



Sector-Specific Recommendations Emerging from the Dialogue

To translate the dialogue into a more actionable reform agenda, the recommendations can be organised into four closely linked areas: tannery reform, leather value addition, footwear competitiveness, and the expansion of non-leather products. The priorities below consolidate the main proposals raised by the participants across the discussion.

Tannery

- Resolve the Savar/Hemayetpur CETP problem as the first operational priority. Undertake a technical assessment of the existing plant, restore full treatment capacity where feasible, and consider a new higher-quality CETP if rehabilitation is not economically or technically viable.
- Establish a comprehensive solid-waste management system within the tannery estate. Develop specialised facilities for processing bones, tallow and other tannery by-products to reduce environmental pressure, create new value chains and move toward a circular industrial ecosystem.
- Define clear and predictable environmental compliance standards for tannery operations. Establish transparent BOD, COD and other effluent parameters aligned with CETP design capacity and international market requirements so that firms can plan compliance investments effectively.
- Improve raw hide quality through better collection and preservation systems. Develop cold storage, pre-treatment facilities and improved preservation practices to reduce deterioration and increase the availability of export-quality hides.
- Implement a structured compliance transition strategy for tannery firms. Support viable firms to upgrade technology and meet international standards while enabling non-compliant and financially unviable firms to undertake a responsible exit process.

Leather

- Accelerate the transition from semi-finished leather exports toward finished leather production. Redirect policy support toward finishing capacity, product diversification and higher-value leather goods to enable Bangladesh to capture greater value from its leather resources.
- Expand certification readiness for premium global markets. Support firms in obtaining international certifications, including LWG-related compliance, and strengthen responsible production practices required by international buyers.
- Develop stronger leather design and technical capabilities. Establish effective linkages between industry, training institutions and design centres to improve product innovation, technical expertise and competitiveness.
- Strengthen leather value chains through investment and technology transfer. Facilitate partnerships with international leather-producing countries and encourage investment in modern processing facilities and supporting industries.
- Build a global “Bangladesh Leather” brand. Develop coordinated branding and market positioning strategies highlighting sustainability, quality and responsible manufacturing.

Footwear

- Establish a dedicated footwear and leathergoods customs and bond framework. Introduce simplified procedures similar to effective RMG practices, including clearer input-output co-efficients, faster approvals, inter-bond transfers and reduced documentation requirements.
- Secure footwear market access after LDC graduation. Ensure footwear HS codes are systematically included in future FTAs, PTAs and economic partnership agreements, particularly with strategic markets such as Japan and other high-value destinations.

Footwear

- Strengthen footwear design, technical skills and productivity capabilities. Expand industry-oriented training, testing facilities and technology adoption to support movement toward higher-value footwear manufacturing.
- Develop domestic footwear backward linkages. Encourage investment in local production of components such as soles, linings, buckles, zippers and other accessories to reduce supply-chain dependence.
- Expand access to finance and investment for footwear exporters. Improve availability of working capital, export finance, technology financing and foreign investment opportunities, particularly for emerging exporters and SMEs.

Non-Leather

- Establish equal policy treatment for non-leather exporters. Review incentives, customs and regulatory arrangements to ensure firms generating domestic value addition and export earnings are not disadvantaged due to differences in raw material composition.
- Introduce separate HS classifications and clearer regulatory recognition for non-leather products. Develop an appropriate policy framework reflecting the growing importance of non-leather footwear, bags and accessories in global markets.
- Adopt a transparent value-addition-based incentive framework. Replace rigid input restrictions with clearly defined input-output standards that recognise domestic processing, employment generation and export contribution.
- Facilitate competitive access to imported raw materials and components. Allow firms to source globally competitive inputs where necessary while ensuring domestic value addition through local manufacturing activities.
- Support expansion of Bangladesh's non-leather export base. Improve access to finance, technology, skills and market development support to enable firms to capture a larger share of the rapidly growing global market.

Cross-Cutting Recommendations for the Leather, Footwear and Accessories Ecosystem

- Create a coordinated governance mechanism for the leather and footwear ecosystem. Establish clearer institutional responsibility across ministries and agencies to improve implementation of environmental, trade, investment and industrial policies.
- Simplify business regulations through digital and single-window systems. Reduce licensing delays, repeated renewals, unnecessary documentation and multiple approvals through streamlined regulatory processes.
- Ensure reliable industrial infrastructure and logistics services. Improve electricity and gas supply, road connectivity, port efficiency, customs automation and cargo clearance to reduce production costs and export lead times.
- Strengthen sector-wide skills, testing and technology infrastructure. Operationalise industry-focused training and design institutions, expand testing facilities and facilitate technology transfer.
- Improve access to finance and investment. Expand export finance, technology financing and investment facilitation mechanisms to support both established firms and SMEs.
- Develop an implementation roadmap with measurable milestones. Translate policy commitments into specific timelines, responsible institutions and monitoring mechanisms through continued government-industry collaboration.

Participant List

(Not in order of seniority)

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15. Mr Sufia Noor Shilpi
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16. Mr Rian Khan
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17. *Mr Mohammad Shahadat Ullah*
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19. Mr Md. Azmal Hossain
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