

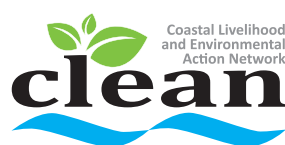
November 2025

The Moheshkhali-Matarbari Integrated Development Initiative

MIDI Master Plan

Another Japanese domination for
Energy Colonialisation in Bangladesh

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Mahdiul Islam Mahi
Sadia Rowshon Adhora



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First Impression: November 2025

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Acronyms

| | |
|-------------------|---|
| BDT | Bangladesh Taka |
| BESS | Battery Energy Storage Systems |
| BEZA | Bangladesh Economic Zone Authority |
| BIG-B | Bay of Bengal Industrial Growth Belt |
| BRI | Belt and Road Initiative |
| BSS | Bangladesh Sangbad Sangstha |
| Capex | Capital Expenditure |
| CLEAN | Coastal Livelihood and Environmental Action Network |
| CO ₂ e | Carbon Dioxide equivalent |
| COXDA | Cox's Bazar Development Authority |
| CPA | Chattogram Port Authority |
| CPGCBL | Coal Power Generation Company Bangladesh Limited |
| FFC | Fossil Free Chattogram |
| FPIC | Free, Prior, and Informed Consent |
| FSRU | Floating Storage and Regasification Unit |
| GW | Gigawatt |
| IEEFA | Institute for Energy Economics and Financial Analysis |
| JACSES | Japan Center for Sustainable Environment and Society |
| JERA | Japan's Energy for a New Era |
| JICA | Japan International Cooperation Agency |
| LNG | Liquefied Natural Gas |
| LPAD | Legislative and Parliamentary Affairs Department |
| MIDA | Moheshkhali Integrated Development Authority |
| MIDI | Moheshkhali-Matarbari Integrated Development Initiative |
| SEA | Strategic Environmental Assessment |
| SREDA | Sustainable and Renewable Energy Development Authority |
| USD | United States Dollar |



EXECUTIVE SUMMARY

The Moheshkhali - Matarbari Integrated Development Initiative (MIDI) Master Plan is the operational core of the Bay of Bengal Industrial Growth Belt (BIG-B), a Japanese geopolitical strategy as an alternative to the China-led Belt and Road Initiative (BRI). The

MIDI Master Plan's associated legal structure, the Moheshkhali Integrated Development Authority (MIDA) Ordinance, presents severe risks across governance, economy, environment, and social welfare, such as:

Key Findings

1. Unconstitutional Governance and Institutional Conflict

The Moheshkhali Integrated Development Authority (MIDA) Ordinance, promulgated without parliamentary scrutiny, violates **Article 59 of the Constitution** by usurping the powers of elected local government bodies (Union, Upazila, and District Parishads) in Moheshkhali. It operates as a parallel, unelected government accountable only to the central administration, bypassing democratic accountability mechanisms. MIDA also creates unworkable jurisdictional conflicts with existing statutory bodies,

including the Chattogram Port Authority and Cox's Bazar Development Authority.

2. Economic Dependency and Fiscal Peril

The Master Plan, heavily influenced by JICA, rejects viable solar and wind energy options in favour of liquefied natural gas (LNG), thereby maximising fuel imports and the sale of Japanese technology and fuel. This model effectively makes Bangladesh bear the market risks while Japan controls the finance, technology, and fuel supply. It ties Bangladesh's industrial future to the volatile

global LNG market and unsustainable subsidies, which have already driven gas tariffs up by up to 179%.

3. Catastrophic Environmental Impacts

The planned LNG and fossil fuel buildout is projected to emit 1.3 billion tonnes of CO₂e over its operational lifetime, roughly six times Bangladesh's current annual total emissions. Construction of roads and other infrastructures has already caused irreversible damage to the Kohelia River, disrupting natural drainage, exacerbating flooding, increasing soil salinity, and collapsing local fisheries. Extensive construction activities threaten the major flyways of the critically endangered Spoon-billed Sandpiper and Nordmann's Greenshank.

4. Massive Social Injustice and Displacement

The MIDI Master Plan requires the acquisition of 12,951 acres of land, leading to the estimated eviction and displacement of 116,000 people, the entire population of Matarbari Island. Converting salt pans and shrimp farms into industrial land destroys the community's primary livelihoods. Compensation processes are reportedly corrupt, with affected persons allegedly paying up to 30% of their compensation as bribes.

The plan, in its current manifestation, acts like a foreign-controlled machine requiring vast local resources, such as land, finance and sovereignty, to fuel an overseas industrial strategy, while leaving the local population to bear the environmental and debt fallout.

Recommendations

1. Repeal the MIDA Ordinance

The Government must immediately repeal the MIDA Ordinance, restoring development planning authority to constitutionally mandated local government bodies in coordination with existing statutory authorities.

2. Cancel the MIDI Master Plan

The current MIDI Master Plan, formulated with a demonstrated bias toward Liquefied Natural Gas (LNG), should be cancelled immediately.

3. Prioritise Renewables

The region's energy strategy must be rewritten to prioritise 30 GW of solar and 9.8 GW of identified wind potential and solar capabilities, coupled with investment in grid modernisation rather than LNG terminals.

4. Independent Strategic Assessment

A new Strategic Environmental Assessment (SEA) must be conducted, free from JICA influence and with genuine and independent civil society participation, to assess the cumulative environmental and social impacts.

5. Restore the Kohelia River

Immediate ecological measures must be taken to dredge and restore the flow of the Kohelia River to reverse waterlogging and environmental destruction.

6. Moratorium on Land Acquisition

A strict moratorium on further land acquisition from Matarbari Island should be imposed until a transparent, rights-based resettlement and rehabilitation framework is established.



1 INTRODUCTION

The Strategic Architecture of the Moheshkhali-Matarbari Integrated Development Initiative (MIDI)

The Moheshkhali-Matarbari Integrated Development Initiative (MIDI) cannot be understood in isolation; it is the operational core of the Bay of Bengal Industrial Growth Belt (BIG-B), a grand strategic partnership forged between Japan and Bangladesh in 2014. The BIG-B initiative was explicitly designed to accelerate industrial agglomeration along the Dhaka-Chattogram-Cox's Bazar corridor, theoretically propelling Bangladesh toward middle-income status by 2031 and high-income status by 2041 (JICA, 2023a).

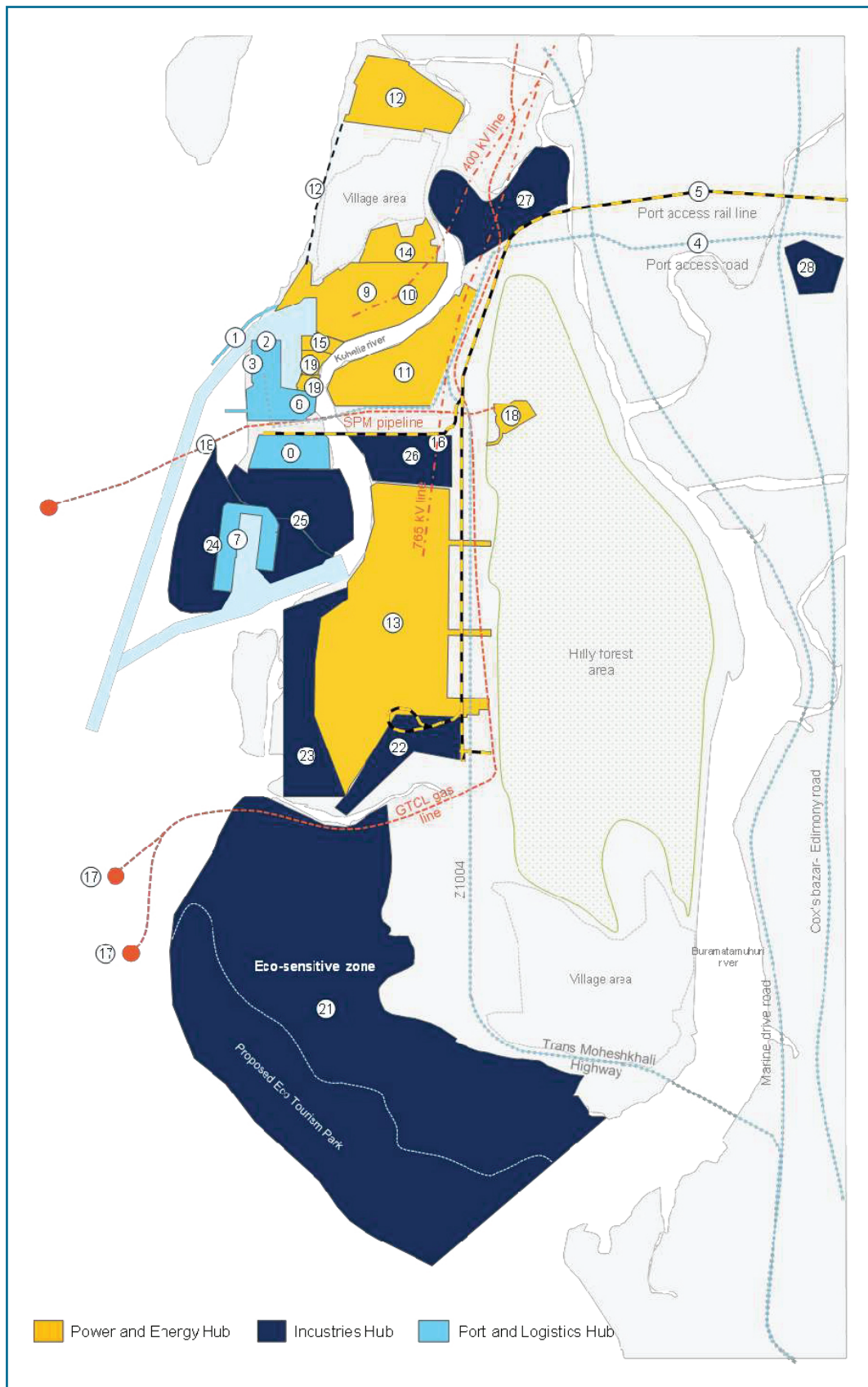
However, beneath the veneer of development cooperation lies a stark geopolitical calculus. As China expanded its Belt and Road Initiative (BRI) across South Asia, securing critical infrastructure projects in Sri Lanka, Pakistan, and Myanmar, Japan sought a countervailing foothold in the Bay of Bengal.

Matarbari, with its unique geographical potential for a deep-sea port, became the focal point of this strategic rivalry. JICA's involvement in MIDI is comprehensive, extending beyond mere financing to the formulation of the Master Plan, land-use policies, and the legal structures governing the region (JICA, 2025).

This level of involvement suggests that MIDI is as much a projection of Japanese industrial and energy policy as it is a Bangladeshi development project.

The initiative seeks to create a Japan-centric industrial zone, securing contracts for Japanese construction firms, technology providers, and energy trading companies, effectively creating **an Energy Colony** where Bangladesh provides the land and labour while Japan controls the infrastructure, technology and energy supply.

Map 1. Area of the MIDI Master Plan



Source: MIDI Strategic Vision Development and Economic Impact Analysis (2023)

1.1 MIDI Master Plan: A Tripartite Hub

The MIDI Master Plan, currently under formulation by JICA with a target completion of January 2028, conceptualises the development of an area spanning approximately 37,000 hectares (91,429 acres) across Moheshkhali and Matarbari. The plan rests on three strategic pillars or hubs, each designed to reinforce the others:

Table 1. The Tripartite Hubs under the MIDI Master Plan

| Type of Hub | Strategic Function | Key Components |
|----------------------|---|--|
| Energy & Power Hub | To provide a stable, large-scale energy supply to the industrial zone and the national grid. | Originally coal-centric; now shifting to 13 GW of LNG, with plans for Hydrogen and Ammonia. Includes LNG terminals, FSRUs, and thermal power plants. |
| Port & Logistics Hub | To establish a deep-sea port serving as a gateway for international trade and a transshipment point for the region. | Deep-sea channel (18.5m draft), container terminals, multipurpose terminals, and connectivity to the national rail and road network. |
| Industrial Hub | To attract foreign direct investment (FDI) in heavy industries, utilising the port and energy infrastructure. | Special Economic Zones (SEZs), petrochemical complexes, steel mills, and export-oriented manufacturing units. |

Source: Project Overview: Formulation of MIDI Master Plan (JICA, 2025)

1.2 MIDA: Governance by Exception

In the wake of the dramatic political shifts in Bangladesh in 2024, the Interim Government moved swiftly to institutionalise MIDI management. Bypassing the standard parliamentary legislative process, due in part to the dissolution of parliament, the government promulgated the Moheshkhali Integrated Development Authority (MIDA) Ordinance, 2024 (later referred to as the MIDA Ordinance 2025 in some contexts regarding amendments or finalisation) (BSS, 2025).

This Ordinance established MIDA as a statutory authority with sweeping powers to prepare master plans, acquire land, approve building construction, and coordinate all development activities within its jurisdiction.

A Chairman, appointed directly by the Chief Adviser, heads the authority, creating a centralised command structure that reports to the highest levels of the administration (BSS, 2025).

The urgency to establish MIDA, despite the transitional nature of the government, appears driven by external pressure to meet JICA's project timelines. JICA's internal documents reveal a rush job schedule in which the establishment of a competent authority was a prerequisite for further master plan formulation and loan disbursement (JICA, 2025). This haste has resulted in a legal framework that is disconnected from the country's democratic ethos and constitutional mandates.

1.3 Flawed Process and Substances

The timeline for the MIDI Master Plan formulation reveals a process driven by expediency rather than rigour. JICA’s internal schedule indicates a rush job aimed at securing approvals during the tenure of the Interim Government, potentially to lock in contracts before a democratic transition could subject the plan to parliamentary scrutiny.

a) March 2025 Deadline

The Scoping Plan for the Strategic Environmental Assessment (SEA) and the first draft of the Master Plan were both scheduled for approval in March 2025 (JICA,

2025). This simultaneity is procedurally flawed; an SEA is supposed to inform the Master Plan, not run parallel to it. It suggests the environmental assessment is a rubber-stamping exercise for decisions already made (JICA, 2023b).

b) Opaque Consultation

While JICA claims to schedule stakeholder meetings in Dhaka and Matarbari, civil society representatives report a total lack of transparency. No public notices were found in newspapers or on websites regarding these meetings, raising serious concerns about the exclusion of dissenting voices.

1.4 MIDI Energy Mix: Engineering Dependency

The MIDI Master Plan’s Energy & Power Hub analysis presents four options, which notably favour technologies advantageous to

Japanese industry while demonstrating a distinct bias against renewable energy, especially Solar and Wind energy.

Table 2: MIDI Master Plan’s Proposed Energy Mix

| Options | Composition | JICA Priority | Implications |
|---------|----------------|--------------------------|---|
| A | Coal+LNG+Solar | 3 (least preferred) | Retains coal, contradicting global climate trends. Used as a straw man to make Option B look better. |
| B | LNG + Solar | 1 (most preferred) | Maximises LNG imports and the sale of Japanese turbines. Ignores market volatility and emission risks. |
| C | Hydrogen+Solar | 2 (moderately preferred) | Relies on unproven, prohibitively expensive hydrogen technology. Positions Bangladesh as a pilot for Japanese technology. |
| D | Solar Only | 4 (Rejected) | Dismissed due to ‘low energy density’ and grid stability concerns, ignoring modern storage solutions. |

Source: Project Overview: Formulation of MIDI Master Plan (JICA, 2025)

JICA-financed Matarbari 1200 MW Coal Power Plant, one of the most expensive power plants in the world.
Photo: CLEAN (Kaniz Rabeya)



1.5 JICA's Energy Favouritism

a) Rejection of Solar

JICA rejects the Solar-only option, citing insufficient inertia for grid stability and high battery Capex. This argument is technologically outdated, as modern grid-forming inverters and Battery Energy Storage Systems (BESS) can effectively provide the necessary stability. The rejection stems from China's dominance in solar technology; promoting it would not serve Japanese industrial interests (CLEAN, 2025).

b) Exclusion of Wind

The MIDI Master Plan conspicuously excludes wind energy as a primary option, despite the Power Division's own research indicating a potential of 9.86 GW in the

coastal belt (Power Divison, 2023). Wind power is highly viable in the Matarbari region. Its exclusion is a calculated move to avoid introducing a sector where non-Japanese competitors might excel.

c) Hydrogen Mirage

JICA promotes hydrogen and ammonia co-firing as clean energy. However, producing green hydrogen is currently energy-intensive and expensive, while Blue or Grey hydrogen relies on fossil fuels. Promoting hydrogen infrastructure now locks Bangladesh into a technology pathway that primarily exists in Japanese industrial strategy documents, rather than in economic reality for developing nations (Sekitan, 2022).

1.6 Energy Colony Paradigm

The MIDI Master Plan effectively structures Moheshkhali as a Japanese Energy Colony. The model ensures that:

- a) **Finance** comes from Japanese loans (JICA), creating a debt burden for Bangladesh.
- b) **Technology**, such as turbines and floating storage and regasification units (FSRUs), is purchased from Japanese firms, including Japan's Energy for a New Era (JERA), Mitsui & Company and Mitsubishi Corporation.

- c) **Fuel**, e.g., Liquefied Natural Gas (LNG), is traded by Japanese trading houses, such as JERA, Tokyo Gas or Sumitomo Corporation.
- d) **The risks in the LNG market** and at terminals, such as price volatility and environmental damage, are borne entirely by Bangladesh.
- e) **This extractive relationship** undermines Bangladesh's energy sovereignty and economic independence.



*Contaminated Water,
Polluted Air and Poisonous Soil are
the only things the local people will get
from the MIDI Master Plan*



(c) United News Bangladesh

2 ILLEGITIMACY OF THE AUTHORITY

Constitutional Infirmities of the MIDA Ordinance

The promulgation of the MIDA Ordinance and the authority's structure present severe conflicts with the Constitution of the People's Republic of Bangladesh. These conflicts are not merely procedural but strike at the heart of the Constitution's basic structure, specifically regarding local governance and the separation of powers, as

stated in Articles 11, 59, and 60 ([LPAD, 2025](#)). MIDA has introduced profound institutional fragmentation. The authority's extensive mandate conflicts with and duplicates the jurisdictions of existing statutory bodies. This overlap has created a regulatory quagmire that negatively impacts effective administration and discourages investment.

2.1 Erosion of Local Governance

The most egregious constitutional violation inherent in the MIDA Ordinance is the dismantling of local self-government. Article 59 of the Bangladesh Constitution is unambiguous: "*Local Government in every administrative unit of the Republic shall be entrusted to bodies composed of persons elected in accordance with law.*"

Furthermore, Article 59(2) mandates that these elected bodies, such as Union Parishads, Upazila Parishads and District

Parishads, perform functions relating to: (a) Administration and the work of public officers; (b) Maintenance of public order; and (c) The preparation and implementation of plans relating to public services and economic development ([LPAD, 2025](#)).

The MIDA Ordinance effectively strips the elected local government bodies of Moheshkhali of these constitutional powers ([Majumdar, 2018](#)). By vesting the exclusive authority to formulate the Master Plan,

control land use, and oversee economic development in an unelected, centrally appointed bureaucratic body, the state has rendered the local government institutions hollow shells.

MIDA operates as a parallel government, accountable only to the central administration, bypassing the democratic accountability mechanisms envisioned by

the Constitution's founding fathers. This centralisation is a direct affront to the principle of devolution and participatory democracy. In a region prone to natural disasters like cyclones, local governments are the first line of defence and resilience; weakening them in favour of a remote industrial authority compromises the safety and well-being of the local population.

2.2 Power and Democratic Deficit

While Article 93 of the Constitution empowers the President to promulgate ordinances when Parliament is not in session, this power is constitutionally circumscribed by the requirement that *'immediate action'* be necessary. The establishment of a long-term development authority like MIDA does not meet the threshold for an emergency that would necessitate bypassing the legislative process.

a) Lack of Necessity

There was no imminent crisis in Moheshkhali that required the immediate formation of

MIDA through an executive order. The rush appears to be driven by JICA's conditionality rather than public exigency.

b) Democratic Legitimacy

Creating a permanent statutory body with vast powers over land, livelihood, and taxation through an ordinance is a misuse of executive power. It precludes parliamentary debate, public scrutiny, and stakeholder consultation, all of which are essential to a law with such far-reaching consequences. It is a dangerous precedent that undermines the rule of law (FIDH, 2025).

2.3 Violation of Fundamental Rights

The operational mandates of MIDA conflict with several fundamental rights guaranteed under Part III of the Constitution. Notably:

a) Right to Property

The MIDA Ordinance empowers the authority to acquire vast tracts of land. While the Constitution allows acquisition for public purposes, the transfer of this land for commercial industrial use, often to foreign entities or private corporations, blurs the line between public good and private profit. The

planned acquisition of 12,951 acres, which would lead to the eviction of 116,000 people, raises questions about the proportionality and reasonableness of this property deprivation.

b) Right to Protection of Law

Article 31 of the Constitution guarantees that no action detrimental to the life, liberty, body, reputation, or property of any person shall be taken except in accordance with law. The arbitrary nature of the Master Plan's

formulation, its exclusion of affected communities, and its failure to provide adequate rehabilitation violate the substantive due process requirements of Article 31 (LPAD, 2025).

c) Right to Life

The Supreme Court of Bangladesh, in landmark judgments (e.g., Dr Mohiuddin Farooque v. Bangladesh), has interpreted the

‘right to life’ (Article 32) to include the right to a healthy environment (Wadud, 2019). The MIDI Master Plan’s projected environmental destruction, specifically the filling of the Kohelia River and the emission of 1.3 billion tonnes of CO_{2e}, constitutes a direct violation of the right to life of the residents of Moheshkhali and the broader citizen (DT, 2021).

2.4 Conflict with the Judiciary

The formulation of the MIDI Master Plan also places the executive in conflict with the judiciary. In December 2024, the High Court Division of the Supreme Court ordered the government to revise the Integrated Energy and Power Master Plan (IEPMP), citing its failure to protect the environment and its over-reliance on fossil fuels (UNB, 2024).

Despite this judicial directive, JICA and the MIDI authority have proceeded with a Master Plan that bases its energy strategy (Option B) entirely on the flawed IEPMP (JICA, 2025). By ignoring the High Court’s order to reconsider the energy mix in consultation with civil society and environmental experts, the MIDI planners are arguably in contempt of court, undermining the authority of the judiciary to adjudicate on environmental governance.

THE BUSINESS STANDARD

TBS Report

03 December, 2024, 10:50 pm

Last modified: 03 December, 2024, 10:55 pm

HC asks why Integrated Energy and Power Master Plan should not be reconsidered

The High Court has issued a rule requiring the respondents to explain why the Integrated Energy and Power Master Plan (IEPMP) 2023 should not be reconsidered, with input from the Ministry of Environment, Forest, and Climate Change.

The court’s rule also asks the respondents to clarify why they should not be directed to consider and implement the Climate Prosperity Plan 2022-2041, a government-approved strategy aimed at addressing the country’s climate challenges in alignment with international treaties Bangladesh has entered into.

The rule was issued by an HC bench led by Justice Fahmida Quader and Justice Mubina Asaf, as per a press release issued today (3 December).

It was a response to a writ petition filed by Lawyers for

Energy Environment and Development Limited (LEED), with Barrister Abdullah Mahmood Hasan, Advocate Abdullah Al Noman, Advocate Monera Haque Mone, and Advocate Shimon Raihan representing the organisation.

The government and the secretary of the Ministry of Power, Energy, and Mineral Resources were named as respondents.

The case marks a historic milestone, making Bangladesh the first South Asian country to challenge the IEPMP in the Supreme Court.

LEED, a social enterprise dedicated to promoting energy security and environmental protection, has long advocated against the government’s reliance on fossil fuels and its failure to prioritise climate change and human rights.

This legal battle seeks to ensure

Bangladesh fulfils its constitutional commitment to a healthy environment and adheres to international climate agreements, such as the Paris Agreement and the UN’s Sustainable Development Goals.

The case mirrors global climate lawsuits, including a recent one by children in South Korea, and marks a significant step toward climate justice in South Asia, setting an important legal precedent for holding governments accountable for climate inaction.

Hasan Mehedi, chief executive of the Coastal Livelihood and Environmental Action Network, expressed concerns about the IEPMP, highlighting its reliance on fossil fuels like coal and LNG (30.7%) and advanced but unproven technologies such as liquid hydrogen and ammonia (32.8%) by 2050.

News about the High Court Division’s order to review the Integrated Energy and Power Master Plan. Source: the Business Standard

2.5 Conflict with the Chattogram Port Authority



Chattogram Seaport, the economic lifeline of Bangladesh

The Chattogram Port Authority (CPA) is the statutory body established under the Chittagong Port Authority Ordinance 1976, responsible for the management, operation, and development of the country's principal seaport. The Matarbari Deep Sea Port was originally conceived and initiated as a project under the CPA (LPAD, 2022).

a) Operational Sovereignty

The CPA has already signed contracts with Japanese joint ventures (Penta-Ocean and TOA Corporation) for the construction of the Matarbari port terminals (Dredgewire, 2025). However, the MIDA Ordinance grants MIDA the power to oversee the Port & Logistics Hub. It creates a direct conflict, whether the CPA retains operational control or it becomes a subsidiary operator under MIDA.

b) Tariff and Revenue Disputes

The CPA acts as a regulator, setting tariffs and collecting port dues. With MIDA tasked with developing the logistics hub to

attract investment, there is a distinct conflict of interest. MIDA may seek to lower tariffs to attract investors to its industrial zones, directly impacting the CPA's revenue model. The legal texts do not clarify which authority holds the ultimate power to gazette port tariffs in Matarbari (Dredgewire, 2025).

c) Channel Management

The deep-sea channel is critical for both the port and the energy terminals, which are managed by the Coal Power Generation Company Bangladesh Limited (CPGCBL).

The MIDI Master Plan attempts to integrate these, but without a clear legal amendment to the CPA Ordinance, the CPA remains the statutory conservator of the port limits. MIDA's encroachment into this domain creates legal uncertainty for shipping lines and insurers.

2.6 Conflicts with the Cox's Bazar Development Authority

The Cox's Bazar Development Authority (COXDA) was established in 2016 to ensure planned urban and commercial development in the whole Cox's Bazar district, which administratively includes Moheshkhali Upazila (LPAD, 2016).

a) Planning Redundancy

COXDA is mandated to prepare master plans for the entire district. MIDA is now mandated to prepare a master plan for Moheshkhali. This duplication creates a situation in which two different statutory bodies may have

conflicting land-use plans for the same territory (ILO, 2024).

b) Regulatory Nightmare

For a private investor or a resident, the path to obtaining a building permit or land clearance becomes opaque. There is an overlap in the powers of COXDA, MIDA, and the local Union Parishad, which will confuse investors. This regulatory overlap creates fertile ground for corruption and bureaucratic delays, undermining the very efficiency MIDA was supposed to deliver.

c) Urban Vision Clash

COXDA often focuses on tourism-centric development, given Cox's Bazar's status. MIDA's vision is heavily industrial. These two visions are incompatible in proximity; industrial pollution from MIDA's zones will degrade the tourism potential that COXDA acts to protect.

Map 2. Cox's Bazar District Map



2.7 Marginalisation of Focal Agencies

The Sustainable and Renewable Energy Development Authority (SREDA) is mandated to promote renewable energy in the country. MIDA's energy planning, driven by JICA's fossil-fuel agenda, completely marginalises SREDA. By centralising energy planning within MIDA, the government effectively bypasses the statutory agency responsible for the green transition (SREDA, 2025).

The Bangladesh Economic Zones Authority (BEZA) is the sole authority for economic zones in Bangladesh (LPAD, 2012). The formation of MIDA effectively carves out a super-zone that operates outside standard BEZA protocols. This fragmentation of the economic zone regime weakens the national standardisation of investment incentives and labour regulations.

2.8 MIDA vs. Existing Statutory Bodies

To fully appreciate the extent of the institutional conflict, it is necessary to contrast MIDA's mandate with those of the existing authorities it displaces or overlaps

with. The following table highlights the key structural and functional differences that contribute to the current administrative paralysis.

Table 3: Comparative Analysis of Statutory Mandates

| Feature | MIDA | CPA | COXDA |
|---------------------------------|---|---|--|
| Nature of Authority | Super-authority: Designed to act as a singular government entity for a specific zone, integrating port, energy, and industrial functions. | Sectoral Authority: Focused exclusively on maritime trade, port operations, and navigation safety. | Urban Planning Authority: Focused on planned urbanisation, zoning, and tourism development for a specific administrative district. |
| Territorial Jurisdiction | Moheshkhali and Matarbari (approx 91,429 acres). Effectively carves out a separate administrative enclave. | Seaport limits of Chattogram and Matarbari, including water and immediate port lands. | The entire Cox's Bazar District, especially urban and tourist areas, including Moheshkhali Upazila. |
| Primary Mandate | Attracting Foreign Investment & Industrialisation: Focus on creating an industrial and commercial hub and coordinating all development. | Trade Facilitation: Focus on efficient cargo handling, navigation safety, and revenue generation through port dues. | Planned Urbanisation: Focuses on regulating building codes, zoning for tourism vs. residential and commercial uses, and beautification. |
| Key Conflict Point | Usurps the planning powers of local government and COXDA while attempting to dictate the port's strategy, which is CPA's domain. | Retains statutory control over port tariffs and operations, creating a dual-command structure at the Matarbari Deep Sea Port. | The district's master plan is overridden by MIDA's industrial master plan, resulting in conflicting land-use zones. |
| Accountability | Highly Centralised: Chairman appointed by the Chief Adviser; reports directly to the highest executive office. Bypasses local accountability. | Ministry-centric: Accountable to the Ministry of Shipping | Ministry-centric: Accountable to the Ministry of Housing and Public Works. |

The table reveals that MIDA is not merely another development agency; it is an attempt to create a 'state within a state' in Moheshkhali. Unlike CPA or COXDA, which have clearly defined functional or

geographical boundaries, MIDA's mandate is all-encompassing within its territory, leading to inevitable friction with agencies that have operated there for decades.



3 SOCIAL IMPACTS

Displacement and Human Rights Violations

The scale of displacement required for the full realisation of the MIDI Master Plan is unprecedented in the region's history. The Master Plan involves the acquisition of 12,951 acres (5,241 hectares) of land. This acquisition will directly impact an estimated 116,000 people (JICA, 2025). Effectively, the plan envisions the eviction of the entire

population of Matarbari Island to make way for industrial zones. JICA's own documents admit that involuntary resettlement is an expected social impact (JICA, 2025). However, the sheer scale suggests a forced depopulation rather than a managed resettlement.

3.1 Massive Displacement

The MIDI will actually transform around 20,400 acres of land into an industrial corridor featuring ports, LNG terminals, thermal power plants, and energy hubs, which will result in the forced displacement of between 100,000 and 116,000 people from their ancestral homes and livelihoods. The project affects numerous communities across Moheshkhali and Matarbari, including Dhalghata, Panir Sara, Mohori Guna, Matarbari, Uttar Nalbila, Kaliganj,

Kalarmarchara, Hoanok, Amavasyakhali, and Moheshkhali under Cox's Bazar District (FFC, 2023). Around 20,000 people have already been displaced by the Matarbari 1200 MW coal power plant component alone, losing their homes, businesses, schools, mosques, and burial grounds without meaningful consultation or compensation frameworks (Selim et al., 2023). There have been no consultation on the MIDI Master Plan also, which triggers another mass-displacement.

3.2 Children and Antenatal Death

The MIDI Master Plan's infrastructure development will cause severe waterlogging, threatening both agricultural sustainability and child survival in the region. The construction of the Matarbari 1200 MW Coal Power Plant, a core MIDI component, has already demonstrated these deadly consequences ([Reliefweb, 2018](#)).

During the 2018 monsoon, the construction works blocked all 10 sluice gates in Matarbari Union, resulting in catastrophic waterlogging. Most devastatingly, five children drowned in the floodwaters, according to reports from affected community members, while seven school children were severely injured in a



boat sinking incident during their commute from school ([Mehedi, 2018](#)). Additionally, two newborn babies died due to a lack of treatment during delivery, as the stagnant water prevented pregnant women from reaching healthcare facilities.

3.3 Livelihood Destruction



(c) Songshotaque (Agradut Dasgupta)

Salt Collection is the major livelihoods in Matarbari

The economy of Moheshkhali is deeply rooted in salt cultivation and shrimp farming. These are not just jobs; they are lifestyles tied to the specific geography of the tidal flats. Converting salt pans into industrial land destroys the community's primary economic engine. Displaced salt farmers possess specialised skills that are not transferable to industrial labour.

Experience from the Matarbari Phase-I acquisition shows that the compensation process is fraught with corruption.

Reports indicate that affected persons often have to pay 30% of their compensation as bribes to officials to release funds ([350.org, 2022](#)). Furthermore, landless labourers and sharecroppers, who make up a significant portion of the workforce, receive no compensation for their lost livelihoods.

While the project promises 150,000 jobs, residents have largely been excluded from construction jobs in Phase I, which went to outsiders or migrant workers. Of the 1,057 people displaced from the first site, only a fraction found alternative employment ([350.org, 2022](#)).

3.4 Impact on Public Health



Severe air pollution is one of the burning issues in Bangladesh. Photo: Unicef

The MIDI Master Plan will generate severe air quality degradation and associated respiratory health crises, with particularly

devastating consequences for children (JACSES, 2025). The plan's 13 GW of new LNG power plants and existing coal power plants will emit substantial quantities of PM2.5, sulfur dioxide, nitrogen oxides, and other toxic pollutants. Pregnant mothers, children under five years, elderly populations, and individuals with comorbidities such as diabetes and respiratory conditions are most vulnerable to air pollution's harmful effects (Reza et al., 2022).

3.5 Violation of Local Rights

While not strictly an indigenous population in the tribal sense, the distinct coastal culture of the Matarbari people is being erased. The lack of Free, Prior, and Informed Consent (FPIC) violates international human

rights standards. The exclusionary nature of the planning process, in which decisions are made in Tokyo or Dhaka without the participation of the people, constitutes a procedural violation of their human rights.

3.6 Potential Corruption

Implementation of the MIDI Master Plan is severely compromised by governance failures and confirmed corruption, threatening the project's integrity. The Matarbari 1200 MW coal power plant, a MIDI project, has been the site of multiple corruption scandals. These cases—involving tender rigging, procurement manipulation, and large-scale embezzlement—highlight systemic governance weaknesses, driven by a lack of transparency, weak accountability, and politicised implementation, which divert resources from development objectives.



Matarbari Coal Power Plant has always been under the radar due to its corruption, started from the land acquisition process and continued to the coal purchase. Photo: Textile Today





4 ENVIRONMENTAL IMPACTS

Bangladesh might face a Carbon Catastrophe

The environmental footprint of the MIDI Master Plan is catastrophic. According to the Market Forces and other environmental groups, the proposed LNG and fossil fuel buildout in the Matarbari will release 1.3 billion tonnes of CO₂e over its operational lifetime (FFC, 2024a). It is roughly six times Bangladesh's current total annual emissions.

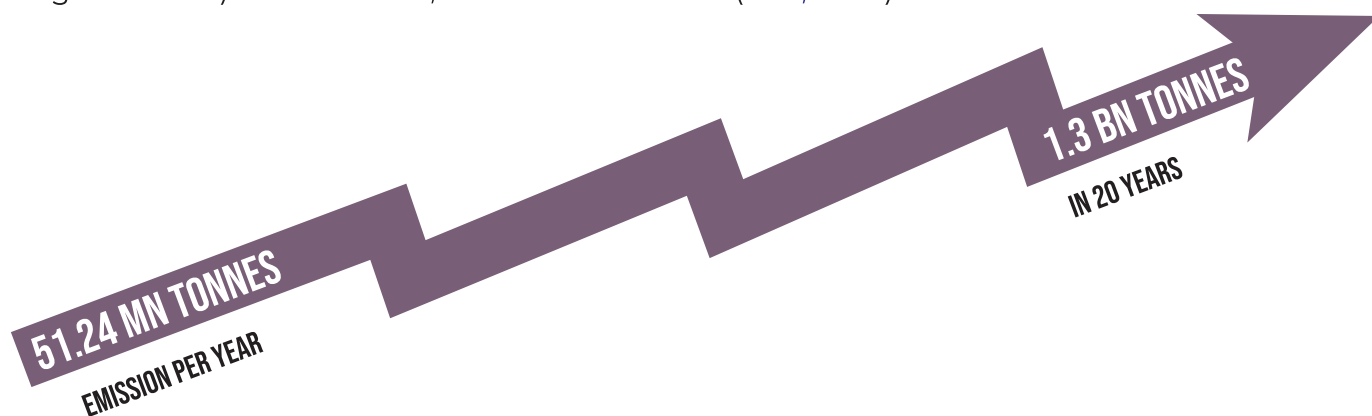
a) Methane Factor

Recent studies indicate that when the full lifecycle (extraction, transport, liquefaction, regasification) is considered, LNG can have a

greenhouse gas footprint 33% worse than coal over a 20-year timeframe due to methane leakage (Friedlander, 2024). JICA's portrayal of LNG as a clean bridge fuel is scientifically dishonest.

b) Policy Contradiction

Proceeding with this plan makes it impossible for Bangladesh to meet its Nationally Determined Contributions (NDCs) under the Paris Agreement or the goals of the Bangladesh Climate Prosperity Plan (TBS, 2023).



4.1 The Kohelia River Destruction

The physical implementation of the Matarbari project has already caused irreversible ecological damage, specifically to the Kohelia River. To build access roads for the power plant, a 7.4 km stretch of the Kohelia River was filled with sand and dredged soil (DT, 2021).

It was done in violation of the Environmental Impact Assessment (EIA) and despite High Court orders to stop illegal filling. The river blockage has disrupted the island's natural drainage system, leading to permanent waterlogging.

During the monsoon, it exacerbates flooding, while in



Due to heavy infrastructure and encroachment, the Kohelia River is now only a dead water channel. Photo: Agradut Dasgupta (Songshaptaque)

the dry season, it prevents freshwater flow, increasing soil salinity and rendering agricultural land barren (WKB, 2022). This destruction has wiped out the breeding grounds for aquatic species, collapsing the local fishery.

4.2 Air and Water Pollution

The concentration of thermal power plants, including both existing coal and planned LNG plants, will create a toxic airshed. The coal plant alone generates thousands of tons of coal ash containing mercury, lead, and arsenic.

While JICA promised a contained ash pond, satellite imagery suggests proximity to

the river and potential for leaching (Noor & Noor, 2022). Moreover, modelling indicates that JICA's EIA used flawed baselines to downplay the impacts of NO_x and SO_x emissions (FFC, 2022).

The cumulative effect of the Power Hub will lead to respiratory health crises for the local population.

4.3 Impacts on Migratory Birds

Matarbari Island occupies a critical geographic position within two of Asia's most significant migratory bird routes, the Central Asian Flyway and the East Asian-Australasian Flyway (Molin, 2025). The nearby Sonadia Island, a coastal sanctuary located approximately 9 square kilometres, demonstrates the ecological importance of

this region, hosting an average of 25,000 migratory birds annually during the winter season. These wetland and coastal habitats function as critical refuelling and resting stations, allowing exhausted birds to recover before continuing their long-distance migrations. These birds are also found in the Matarbari islands.

Among the internationally important bird species utilising these habitats are the critically endangered Spoon-billed Sandpiper (*Calidris pygmaea*), of which 25 individuals have been recorded at Sonadia Island. The equally threatened Nordmann's Greenshank (*Tringa guttifer*), with only 500 to 1,000 individuals remaining globally, has been documented with peak counts of 28 individuals at Sonadia Island (Chowdhury et al., 2011).

Additional threatened and vulnerable species include the Great Knot (*Calidris tenuirostris*), Black-tailed Godwit (*Limosa limosa*), and Eurasian Curlew (*Numenius arquata*). These mudflats and coastal ecosystems are essential for the survival of these species, as they provide invertebrate-rich feeding grounds where birds can forage on small organisms that accumulate in intertidal areas (CLEAN, 2025).



(c) Baz Scampion

4.4 Marine Ecosystems

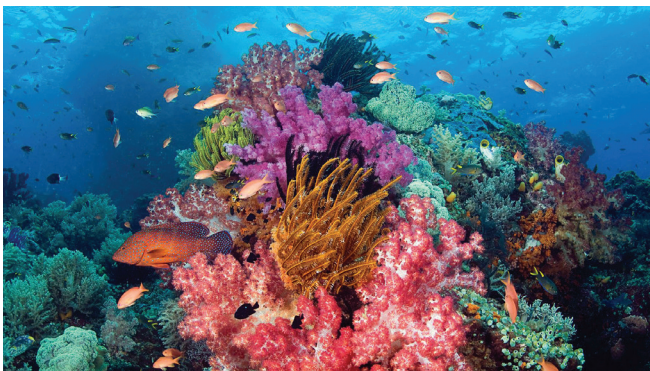


Photo: Bangladesh National Conservation Strategy (2023)

The MIDI Master Plan threatens marine ecosystems through multiple interconnected mechanisms. This thermal pollution disrupts fish breeding cycles, reduces dissolved oxygen levels critical for aquatic life, and creates stress in temperature-sensitive organisms.

The Kohelia River estuary at Matarbari serves as a vital fish nursery and breeding ground. Surveys documented 56 phytoplankton and 27 zooplankton species, as well as diverse benthic communities in the river.

Dredging has already altered plankton composition, indicating ongoing environmental damage. Port operations increase maritime traffic, creating acoustic disturbance, propeller strikes, and wave action that further disrupts fish reproduction and development. Mangrove forests, essential for juvenile fish nurseries and supporting invertebrate diversity, face additional coastal erosion from increased wave action caused by dredging and deepening.



(c) Agradut Dasgupta

5 ECONOMIC PERIL

The High Cost of the LNG Trap

By selecting Option B (LNG+Solar), the Master Plan tethers Bangladesh's industrial future to the volatile global LNG market. The consequences of this dependency are already visible:

a) Tariff Hikes

Reliance on spot-market LNG forced the government to raise gas tariffs by up to 179% in 2023, fueling inflation and increasing the cost of doing business, ultimately reducing the market competitiveness of Bangladeshi companies (Alam, 2025).

b) Fiscal Bleeding

The government allocated BDT 9,000 crore (USD 738 million) for LNG imports in FY 2025-26 alone (Alam, 2025), while paying BDT 6,357 crore (USD 521 million) in subsidies in 2024-25 (Rahman, 2025). Expanding LNG capacity at Matarbari will exponentially increase this subsidy burden.

c) Capacity Payments

Based on the current rate of capacity charges, the country will have to pay USD 2.61 billion per year to the LNG power plants to be built under the MIDI Master Plan, amounting to USD 57.34 billion over the next 20 years.

Additionally, around USD 82 million in annual capacity charges will be paid for the LNG terminals, totalling USD 1.8 billion over their 20-year lifespan.

d) Balance of Payments Crisis

Projections indicate that by 2041, the cost of importing LNG could reach USD 7-11 billion annually (FFC, 2024a). For a country already grappling with foreign reserve shortages, this level of capital flight is unsustainable and risks a sovereign debt crisis.

The Government can spend the money for human development and critical infrastructures, such as academic institutions, RE institutions and hospitals.

5.1 Opportunity Cost of Inefficiency

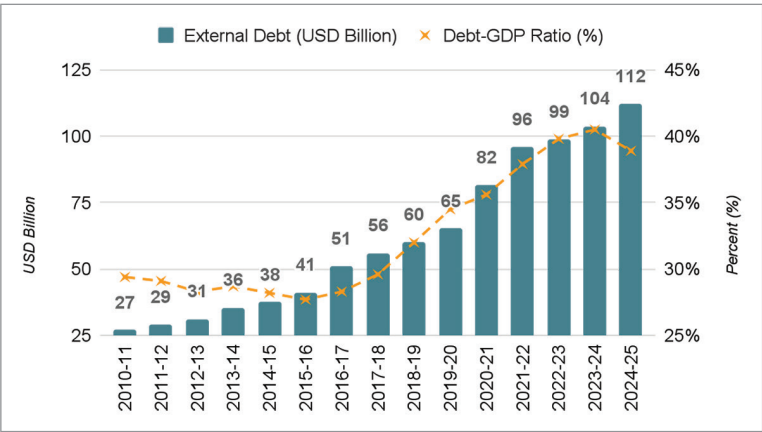
According to the IEEFA, simply improving energy efficiency in the industrial sector could save USD 460 million annually in LNG imports (Alam, 2024). The capital planned for the massive LNG infrastructure could yield far higher economic returns if invested in grid modernisation, efficiency upgrades, and

domestic renewable generation. JICA's plan ignores these demand-side solutions in favour of supply-side expansion that benefits foreign contractors. Energy experts and economists have already expressed concern that this initiative would lead to the Payra Power Hub's failure (Bonik Barta, 2025).

5.2 Debt Sustainability

The total investment for MIDI is estimated at USD 60-65 billion over 30 years. A significant portion of this will be debt-financed. The Matarbari Coal Power Plant (Phase 1) has already seen massive cost overruns, making it one of the most expensive coal plants in the world (350.org, 2022). Adding tens of billions more in debt for LNG infrastructure, assets that risk becoming stranded as the world decarbonises, is a fiduciary failure. The soft nature of JICA loans (low interest) does not negate the principal repayment burden, which will strain the national budget for decades.

Figure 2. External Debt of Bangladesh (2011-2025)





(c) CLEAN (Sajjad Hossain Tuhin)

6 CONCLUSION

Summary of the Findings and Recommendations

The Moheshkhali-Matarbari Integrated Development Initiative (MIDI), in its current form, is a project that fundamentally serves foreign geopolitical and commercial interests at the expense of Bangladesh's constitutional integrity, economic

sovereignty, environmental stability, and social justice. The MIDA Ordinance creates an unaccountable super-authority that dismantles local democracy, while the Master Plan locks the nation into a disastrous fossil fuel trajectory.

6.1 Summary of Findings

- a) **Unconstitutional Governance:** MIDA violates Article 59 of the Constitution by usurping the powers of elected local governments. The use of an ordinance to create such a body lacks democratic legitimacy.
- b) **Jurisdictional Conflict:** The Authority creates unworkable conflicts with the Chattogram Port Authority (CPA) and the Cox's Bazar Development Authority (COXDA), paralysing administrative functions.
- c) **Economic Trap:** The project prioritises expensive LNG imports over domestic renewables, threatening long-term fiscal stability and creating an unsustainable subsidy burden.
- d) **Ecological Catastrophe:** The MIDI Master plan will cause the emission of 1.3 billion tonnes of CO₂ and the physical destruction of the Kohelia River ecosystem.
- e) **Social Injustice:** The forced displacement of 116,000 people without viable rehabilitation is a gross violation of human rights.

6.2 Recommendations

Based on the key findings, the following actions are recommended:

1. Repeal the MIDA Ordinance

The Government should immediately repeal the MIDA Ordinance. Development planning should revert to the constitutionally mandated local government bodies, in coordination with existing statutory authorities such as the CPA and the COXDA.

2. Cancel the MIDI Master Plan

The current Master Plan, formulated by JICA with a bias toward Liquefied Natural Gas (LNG), should be cancelled immediately.

3. New Strategic Environmental Assessment (SEA)

An independent SEA, free from JICA influence and involving genuine civil society participation, should be conducted. This assessment must consider the cumulative

impacts of all proposed projects.

4. Prioritise Renewables

The region's energy strategy should be rewritten to prioritise the 9,800 MW of wind potential and solar capabilities, and to invest in grid modernisation rather than LNG terminals.

5. Restore the Kohelia River

Immediate ecological measures must be taken to dredge and restore the river's flow to alleviate waterlogging and restore the local ecosystem.

6. Moratorium on Land Acquisition

A strict moratorium on further land acquisition in Moheshkhali and Matarbari should be imposed under long-term land-leasing guidelines until a transparent, rights-based resettlement and rehabilitation framework is established.

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