



Governing Climate Migration in Bangladesh: An Exploratory Analysis of Policies, Institutions, and Adaptation Challenges

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ABSTRACT

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While Bangladesh is one of the countries most vulnerable to climate-induced human mobility, the governance of human mobility has received much less attention than the drivers of mobility. This article poses the question of how the country's policy framework, institutional mandates, and adaptation constraints shape (or do not shape) the governance of climate-induced internal migration. An exploratory qualitative design is used, with codebook thematic analysis of 71 policy, legal, international organization, scholarly, and civil society documents from 2009 to 2026, based on multi-level governance theory and reported using the Standards for Reporting Qualitative Research and the READ approach to policy document analysis. Climate mobility is widely acknowledged in policy language, and poorly regulated in practice. There are six ministries, each of which has part of a mandate, but not the whole. The Delta Plan 2100 defines out-migration as failure and introduces targets for reducing it; the National Adaptation Plan (NAP) considers climate migrants as an attribute of an urban intervention, and the Third Nationally Determined Contribution (2025) mentions displacement as one of the national circumstances, but has no specific mobility or planned-relocation measure among its 65 adaptation interventions. The remit for in-migration is not statutory for local government, where it takes place, nor do they have the fiscal power to have one. The article introduces the concept of a mandate vacuum, a development of the multi-level governance theory, which assumes competencies to be distributed, and compares it to the most similar previous study of multi-level adaptation governance in Bangladesh, and presents it as a series of six sequential reforms with indicators, baselines, and a political feasibility assessment.

KEYWORDS:

Climate migration, Bangladesh, internal displacement, Adaptation policy, Multi-level governance.

1. INTRODUCTION

1.1 Background and Context

Bangladesh is one of the most vulnerable climate change locations in the world. Its low-lying deltaic plain, coupled with the monsoon-dependent hydrology and long coastline along the Bay of Bengal, makes it vulnerable to flooding, cyclones, storm surges, riverbank erosion, and salinity intrusion (Intergovernmental Panel on Climate Change [IPCC], 2022).

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This exposure is very concentrated, as the 2022 census counted 165,158,616 people at a density of 1,119 persons per square kilometre, compared to 976 persons per square kilometre in 2011 (Bangladesh Bureau of Statistics [BBS], 2022). Risk rankings have changed compared to each other. The Global Climate Risk Index 2021 was the last edition, where Bangladesh was ranked the 7th most climate change-impacted country for the period 2000-2019 (Eckstein et al., 2021). According to the updated methodology, the country has been ranked 31st in the Climate Risk Index for 1993-2022 and 13th in the Climate Risk Index for the long-term (2026), and the mortality from cyclones has decreased by over a hundred times in the last 40 years (Germanwatch, 2025, 2026). This is not a decrease in exposure, but an achievement:

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Bangladesh has solved the mortality issue, but not the settlement issue.

A significant amount of mobility is observed; it is variable and often reported in units that are confusing. In 2024, the Internal Displacement Monitoring Centre (IDMC) reported some 2.4 million disaster-induced movements (not persons) in the country, the fifth largest in the world, which decreased to about 105,000 in 2025 (IDMC, 2025, 2026). The persons-based counterpart was only released in December 2025 by the International Organization for Migration (IOM), which estimated a total of 4,955,527 persons currently displaced, 63% of whom were displaced before April 2020 (IOM, 2025).

Consequently, projections to 2050 vary, and are not successive updates of one projection (Figure 1): 19.9 million (the upper bound of Groundswell's pessimistic reference scenario, Rigaud et al., 2018), 13.3 million (ensemble mean of the Groundswell pessimistic reference scenario, with updated baselines, Clement et al., 2021), and more than 22 million (agent-based modelling, O'Neill et al., 2025). Slow-onset migration due to salinity and sea-level rise is different from rapid-onset migration due to cyclones, and many households at risk are stuck (Ayeb-Karlsson et al., 2018; Mallick & Schanze, 2020).

The scale of climate-induced human mobility in Bangladesh: observed movement, displaced stock, and projections to 2050

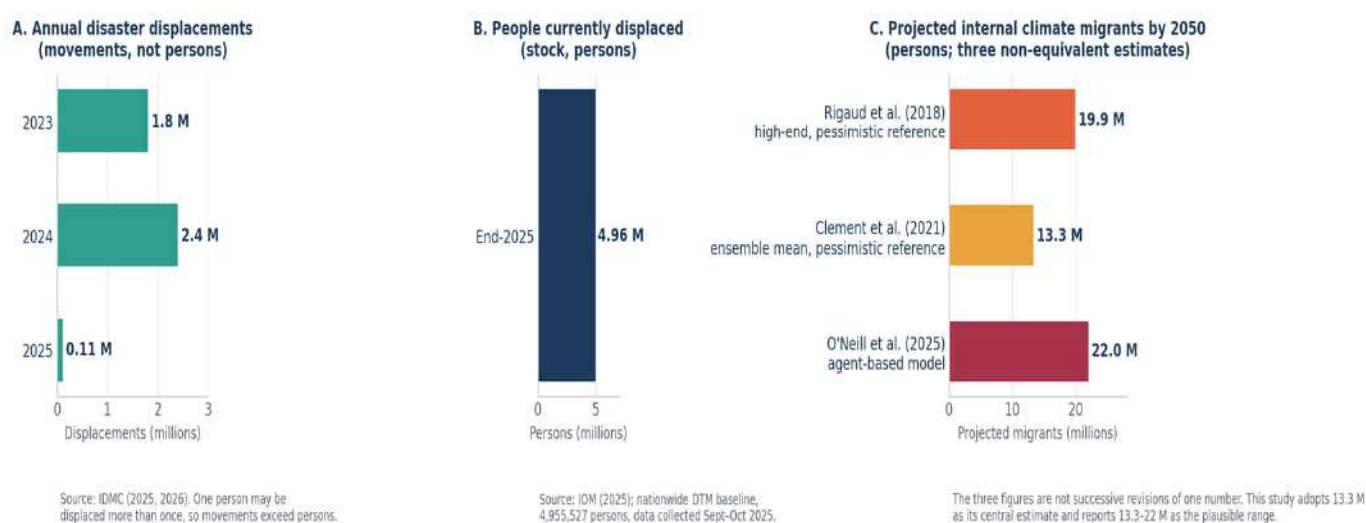


Figure 1: The Scale of Climate-Induced Human Mobility in Bangladesh: Observed Movement, Displaced Stock, and Projections to 2050

Note. Panels A and B report different units and are not comparable: Panel A counts movements, Panel B counts persons displaced at a point in time. Panel C reports three estimates produced under different models, scenarios and reporting conventions. Sources: IDMC (2025, 2026); IOM (2025); Rigaud et al. (2018); Clement et al. (2021); O'Neill et al. (2025).

1.2 Problem, Research Gap and Contribution

There is no policy framework in place for internal migration due to climate change in Bangladesh. Its main climate and development tools tackle adaptation in a holistic way, but do so only indirectly when it comes to migration, often seeing it as a sign of adaptation failure, and not as a process that can be governed (Vanhala & Calliari, 2022). This is compounded by the fact that mandates related to climate mobility are spread across the ministries of environment, disaster management, land, housing, local government, and overseas employment, and none of these ministries has a coordinating remit, meaning migration governance is not owned by any of these ministries (Gupta et al., 2025).

Research has focused on the drivers and patterns of migration, and governance responses have been less studied (Rana & Ilina, 2021). The claim needs to be qualified, as there is a governance literature, which this article builds on: Ishtiaque et al. (2021) analyze multi-level adaptation

governance in coastal Bangladesh, revealing a governance authority concentrated at the national level under elite pluralism; Kisinger and Matsui (2021) assess the policy architecture relevant to displacement; Naser et al. (2019) advance a rights-based reading; Huq and Shafique (2023) demonstrate a discursive partition of climate-affected dwellers from urban policy.

There are three things that are not completed, and that is what this study will contribute to. First, no existing study has conducted a multi-level governance analysis of climate mobility itself, but of adaptation in general: Ishtiaque et al. (2021) show that the national level dominates adaptation networks, not whether or not any level has competence in adaptation. Second, the governance literature is earlier than the current instruments that define the governance field: the National Adaptation Plan 2023-2050, the Third Nationally Determined Contribution of 2025, the Global Compact action

plan for 2026-2030, and the first nationwide measurement of displaced stock. Third, the international-domestic interface is not well explored, especially in the context of the operationalization of the Fund for Loss and Damage from 2025.

1.3 Research Questions and Objectives

This study is guided by four questions:

RQ1: What is the nature of the climate and disaster policies and policies in Bangladesh, and how do they or do not consider climate-induced migration?

RQ2: What institutional mechanisms are there, and what are the gaps?

RQ3: What are the adaptation challenges to effective governance?

RQ4: What are the influences of international frameworks on domestic governance, and what are the conflicts between international frameworks and local realities?

The related objectives are to map the policy landscape, assess institutional capacity, identify adaptation constraints, and to examine the international-domestic interface.

2. LITERATURE REVIEW AND CONCEPTUAL FRAMEWORK

2.1 Climate Migration: Definitions, Debates and Typologies

Climate refugee, climate-displaced person, and environmental migrant are terms that are used interchangeably and have governance implications: the vocabulary of climate migration is unsettled, and the ambiguity has governance consequences (Gupta et al., 2025). Climate change-induced migrants are not considered refugees under the 1951 Convention, and the lack of a clear category makes it unclear who is responsible. Thus, scholars situate migration along a continuum from voluntary to forced migration, and question if migration is a form of adaptation or adaptation failure (Naser et al., 2019). Some populations are immobile, creating trapped populations, which is an adaptation dynamic in itself (Khatun et al., 2022).

2.2 Multi-Level Governance and the International Architecture

A fruitful lens to consider the distribution of authority over climate mobility across scales and the influence of power asymmetries on coordination and its failure is multi-level governance (MLG) theory (Di Gregorio et al., 2019). Hooghe & Marks (2003) make a distinction between Type I governance (authority is concentrated in a small number of general-purpose, non-overlapping, durable jurisdictions, nested in tiers) and Type II governance (authority is located in many task-specific, overlapping jurisdictions). The climate architecture of Bangladesh is strongly Type I, and climate mobility is a task-specific issue that is trans-jurisdictional. However, the polycentricity literature also states that effective climate action can result from a number of semi-

autonomous decision centres (Ostrom, 2010; Jordan et al., 2015), but assumes that these decision centres have authority over the problem.

There are several international instruments that recognize climate mobility: the Nansen Initiative Protection Agenda, which was endorsed by 109 governmental delegations (Nansen Initiative, 2015); the Global Compact for Safe, Orderly and Regular Migration, the first migration-focused instrument to recognize environmental drivers (United Nations, 2018); the Sendai Framework; and the loss and damage provisions of the Paris Agreement. None of these are binding, and there is no binding regime to protect climate migrants (Gupta et al., 2025). The architecture is also called into question for being North-centric and geared towards cross-border mobility, when the majority of climate mobility is intraregional and South-South (Naser et al., 2019).

2.3 Climate Migration in Bangladesh: Empirical Landscape, Projections and Their Epistemology

The migration corridors are mostly coastal-to-urban, rural-to-peri-urban, and there is also a cross-border dimension with distress migration and exploitation towards India (Bharadwaj et al., 2025). Slow-onset salinity intrusion is a strong force in the south-west, destroying agrarian livelihoods (Khatun et al., 2022; Mallick et al., 2022), and displaced people flock to Dhaka, where they reside in informal settlements with precarity, exclusion from services and gendered vulnerability (Khanom et al., 2022).

The three main 2050 projections need to be reconciled, as they are often reported as if one were replacing the other. Rigaud et al. (2018) cite 19.9 million as the maximum of the pessimistic reference scenario; Clement et al. (2021) cite 13.3 million as the ensemble mean of the pessimistic reference scenario (but do not re-compute it, just re-quote it); and O'Neill et al. (2025) cite more than 22 million from an agent-based model, which is more than double previous agent-based estimates and may reflect a low threshold for migration. The central estimate for this study is 13.3 million, and the plausible range is 13.3–22 million. There is no governance argument that hinges on which is right: no institutional setup to receive movement of either of these magnitudes.

Projections are not neutral inputs to governance, but a form of knowledge with political impacts, and an argument that problem definition is externally produced should not simply take the numbers on faith. Circulated figures reproduce myths that outpace the evidence, as Boas et al. (2019) argue, and are amenable to securitized responses, while Piguet (2022) warns against mono-causal accounts, Wiegel et al. (2019) propose a mobility perspective to replace the push and pull logic of projection models, and Bettini (2013) and Baldwin et al. (2019) trace the discursive work such narratives perform.

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Thus, projections are considered as governance artefacts, and are analyzed in Section 4.4.

2.4 Policy and Institutional Responses: What Prior Studies Establish

An increasing body of literature has been assessing the policy architecture in Bangladesh (Kisinger & Matsui, 2021). A common theme is fragmentation, with overlapping mandates,

poor coordination, and a lack of financing, authority, and capacity of local government bodies to respond. Scholars also contend that these instruments rarely reflect an approach based on the rights of IDPs (Naser et al., 2019), and gender and governance of the reception areas are still missing (Khanom et al., 2022). Table 1 compares this work with the five most recent works that are most similar.

Table 1: What This Study Adds: Positioning Against the Five Closest Prior Studies

Study, focus and method	What it establishes	What it does not address
Ishtiaque et al. (2021). Social network analysis of coastal flood adaptation actors	National-tier concentration of decision authority; elite pluralism; weak vertical and horizontal coordination	Whether any tier holds a mobility competence; migration as an object of governance; fiscal instruments
Kisinger and Matsui (2021). Governance appraisal of displacement-relevant policy	Fragmented mandates and weak implementation across climate and disaster instruments	Instruments adopted after 2021; the reception side; costed reform pathways
Naser et al. (2019). Legal and human-rights analysis of migration governance	Absence of a rights-based approach to internally displaced persons in Bangladeshi law	Institutional mandate mapping; climate finance architecture; local-tier capacity
Chakma and Matsui (2022). Perceptions of local officials, south-east coast	Local officials' understanding of climate-victim management constraints	National policy architecture; the international-domestic interface
Huq and Shafique (2023). Critical discourse analysis of urban policy	A discursive partition excluding climate-affected dwellers from urban belonging	Institutional mandates; coordination structures; finance
This study. Codebook thematic analysis of 71 policy, legal, IO, scholarly and civil society documents, 2009–2026	Key contribution: The local tier is not a weak participant in mobility governance but a non-participant a mandate vacuum. Fragmentation is reproduced structurally by sectoral budgets, accountability and evidence.	Implementation practice, budget execution and stakeholder perception, which require primary data (§7.2)

Note. Ordered by proximity to the present study's object of analysis. IO = international organization. Source: authors' construction from the studies cited.

2.5 Derivation of the Conceptual Framework

The framework has been developed based on the previous review. The policy architecture pillar is a result of Sections 2.1 and 2.4: naming and framing of mobility are policy architecture; what is governable is dependent on this. The institutional mechanisms pillar is based on the fragmentation findings of Kisinger and Matsui (2021) and Ishtiaque et al. (2021) and the findings of Section 2.2: if there is a fragmentation of authority across Type I jurisdictions, the

crucial question is whether any tier has the competence. The adaptation challenges pillar is a consequence of the finance, urban reception, gender, livelihoods, and legal status pillars, which are all the constraints that any mobility mandate would face, so their treatment is diagnostic of the presence of a mobility mandate. The pillars are embedded in international frameworks whose expectations are unevenly translated (Kälin, 2018), and the structure is recursive (Figure 2).



Figure 2: Integrated Policy–Institution–Adaptation Framework for Climate Migration Governance in Bangladesh

Note. The diagram depicts the nested, multi-scalar governance of climate migration in Bangladesh and the recursive feedback loop linking adaptation outcomes to migration and the resulting pressure on governance. Source: authors' construction.

3. METHODOLOGY

3.1 Research Design and Reporting Standards

The type of this study is exploratory type with a qualitative approach that uses a documentary analysis technique. Climate-induced migration governance in Bangladesh is a nascent and under-theorized area, with key instruments being recent, overlapping mandates and a vague concept of migration–adaptation in law. Document analysis is appropriate for policy processes that have a lot of paper (Bowen, 2009; Dalglish et al., 2020).

The approach used is codebook thematic analysis, which allows an a priori structure but remains with an interpretative orientation (Braun & Clarke, 2021), and directed qualitative content analysis (Hsieh & Shannon, 2005; Gale et al., 2013). The variant is intentionally identified as reflexive thematic analysis is open coding without a framework, whereas the coding-reliability and codebook variants involve codebooks and multiple coders (Braun & Clarke, 2019, 2021). The study is based on the multi-level governance theory (Di Gregorio et al., 2019; Hooghe & Marks, 2003). Reporting is done using the Standards for Reporting Qualitative Research (O'Brien et al., 2014), and the completed checklist is provided as

supplementary material and mapped in Appendix D; the four READ steps of Dalglish et al. (2020) are reported below.

3.2 Corpus Construction, Screening and Eligibility

The corpus is the data set in a documentary study and is reported as such, rather than as a range, as N = 71 documents across five source categories, listed in Appendix A by issuing body, year, document type and URL (with access date). During the reading of the materials (READ step one), peer-reviewed articles were identified using Boolean combinations of climate migration, climate-induced displacement, adaptation, governance, policy and Bangladesh, with verbatim strings, databases and dates of search and hits per database listed in Appendix B; policy, legal and grey-literature documents were retrieved from official portals and agency repositories and required a substantive focus on Bangladesh and to be in English. The date range was 2009–2026 for policy and legal documents and 2018–2026 for scholarships (with four earlier documents included as foundational). The categories, criteria, and exact counts are reported in Table 2, Panel A, and the screening workflow in Figure 3.

Table 2: Document Corpus and Analytical Coding Frame

Panel A. Document Corpus (N = 71): Source Categories, Inclusion Criteria, and Exact Counts

Source category	Examples and inclusion criteria	N
National policy, strategy and plan documents	BCCSAP 2009; Bangladesh Delta Plan 2100; NAP 2023–2050; NDC 2021 and NDC 3.0 (2025); SOD 2019; NPDM 2021–2025; NSIDM and Action Plan; GCM National Action Plan 2026–2030. Official government publications addressing climate, disaster, migration, or displacement (2009–2026).	12
Legislative texts	Disaster Management Act 2012; Climate Change Trust Act 2010; Overseas Employment and Migrants Act 2013; relevant local government statutes. Enacted legislation relating to displacement, resettlement, adaptation, migration governance, or local government authority.	5
International organization and comparative government documents	World Bank; IPCC; IOM; IDMC; ADB; Germanwatch; FRLD; GCF; UN agencies; Republic of Fiji. Credible international bodies or comparator governments addressing climate mobility and governance.	18
Peer-reviewed literature	Scopus- and Web of Science-indexed journal articles published 2018–2026 (four foundational exceptions). English-language studies addressing governance, policy, or institutional dimensions of climate mobility.	31
NGO, civil society and press-of-record sources	IIED; Transparency International Bangladesh; BSS; The Daily Star. Sources from organizations with documented Bangladesh presence and published methodology; press included only for government actions not otherwise documented.	5
Total corpus	Complete document set analyzed	71

Panel B. Analytical Coding Frame: Organizing Themes, Code Origin, and Sub-Codes

Organizing theme	Sub-codes	Origin
Policy architecture	Policy coverage; migration framing; adaptation–migration nexus; policy coherence; gaps and silences	Deductive
Institutional mechanisms	Mandate clarity; inter-ministerial coordination; local government capacity; NGO and IO roles; fiscal instruments	Deductive
Adaptation challenges	Financing allocation; financing disbursement; urban governance; gender; livelihood security; legal protection; land and tenure	Deductive
International–domestic interface	Framework adoption; norm translation; development conditionality; evidentiary dependence	Deductive
Inductive codes	Mobility framed as failure; assumption of return; portability of entitlement; measurement absence; narrative incompatibility	Inductive

Note. Counts are exact, not indicative. Every document in categories 1, 2, 3 and 5 is enumerated in Appendix A; the 31 peer-reviewed articles are the substantive journal entries in the reference list. A further 15 methodological and theoretical works were cited to justify the design but not coded. The deductive frame comprises 21 sub-codes across four organizing themes; five further codes were generated inductively (Appendix C). BCCSAP = Bangladesh Climate Change Strategy and Action Plan; FRLD = Fund for responding to Loss and Damage; GCF = Green Climate Fund; GCM = Global Compact for Migration; NAP = National Adaptation Plan; NDC = Nationally Determined Contribution; NPDM = National Plan for Disaster Management; NSIDM = National Strategy on Internal Displacement Management; SOD = Standing Orders on Disaster. Source: authors' construction.

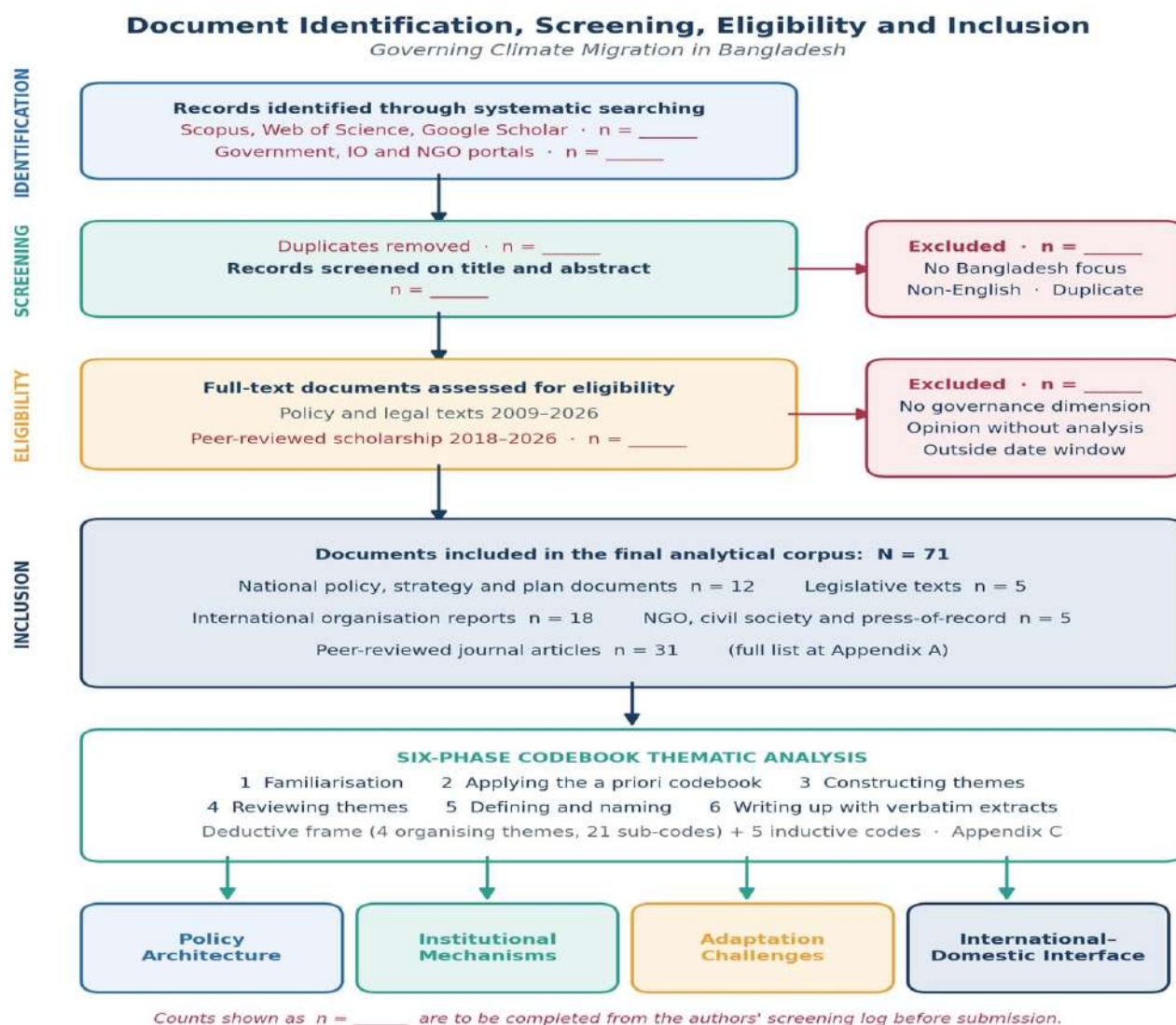


Figure 3: Document Identification, Screening, Eligibility and Inclusion

Note. The workflow is reported in PRISMA-style stages adapted for documentary policy analysis, with exclusion reasons given at each stage. The final corpus and its category composition are exact. Source: authors' construction.

3.3 Analytical Approach, Coding and Coder Procedure

The process of extracting and analyzing the data (READ steps two and three) was carried out following the six phases of thematic analysis (Braun & Clarke, 2006) in codebook format (Braun & Clarke, 2021, 2022): familiarization; application of the a priori codebook; construction of candidate themes; review against coded extracts; definition and naming; and writing up with verbatim evidence. The organizing frame (Table 2, Panel B) was drawn deductively from the three-pillar framework of Section 2.5, and resulted in four themes with 21 sub-codes. The inductive coding process resulted in five codes, which are presented in Appendix C and were kept because they appeared in four or more documents.

The first author coded the data in NVivo 14, using structured extraction, verbatim data retention with page numbers, and analytic memo-writing, according to the guidelines for codebook development (Roberts et al., 2019). A 20%

stratified subsample was coded independently by the second author across all five source categories, with any disagreements discussed and a one-time change in the codebook, which involved separating an initial financing code into allocation and disbursement. Agreement was not used as a reliability measure but as a measure to ensure clarity of code definitions (Braun & Clarke, 2021).

4. FINDINGS

The coded corpus was used to create four organizing themes, which answered one research question each. In all four, a common theme emerges: climate migration is broadly recognized in policy and poorly regulated in practice in Bangladesh. This section summarizes the documents, what they say and what they don't say.

4.1 Theme 1: The Policy Landscape between Recognition and Neglect (RQ1)

4.1.1 Climate change policies and the framing of migration

The Bangladesh Climate Change Strategy and Action Plan was the first to link climate change to displacement, and to recommend monitoring migration and providing support to displaced households (Ministry of Environment and Forests [MoEF], 2009). The commitment stops there: no agency is designated, no budget line is provided, and no procedure is outlined (Kisinger & Matsui, 2021).

The Delta Plan 2100 is a scaled-up version of this framing. In its ‘business-as-usual’ scenario, it sees out-migration as a sign of policy failure, and the plan says that “full implementation would ‘reduce urban migration by about 60 per cent’” (General Economics Division [GED], 2018). Planned relocation is mentioned in the hotspot investment and the economic-zone language, but no reception mechanism, eligibility criterion, or responsible agency is mentioned for those who move (Naser et al., 2019).

The greatest progress is the National Adaptation Plan (2023-2050). It acknowledges the presence of climate migrants in Goal 3, ‘Develop climate-smart cities for improved urban environment and well-being’ (Ministry of Environment, Forest and Climate Change [MoEFCC], 2022) and calls for city climate action plans that focus on strengthening the resilience of the urban poor and climate migrants. Migration is, however, not a named adaptation strategy, but rather an attribute of an urban intervention.

There is a need for more precise findings in the Nationally Determined Contributions. The 2021 update does not mention any content on human mobility (MoEFCC, 2021), and the Third Nationally Determined Contribution of September 2025 refers to displacement in the chapter on national circumstances, stating that “crop loss, damage to infrastructure, and displacement, continue to present major obstacles” to sustaining development gains (Government of Bangladesh, 2025). It has 65 adaptation interventions, none of which is a human-mobility, reception, or planned-relocation programme. The NDC does say nothing about mobility; it recognizes it but does not have any instrument to govern it.

4.1.2 Disaster management policies and displacement

Bangladesh has a temporary approach to managing displacement. The Standing Orders on Disaster focuses on warning, evacuation, shelter, and relief based on the assumption of return (Ministry of Disaster Management and Relief [MoDMR], 2019), whereas the Disaster Management

Act 2012 and the National Plan for Disaster Management 2021-2025 have given preparedness and response responsibilities without long-term settlement (MoDMR, 2021a). Thus, permanent displacement is not within the scope of the ministry that has the mandate to deal with it (Chakma & Matsui, 2022).

One instrument is not in the pattern. The National Strategy on Internal Displacement Management covers pre-displacement, displacement, and durable solutions, and includes a commitment by the state to “a comprehensive and realistic rights-based framework that respects, protects and ensures the rights” of disaster and climate-induced internally displaced persons (IDPs) (MoDMR, 2021b). The National Action Plan (2022–2042) also includes an inter-ministerial task force (MoDMR, 2022). The draft strategy from 2015 and the instrument from 2021 are not two, but one. The strategy has been poorly implemented, with the action plan of the strategy not being funded, and the formulation of the strategy criticized as being top-down (Kisinger & Matsui, 2021).

4.1.3 Migration-specific policy and planned relocation in practice

There is no specific instrument on domestic climate migration. International labour migration is regulated by the Overseas Employment and Migrants Act 2013, which does not include a climate clause, and maintains a distinction between migration (as external and waged) and displacement (as internal and disaster-driven). Planned relocation is happening through Ashrayan and Guchhagram, where about 555,600 families had been rehabilitated in khas land between 1997 and mid-2023 (Dutta, 2023), including a climate-displaced component at Khurushkul, the first 600 of which were occupied in July 2020.

That part is now destabilized in a manner that is relevant to any recommendation to have the relocation undertaken by the state. The interim government in 2025 completely scrapped the Khurushkul beneficiary list, which was described in a notification by the Chief Adviser's Office as “flawed, questionable and biased” (The Daily Star, 2025). Thus, the eligibility determination of a flagship climate relocation component was annulled after construction.

4.1.4 Policy coherence and fragmentation

Together, these instruments (Table 3) do not so much contradict each other as talk past each other: they are coherent in their respective areas, and no instrument is responsible for another sector. Behind the fragmentation is a definitional split, where adaptation and migration are mutually exclusive, and adaptation is defined as movement avoided (Vinke et al., 2020)?

Table 3. Policy Mapping Matrix: Coverage of Climate-Induced Migration in Bangladesh’s Policy Architecture

Instrument (Year)	Lead Agency	Migration Framing and Illustrative Textual Evidence	Key Gap
Bangladesh Climate Change Strategy and Action Plan (BCCSAP), 2009	Ministry of Environment and Forests (MoEF, now MoEFCC)	Preventive framing: Migration is presented as a potential consequence of climate change. Identifies a conditional worst-case scenario of 6–8 million displaced people by 2050 and calls for monitoring migration and supporting resettlement of displaced households.	No implementing agency, budget line, or operational procedure; instrument is now dated.
Climate Change Trust Act, 2010	Ministry of Environment, Forest and Climate Change (MoEFCC)	Silent on migration: Establishes the Climate Change Trust and its funding mechanism, but no mobility-related purpose or intervention is specified.	No mobility window; expenditure cannot be traced to reception, relocation, or migrant support.
Disaster Management Act, 2012	Ministry of Disaster Management and Relief (MoDMR)	Disaster-response framing: Focuses on preparedness, emergency response, evacuation, and relief mechanisms. Migration is not explicitly recognized.	Permanent displacement and long-term settlement remain outside the operational remit.
Overseas Employment and Migrants Act, 2013	Ministry of Expatriates’ Welfare and Overseas Employment (MoEWOE)	Labour migration framing: Addresses international migration, recruitment processes, worker welfare, and overseas migrants’ rights.	Climate dimensions excluded; internal climate mobility remains outside scope.
Bangladesh Delta Plan 2100, 2018	General Economics Division (GED), Planning Commission	Migration-as-failure framing: Treats excessive migration as an undesirable outcome. Sets reduction targets, including reducing urban migration by approximately 60% (GED, 2018).	No reception mechanism, eligibility criteria, or responsible agency for displaced populations.
Standing Orders on Disaster (SOD), 2019	Ministry of Disaster Management and Relief (MoDMR)	Temporary displacement framing: Emphasizes evacuation, early warning, shelter, and relief with an underlying assumption of return after disaster events.	No provisions for long-term settlement, relocation, or reception planning.
National Strategy on Internal Displacement Management (NSIDM), 2021 (drafted 2015)	Ministry of Disaster Management and Relief (MoDMR)	Rights-based framing: Recognizes mobility as an adaptive practice. Establishes “a comprehensive and realistic rights-based framework that respects, protects and ensures the rights” of internally displaced persons (MoDMR, 2021b).	Action plan remains unfunded; formulation was largely top-down; implementation remains limited.
National Adaptation Plan (NAP) 2023–2050, 2022	Ministry of Environment, Forest and Climate Change (MoEFCC)	Urban resilience framing: Recognizes climate migrants within urban adaptation planning. Goal 3 focuses on developing climate-smart cities for improved urban environment and well-being (MoEFCC, 2022).	Migration is not identified as a standalone adaptation strategy; financing remains uncertain.
Nationally Determined Contribution (NDC 3.0), 2025	Ministry of Environment, Forest and Climate Change (MoEFCC)	Impact recognition framing: Identifies displacement as a climate impact rather than a policy intervention area: “crop loss, damage to infrastructure, and displacement, continue to present major obstacles” (Government of Bangladesh, 2025).	No dedicated climate mobility or planned relocation measure among the 65 adaptation interventions.

Note. Compiled by the authors from the instruments cited, ordered by year of adoption. Quotations are verbatim. BCCSAP = Bangladesh Climate Change Strategy and Action Plan; GED = General Economics Division; MoDMR = Ministry of Disaster Management and Relief; MoEF = Ministry of Environment and Forests; MoEFCC = Ministry of Environment, Forest and Climate Change; MoEWOE = Ministry of Expatriates’ Welfare and Overseas Employment; NAP = National Adaptation Plan; NDC = Nationally Determined Contribution; NSIDM = National Strategy on Internal Displacement Management.

4.2 Theme 2: Institutional Mechanisms and Governance Architecture (RQ2)

4.2.1 National landscape and coordination mechanisms

Six ministries have parts of a mandate that do not have a migration mandate: MoEFCC has a climate policy mandate but it does not have a mandate for migration; MoDMR and Department of Disaster Management has a displacement strategy mandate, but not a mandate for migration; the Ministry of Land has a khas land mandate, but no mandate for migration; the Housing and Public Works has an urban planning mandate but no mandate for migration; the Local Government Division has a mandate for municipal and union governance but not for migration; and the Ministry of Expatriates' Welfare and Overseas Employment has an overseas employment mandate but not a mandate for migration. Coordination platforms are in place, but none has an integrating mandate in the field of mobility (Naser et al., 2019). This architecture is mapped in Figure 4, and four consequential gaps are identified.

4.2.2 Sub-national and local governance

The frontline of reception, Union and Upazila Parishads do not have a legal mandate for in-migration and lack the

financial means to have one, while the major city corporations have no reception policy. The exception is Mongla, a fast-growing coastal town that is implementing a climate-resilient, migrant-friendly model that is now being rolled out to other coastal towns as part of a programme by the Asian Development Bank (ADB, n.d.). Its growth has been spread over incompatible geographic units, as 39,387 is for Mongla Paurashava in 2011 and 158,470 is for Mongla Upazila in 2022, and on a like-for-like basis the population of Mongla Paurashava increased from 39,387 in 2011 to 2022 (BBS, 2022).

4.2.3 The role of international organizations

IOM provides displacement tracking support and support for the Global Compact (IOM, 2025), UNDP conducts adaptation planning, the World Bank provides the key projection evidence and urban-resilience finance, and ADB and GIZ provide coastal programming. Capability thus builds up in projects, not institutions, and reception is provided as programme output, not as a right.

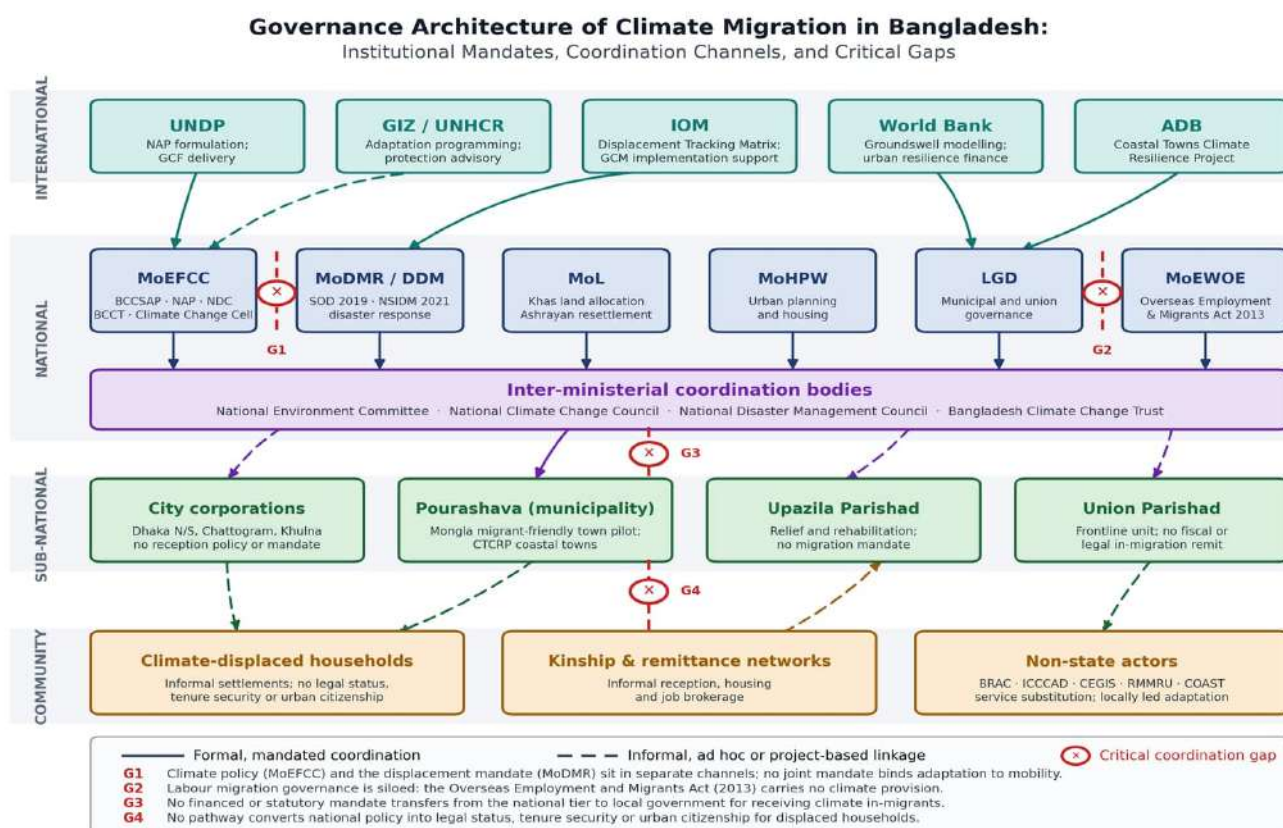


Figure 4: Governance Architecture: Institutional Mandates, Coordination Channels and Critical Gaps

Note. Solid lines denote formal, mandated coordination; dashed lines denote informal, ad hoc or project-based linkage; circled markers G1–G4 denote coordination gaps where the absence of a link is consequential. BCCT = Bangladesh Climate Change Trust; CTCRP = Coastal Towns Climate Resilience Project; DDM = Department of Disaster Management; GCF = Green Climate Fund; GCM = Global Compact for Safe, Orderly and Regular Migration; LGD = Local Government Division; MoHPW = Ministry of Housing and Public Works; MoL = Ministry of Land; SOD = Standing Orders on Disaster. Source: authors' construction.

4.3 Theme 3: Adaptation Challenges Constraining Governance (RQ3)

4.3.1 Financing

There is no financing window that is oriented towards mobility in the corpus. Since FY2009–10, the Bangladesh Climate Change Trust Fund has allocated funds for projects on a decreasing trend, and none of the funds have been allocated for migration or reception. The delivery is the binding constraint on external finance of the funds approved by the Green Climate Fund (GCF) for Bangladesh: “Only 13.3 per cent of the approved funds have been disbursed” (Transparency International Bangladesh [TIB], 2024; see also Green Climate Fund [GCF], 2026). But the underfunding is not just quantitative: no window is specifically dedicated to mobility, and migration programming has no window through which it could be underfunded, as the National Adaptation Plan (NAP) has set a target of USD 230 billion for least developed countries (LDCs) (Climate Policy Initiative, 2023).

4.3.2 Urban governance and reception capacity

Dhaka is the city that receives the highest number of migrants to informal settlements with insecure tenure and the risk of eviction, and with partial access to services, with secondary cities being under-prepared (Rana & Ilina, 2021; Huq & Shafique, 2023). The evidence base is not to be trusted: the notion of 2,000 people arriving in Dhaka daily is an advocacy estimate, not one produced by any administrative system; and the estimates of the number of slum dwellers in the capital vary from about 3.5 to 6 million, depending on what is meant

by ‘slum’. That is an uncertainty in itself, as reception planning is based on figures that the state does not produce.

4.3.3 Gender, equity and vulnerability

There is an unequal distribution of exposure. A purposive survey of 648 households in two districts (Mathbaria (Pirojpur) and Gowainghat (Sylhet)) that are more climate vulnerable was carried out and found that 92 percent of the households were exposed to at least one form of modern slavery, with more than half exposed to three or more forms (Bharadwaj et al., 2025); this figure represents exposure in climate-affected districts and is not nationally representative. Women migrants work in garment factories and do domestic labour; women who stay bear the increased burden of care (Khanom et al., 2022), and there is no gender differentiated mobility provision in the corpus.

4.3.4 Livelihoods and legal protection

At origin, the dismantling of livelihoods by salinity intrusion and the conversion of agriculture to aquaculture, and at destination, the absorption of arrivals into saturated informal labor markets that do not match agricultural skills, compromise livelihoods (Khatun et al., 2022; Rahman et al., 2022). Access to social protection entitlements is not portable and is based on place of origin; thus, movement cuts off access to the schemes that are supposed to buffer it. There is no legal status given to a climate-displaced person in Bangladeshi law, and the Guiding Principles on Internal Displacement (Deng, 1998) have not been domesticated, which means that tenure is insecure and there are barriers to access to services (Naser et al., 2019). The severity of these constraints is scored in Table 4.

Table 4. Adaptation Challenges Matrix: Issues, Governance Implications and Scored Gap Severity

Challenge Domain	Key Issues and Current Response	Governance Implication	Severity (M / L / A)
Financing	Issues: Declining trust-fund allocation; absence of a mobility financing window; low disbursement ratio; fragmented external funding streams. Current response: BCCTF and GCF adaptation and livelihood projects.	Migration programming lacks an institutional funding channel through which planned mobility, relocation, or reception measures can be financed.	Critical (2 / 2 / 2 = 6)
Urban governance	Issues: Unplanned absorption; tenure insecurity; exclusion from urban services; unreliable arrival data. Current response: Mainly ad hoc and project-based initiatives, including the Mongla pilot.	Urban reception planning occurs without a reliable evidence base for estimating arrivals, service needs, and settlement requirements.	Critical (2 / 2 / 2 = 6)
Legal protection	Issues: No legal status for climate-displaced persons; insecure tenure; documentation barriers. Current response: Absent.	Climate migrants lack a rights-based claim on the state and remain outside formal protection frameworks.	Critical (2 / 2 / 2 = 6)

Gender and equity	Issues: Exploitation risks in transit and at destination; intensified burdens for those who stay. Current response: Minimal gender mainstreaming.	Differentiated needs remain systemically unaddressed.	Severe (2 / 2 / 1 = 5)
Livelihoods	Issues: Origin livelihood collapse; skills mismatch; social protection not portable. Current response: Scattered NGO programming.	Movement can sever access to schemes intended to cushion vulnerability.	Severe (2 / 1 / 2 = 5)

Note. Three criteria are each scored 0–2 and summed: M = mandate (2 = no agency holds the competence; 1 = competence held but unimplemented; 0 = competence held and operational); L = leverage (2 = no financed or statutory instrument exists; 1 = instrument exists but unfunded or partial; 0 = instrument financed and operating); A = evidence availability (2 = no administrative system generates the relevant measure; 1 = partial or non-state data only; 0 = routine official measurement). Totals of 6 are labelled Critical and 4–5 Severe. The rubric orders priority; it does not measure magnitude. Domains are ordered by score. BCCTF = Bangladesh Climate Change Trust Fund; GCF = Green Climate Fund; NGO = non-governmental organization. Source: authors' construction.

4.4 Theme 4: The International–Domestic Interface (RQ4)

4.4.1 Adoption of international frameworks

Bangladesh is an active member of the global governance of mobility, having signed the Global Compact (United Nations, 2018), being a member of the Platform on Disaster Displacement and the UNFCCC Task Force on Displacement, and having twice chaired the Climate Vulnerable Forum. Domestic translation continued to progress in 2026, with a National Action Plan (2026–2030) being implemented to implement the Global Compact, which was co-led by the Ministry of Foreign Affairs and the Ministry of Expatriates' Welfare and Overseas Employment (Government of Bangladesh, 2026). It is organized around overseas labour migration and falls in the foreign affairs and labour track, instead of being connected to the displacement strategy held by MoDMR: the most developed migration action plan and only displacement strategy in the country are housed in different ministries and address different populations.

4.4.2 Evidentiary dependence and misalignment

The problem is defined to a large extent outside of the system. Boas et al. (2019) and Sim-Sarka (2025) refer to the epistemological critique in the practical implementation of

the response, as projection figures are based on the World Bank modelling (Rigaud et al., 2018; Clement et al., 2021) and operational data from IOM systems (IOM, 2025), meaning that the evidence base that underpins national planning is generated by organizations that also finance the response. The following three misalignments exist: global instruments are designed for cross-border mobility, but Bangladesh's mobility is overwhelmingly internal (Kälin, 2018); external prescriptions are in conflict with a contested political economy of land and urban governance; and the state's climate-victim and adaptation-leader narratives have conflicting evidentiary needs (Vanhala & Calliari, 2022).

5. DISCUSSION

5.1 Synthesis: A Governance Deficit, Not Four Problems

The four themes are representations of a state of affairs. The barriers listed under Theme 3 unearmarked finance, no legal status, unprepared receiving cities, gendered exposure, and non-portable entitlement are all those that a unified mandate would face, and the fact that they are present in Bangladesh is diagnostic. The deficit is a structural issue of the architecture: each instrument is coherent within its sector, and sectoral coherence is what forecloses responsibility across sectors (Figure 5).

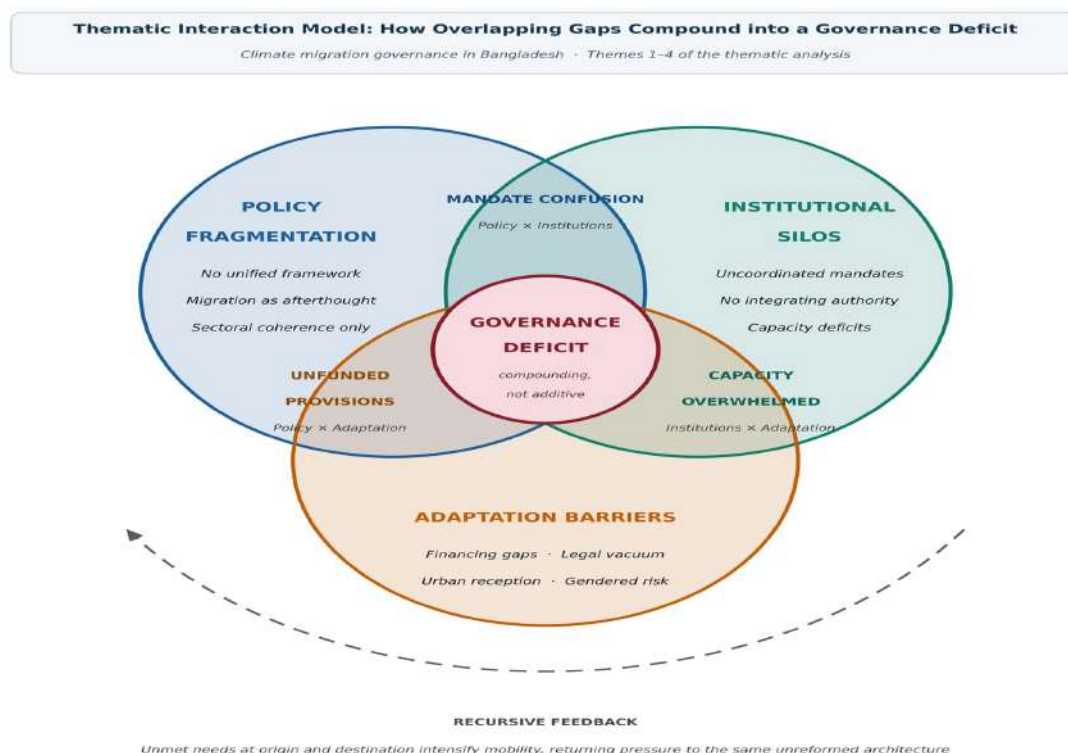


Figure 5: Thematic Interaction Model: How Overlapping Gaps Produce a Governance Deficit

Note. Pairwise intersections denote the specific dysfunction generated where two gaps meet; the central intersection denotes the compounding rather than merely additive governance deficit produced where all three coincide. The dashed arc represents the recursive loop through which ungoverned outcomes return as intensified pressure on the same unreformed architecture. Source: authors' construction.

5.2 Theoretical Contribution: The Mandate Vacuum

Multi-level governance is based on the premise that there is an allocation of powers among nested levels of government with complementary competencies. Bangladesh makes the assumption that there is a prior condition: distribution implies that there is some competence to be distributed. Climate migration is a reality at the level of Union and Upazila Parishads and the city corporations, but they do not have a legal mandate on in-migration or a fiscal tool. The case does not reveal an overlap between the cases of mandate, but rather a vacuum of mandate, as the local level is not a weaker actor in the mobility policy network but a non-participant, as in Di Gregorio et al. (2019).

That assertion will have to be put to the test against the closest existing study. Decision power is centralized at the national level, and there is apparent pluralism, but also domination by a small number of actors, as demonstrated by Ishtiaque et al. (2021) in their network analysis of coastal adaptation actors. Their finding and the present finding are complementary but not equivalent, and the difference lies in the contribution: they find that the local tier is marginal in an adaptation network in which it is part; this study finds that, for climate mobility, there is no network to be marginal. The problem of marginality is a distributional one which can be solved by

devolution, while the problem of vacuum is constitutive, which means that a competence has to be created first.

This is fine-grained by the Hooghe and Marks (2003) typology. Bangladesh's climate architecture is a well-developed Type I system of non-overlapping, general-purpose ministerial jurisdictions, in durable tiers. That is exactly what Type II jurisdictions are for the task-specific problem of climate mobility, which is not under the control of any one jurisdiction, but rather is a problem of cross-sectoral, cross-border, cross-jurisdictional mobility, and no Type II jurisdiction has been created for it. Polycentricity requires decision centres to have authority over the problem; otherwise, it is a waste of money to create more centres, and the problem persists.

The second donation is related to the framing of migration as adaptation. It moves the responsibility from the societal systems to the households, and the corpus demonstrates how: while for Vinke et al. (2020) the Delta Plan is a failure, the state fulfills its responsibility by limiting mobility instead of regulating it. The immobility literature reveals the dichotomy is false in both directions: immobility can be adaptive (Khatun et al., 2022); and not being able to move is a specific deprivation (Ayeb-Karlsson et al., 2020).

5.3 Comparative Context: Case Selection and Dimensions

The comparator cases are chosen based on an explicit logic. The design is most-different: Tuvalu, the Philippines, and Mozambique have different levels of state capacity, different hazard profiles, and different types of mobility, but they have all faced the challenge that Bangladesh has not: the destination-side challenge. All are evaluated in four dimensions: whether there is a mobility or relocation instrument in place; the tier where the reception competence is located; if relocation decisions are based on consent; and if livelihood restoration is planned in parallel with shelter.

On the first, small island developing states have developed the most specific instruments: Tuvalu has developed instruments on loss and damage, including the mobility component, as a domestic policy object, not just an international claim (Calliari & Vanhala, 2022), and Fiji has codified consent, eligibility and site-selection criteria for state-supported movement (Republic of Fiji, 2018). On the second and fourth, the Philippines has a mature disaster-risk law, but its relocation practice does not necessarily consider access to work when selecting sites, and livelihoods are often disrupted. In Mozambique, the decisions to move people in the third dimension were not made with the affected people, resulting in the absence of a durable solution to the resettlement of those affected by Cyclone Idai (Jacobs & Almeida, 2021; Sunu, 2025). Bangladesh is doing badly on the first dimension, and is in an indeterminate state on the second dimension and, on the basis of the annulled Khurushkul list, weak on the third dimension.

5.4 The Urban Blind Spot, Power and Representation

Policy attention is geographically oriented, following the geography of departure. Coastal and riverine districts are the targets of adaptation investment, and cities that receive the migrants control reception de facto. This receiving-end neglect is the missing element in the Bangladeshi literature, as is reflected in secondary cities: climate migrants in Rajshahi took up insecure informal jobs, not registered in any municipality (Rahman et al., 2022). There is no statutory duty for any tier of local government to receive them, and the record suggests that the destination is not under-governed, but by design: evidence of this is not available in this study. In what ways the problem is told is a governance issue. Projections are made outside of the planning process at the national level (Rigaud et al., 2018; Clement et al., 2021), and the actors funding the response also determine what is being responded to. Predictive climate-mobility knowledge, Sim-Sarka (2025) suggests, continues the state-centric framings that are oriented towards control instead of protection. This manifests in Bangladesh as a discourse of victimhood – migrants are counted, projected and planned for, and rarely consulted. The counter-evidence is that almost all internal

migrants in two climate-affected districts are exposed to modern slavery; when agency is exercised without protection, it is exposure, not empowerment (Bharadwaj et al., 2025).

6. POLICY RECOMMENDATIONS

It is not an administrative deficit; it is a structural deficit, and remedies have to be sequenced. The six reform areas are derived from the four themes, and are summarized in Table 5 (actors, timeframes, priority and indicators) and mapped out in Figure 6 (sequencing).

6.1 A National Climate Migration Governance Framework

What is needed is an implemented strategy, not a new one, for Bangladesh. The National Strategy on Internal Displacement Management and its action plan (2022-2042) are already in place and are a rights-based instrument, but lack a costed budget line, a statutory basis, and an accountable owner (MoDMR, 2021b, 2022). The challenge is to fund and scale up that instrument and then integrate mobility into the frameworks that drive investment: introducing mobility as an adaptation option in National Adaptation Plan implementation (MoEFCC, 2022); introducing mobility indicators in the Third NDC adaptation component (Government of Bangladesh, 2025); aligning the displacement strategy with the Global Compact National Action Plan 2026–2030 (Government of Bangladesh, 2026); and shifting the Delta Plan's target of migration reduction to a target of reception (GED, 2018). MoDMR is the natural sponsor; the Planning Commission is the likely source of opposition, as it is the one that will lose the Delta Plan's headline targets.

6.2 Institutional Reform and the Construction of a Competence

The competence has to be built, as no ministry has the entire responsibility for it. There should be a National Taskforce on Climate Mobility on a permanent basis with a clearly defined mandate, reporting obligations, and a permanent secretariat, comprising the six ministries, civil society and migrant representatives. Coordination alone can run the risk of replicating the problem that it is trying to solve, as adaptation decision-making is centralized at the national level and is influenced by elite pluralism (Ishtiaque et al., 2021). Thus, Union and Upazila Parishads, pourashavas and city corporations must be given a statutory mandate for in-migration and an untied fiscal transfer to enable them to perform this mandate.

The transfer should have a transparent size. With a mobility window of one per cent of the climate-relevant budget allocation, Bangladesh would get around Tk 305 crore (or USD 25 million) per year, based on the National Adaptation Plan's estimated allocation of Tk 30,532 crore for FY2023-24. Across the 4,579 unions and 329 municipalities listed in IOM's 2025 baseline (IOM, 2025), it is a relatively small

amount per union, and that's the idea: a window of this magnitude is small in monetary terms but big in institutional terms, as it establishes the budget line through which reception expenditure is possible and traceable. Line ministries will not like an untied transfer and therefore, a small window, time-bound and performance-linked transfer becomes more likely.

6.3 Urban Governance and Reception Planning

Reception should not be defaulted to, but rather planned. City corporations and pourashavas for the destination cities should have land use plans, service and shelter plans based on published projections and be funded to implement them. Three are particularly relevant: security of tenure and freedom from arbitrary eviction (Huq & Shafique, 2023); portability of social protection across administrative boundaries; and municipal registration of arrivals, as a way to overcome statistical invisibility of post-displacement populations (Rahman et al., 2022). Secondary-town programming is a viable diversion approach, but should be scaled based on a proven service capacity (Rana & Ilina, 2021). Registration makes an informal population a costed entitlement, making the transfer of coverage on registration the alignment of municipal incentives.

6.4 Financing and Resource Mobilization

There is no existing window that is geared towards mobility, and therefore the funding of reception and relocation is not possible even in principle. Such spending would be possible and traceable if there were a dedicated stream within the Bangladesh Climate Change Trust Fund, which has published criteria for allocating the funding to climate change, and a mobility marker in climate budget tagging. The mandate vacuum is reflected in the fact that there is no mobility marker available so far, and therefore, climate expenditure on reception cannot be identified even if it does exist. The assessments reveal that access to the GCF is limited and that disclosure in national climate funds is weak, a precondition for scale.

The loss and damage recommendation is specific and time-bound. In April 2025, the Fund for responding to Loss and Damage (FRLD) developed the Barbados Implementation Modalities, a pilot of USD 250 million for the period of 2025-2026, with a request of USD 5-20 million and at least 50% of

the funding set aside for small island developing states and least developed countries (FRLD, 2025a). The first call opened at COP30 on 10 November 2025 and runs to 15 June 2026 (FRLD, 2025b). Given this timeframe, Bangladesh should make a mobility-based claim within this timeframe, which has been agreed by the Fund based on the agreed definition.

6.5 Rights-Based Approach and Legal Protection

Naser et al. (2019) state that recognition without status does not give the migrants any legal or enforceable rights to the state. Domesticating the Guiding Principles on Internal Displacement (Deng, 1998) would help to prevent arbitrary internal displacement, ensure the transfer of identity documents and voter registration, and provide security of tenure on khas land provided through resettlement; the Action Agenda on Internal Displacement (United Nations, 2022) provides a development-led template with ministerial accountability. Khurushkul outlines the protections that must be included: a list of eligibility criteria published in 2011 and revoked in 2025 as flawed and biased (The Daily Star, 2025) indicates that entitlement to relocation programmes must be revocable by administrative decision, but should also have published criteria, an appeals mechanism and periodic revalidation. Legal status is the most distributive and least bureaucratic and therefore is placed last.

6.6 Gender-Responsive Migration Governance

Design is not gender neutral, but rather gender responsive and is considered a separate reform as it is cross-cutting and not subordinate. Women migrants are more insecure when they migrate alone, and women non-migrants are more insecure when they stay at home, taking on greater care responsibilities (Khanom et al., 2022; Kabir & Kamruzzaman, 2022); and planning that does not consider the gendered use of space reinforces exclusion (Jabeen, 2019). There are three provisions following: sex-disaggregated reporting in any municipal registration introduced under Section 6.3; gender-differentiated eligibility and safeguarding criteria in relocation programmes (Bharadwaj et al., 2025); and representation of women migrants and non-migrants on the task force proposed under Section 6.2.

Table 5: Policy Recommendations: Responsible Actors, Timeframes, Priority and Indicators

#	Recommendation and Lead Actors	Timeframe	Priority	Indicators and Baseline (2026 unless stated)
R1	National climate migration governance framework Lead actors: MoEFCC, MoDMR, Cabinet Division	Medium (2–4 years)	High	(i) NSIDM action plan financed through a dedicated budget line (baseline: none); (ii) Mobility indicators reported in the NDC adaptation component (baseline 2025: 0 of 65 interventions)
R2	Coordination mechanism and local competence	Short (1–2 years)	Critical	(i) Taskforce constituted with secretariat and published reporting cycle (baseline: none);

	Lead actors: Cabinet Division, GED, LGD			(ii) Statutory in-migration remit conferred on pourashavas and city corporations (baseline: none)
R3	Climate-sensitive urban reception planning Lead actors: LGD, city corporations, MoHPW	Medium (2–5 years)	High	(i) Number of destination municipalities with approved reception plans (baseline: 0); (ii) Share of arrivals recorded in municipal registers (baseline: not measured)
R4	Dedicated migration financing stream Lead actors: MoF, BCCT, GCF, FRLD	Medium (2–4 years)	High	(i) Mobility marker operational in climate budget tagging (baseline: absent); (ii) At least one mobility-focused FRLD request submitted by 15 June 2026 (baseline: none)
R5	Legal protection framework for climate-displaced persons Lead actors: MoLaw, MoDMR, MoL	Long (3–5 years)	High	(i) Guiding Principles domesticated in statute (baseline: not domesticated); (ii) Documentation and voter-registration portability operational at destination (baseline: absent)
R6	Gender-responsive migration governance Lead actors: MoWCA, MoEFCC, MoDMR	Short to medium (Cross-cutting)	Moderate	(i) Sex-disaggregated reporting in municipal registration (baseline: not collected); (ii) Women migrants and non-migrants represented on the R2 taskforce (baseline: no taskforce)

Note. Priority denotes the authors' comparative ordering of urgency derived from the coded corpus and the severity rubric at Table 4; it is not a scored measurement of magnitude. Timeframes are indicative horizons from adoption. Baselines state the position at the time of writing and are to be re-verified at submission. BCCT = Bangladesh Climate Change Trust; FRLD = Fund for responding to Loss and Damage; GCF = Green Climate Fund; GED = General Economics Division; LGD = Local Government Division; MoDMR = Ministry of Disaster Management and Relief; MoEFCC = Ministry of Environment, Forest and Climate Change; MoF = Ministry of Finance; MoHPW = Ministry of Housing and Public Works; MoL = Ministry of Land; MoLaw = Ministry of Law, Justice and Parliamentary Affairs; MoWCA = Ministry of Women and Children Affairs; NSIDM = National Strategy on Internal Displacement Management.

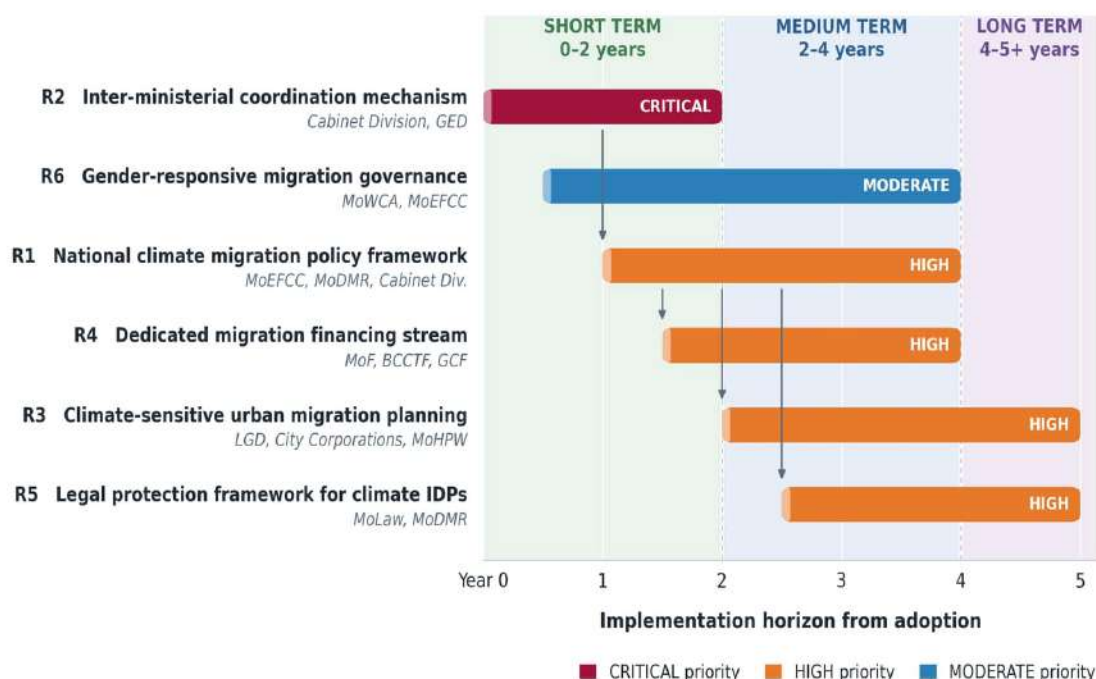


Figure 6: Sequenced Implementation Roadmap for Climate Migration Governance Reform in Bangladesh

Note. Bars denote indicative delivery windows for the six recommendations in Table 5, colour-coded by priority. Vertical arrows denote enabling dependencies: the coordination mechanism (R2) enables the national policy framework (R1), which in turn enables the financing stream (R4), urban reception planning (R3), and the legal protection framework (R5). Gender-responsive governance (R6) is cross-cutting and begins early. Source: authors' construction.

7. CONCLUSION

7.1 Synthesis and Contribution to Knowledge

The questions in this study were: How is mobility recognized in the language of policy in Bangladesh? How is mobility left largely ungoverned in practice in Bangladesh? How is the governance of mobility shaped by the changing climate in Bangladesh? How is the changing climate shaped by the governance of mobility in Bangladesh? The answer to all four questions is the same: mobility is recognized in the language of policy and left largely ungoverned in practice in Bangladesh. What the analysis does add is a description of why there is no recognition of capacity. Recognition is spread out and can be given through sectoral instruments, which can recognize mobility without taking responsibility for it, while capacity has to be owned by one responsible person at the level at which mobility ends up. The architecture provides recognition at low cost and no capacity; the latest instruments continue the trend.

The paper moves the focus of analysis away from the factors shaping climate mobility to the governance structures that shape the effects of climate mobility. The case deconstructs multi-level governance theory in the sense that it does not identify competing mandates between levels of government but a mandate vacuum at the level where mobility becomes a reality. The framework is provided as a possibly transferable diagnostic, but is not proven to be so in Section 5.3.

7.2 Limitations and Future Research

Documentary designs should clearly specify the boundaries of the evidence, and not leave them to the imagination. This study can determine the instruments' statements, omissions, and the agencies identified and not identified. It is not able to determine intent, and cannot say if fragmentation would have stood up to a more diligent bureaucracy, or if it was intentional in the first place. The analysis provides weaker and sufficient support for the weaker and sufficient claim that fragmentation is reinforced by the characteristics of the architecture, as each of the three elements of sectoral budgets, sectoral accountability, and a sectorally generated evidence base can be argued to discourage cross-sectoral ownership. Further boundaries apply. The analysis is based on published documents, mostly in English, and as such is limited by the absence of unpublished deliberation and Bangla-language commentary, and the lack of primary stakeholders' voices. The field also shifted during the study, as the change of government in August 2024 was a governance rupture, with the Khurushkul annulment as one of the consequences that are still unfolding. The four directions are as follows: Primary research with policymakers, local officials and migrants; quantitative assessment of climate finance flows; comparative analysis across South Asian countries with shared basins; and longitudinal tracking of recognition in text to capacity in institutions.

7.3 Normative Coda

This deficit reported here does not have to be. However, Bangladesh already has the instrument it needs in its internal displacement strategy; it is a question of decision, not capacity, as the country needs finance, a statutory basis and an accountable owner. Movement across this delta is a loss borne locally for emissions generated elsewhere and, as argued here, the minimum content of climate justice is governing this movement through rights, consent and planned reception instead of reduction targets.

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Appendix A. The Analytical Corpus

The analytical corpus comprises N = 71 documents that were coded against the frame reported in Table 3 and Appendix C. Categories 1, 2, 3 and 5 are enumerated below with issuing body, year and document type; category 4 comprises the 31 substantive peer-reviewed articles on Bangladeshi climate mobility and its governance listed in the References. Fifteen further works methodological (Bowen; Braun and Clarke ×4; Dalglish et al.; Gale et al.; Hsieh and Shannon; Nowell et al.; O'Brien et al.; Poth; Roberts et al.; Stahl and King) and theoretical (Hooghe and Marks; Ostrom; Jordan et al.) are cited to justify the design and framing and were not coded. URLs and access dates are recorded in the project file and are to be inserted in the final column before submission.

Table A1

Category 1 — National Policy, Strategy and Plan Documents (n = 12)

#	Document	Issuing body	Year	Type
1	Bangladesh Climate Change Strategy and Action Plan	Ministry of Environment and Forests	2009	Strategy
2	Bangladesh Delta Plan 2100	General Economics Division, Planning Commission	2018	Plan
3	Standing Orders on Disaster	Ministry of Disaster Management and Relief	2019	Operational order
4	National Plan for Disaster Management 2021–2025	Ministry of Disaster Management and Relief	2021	Plan
5	Nationally Determined Contribution (updated)	Ministry of Environment, Forest and Climate Change	2021	International commitment
6	National Strategy on the Management of Disaster and Climate-Induced Internal Displacement (draft)	Ministry of Disaster Management and Relief	2015	Draft strategy
7	National Strategy on Internal Displacement Management (adopted)	Ministry of Disaster Management and Relief	2021	Strategy
8	National Action Plan (2022–2042) on Internal Displacement	Ministry of Disaster Management and Relief	2022	Action plan
9	National Adaptation Plan of Bangladesh (2023–2050)	Ministry of Environment, Forest and Climate Change	2022	Plan

#	Document	Issuing body	Year	Type
10	Third Nationally Determined Contribution (NDC 3.0)	Government of Bangladesh / MoEFCC	2025	International commitment
11	National Action Plan (2026–2030) for the Global Compact for Migration	Ministry of Foreign Affairs; MoEWOE	2026	Action plan
12	Ashrayan programme documentation, including the Khurushkul component	Prime Minister's Office, Ashrayan Project	2020–2025	Programme record

Table A2

Category 2 — Legislative Texts (n = 5)

#	Statute	Enacting body	Year
13	Climate Change Trust Act	Parliament of Bangladesh	2010
14	Disaster Management Act	Parliament of Bangladesh	2012
15	Overseas Employment and Migrants Act	Parliament of Bangladesh	2013
16	Local Government (Union Parishad) Act	Parliament of Bangladesh	2009
17	Local Government (City Corporation) Act	Parliament of Bangladesh	2009

Table A3

Category 3 — International Organisation and Comparative Government Documents (n = 18)

#	Document	Issuing body	Year
18	Guiding Principles on Internal Displacement	UN Commission on Human Rights	1998
19	Agenda for the Protection of Cross-Border Displaced Persons	Nansen Initiative	2015
20	Groundswell: Preparing for Internal Climate Migration	World Bank	2018
21	Global Compact for Safe, Orderly and Regular Migration	UN General Assembly	2018
22	Planned Relocation Guidelines	Republic of Fiji, Ministry of Economy	2018
23	Global Climate Risk Index 2021	Germanwatch	2021
24	Groundswell Part 2: Acting on Internal Climate Migration	World Bank	2021
25	Climate Change 2022: Impacts, Adaptation and Vulnerability (AR6 WGII)	IPCC	2022
26	Action Agenda on Internal Displacement	United Nations	2022
27	Global Landscape of Climate Finance 2023	Climate Policy Initiative	2023
28	Coastal Towns Climate Resilience Project documentation	Asian Development Bank	n.d.
29	Global Report on Internal Displacement 2025	IDMC	2025
30	Climate Risk Index 2025	Germanwatch	2025
31	Barbados Implementation Modalities (Decision B.5/D.4)	Fund for responding to Loss and Damage	2025
32	Call for funding requests at COP30	Fund for responding to Loss and Damage	2025

#	Document	Issuing body	Year
33	Nationwide estimate of disaster-induced internal displacement (DTM baseline)	IOM Bangladesh	2025
34	Climate Risk Index 2026	Germanwatch	2026
35	GCF portfolio dashboard	Green Climate Fund	2026

Table A4

Category 5 — NGO, Civil Society and Press-of-Record Sources (n = 5)

#	Document	Issuing body	Year
36	Ashrayan fosters inclusive development to help achieve SDGs	Bangladesh Sangbad Sangstha	2023
37	Accessing Green Climate Fund for vulnerable countries like Bangladesh	Transparency International Bangladesh	2024
38	Exposed and Exploited: Climate Change, Migration and Modern Slavery in Bangladesh	IIED	2025
39	Governance challenges in climate finance in Bangladesh	Transparency International Bangladesh	2025
40	Climate refugee: Rehabilitation list for 4,409 in Cox's Bazar cancelled	The Daily Star	2025

Note. Category 4 (n = 31) comprises the substantive peer-reviewed articles listed in the References. Corpus total: 12 + 5 + 18 + 31 + 5 = 71.

Appendix B. Search Strategy

The search strategy is reported in full so that the corpus can be reconstructed. Hit counts and search dates are to be completed by the authors from the screening log before submission; the strings, databases, filters and portals below are the strategy as executed.

Source	Search string as executed	Filters	Date searched	Hits
Scopus	TITLE-ABS-KEY (("climate migration" OR "climate-induced displacement" OR "environmental migration" OR "climate mobility" OR "planned relocation") AND (governance OR policy OR institution* OR adaptation) AND (Bangladesh))	2018–2026; English; article or review		
Web Science	of TS = (("climate migration" OR "climate-induced displacement" OR "environmental migration" OR "climate mobility") AND (governance OR policy OR institution*) AND Bangladesh)	2018–2026; English; article or review		
Google Scholar	("climate migration" OR "climate displacement") AND (governance OR policy) AND Bangladesh — first 10 pages screened	2018–2026; English		
Government portals	Site-restricted searches of moef.portal.gov.bd, modmr.portal.gov.bd, plancomm.gov.bd, bbs.gov.bd, minlaw.gov.bd for: displacement,	2009–2026		

Source	Search string as executed	Filters	Date searched	Hits
	migration, relocation, resettlement, climate migrant			
IO and NGO repositories	Catalogue searches of World Bank OKR, IOM Publications and DTM, IDMC, UNFCCC NDC Registry, GCF, FRLD, ADB Projects, Germanwatch, CPI, IIED, TIB	2009–2026	☐	☐

Appendix C. Codebook

The codebook comprises 21 deductive sub-codes derived from the three-pillar framework and 5 codes generated inductively during coding. Each inductive code was retained where it recurred in at least four documents and was not anticipated by the deductive frame.

Code	Origin	Definition applied during coding
Policy coverage	Deductive	Whether and where an instrument addresses human mobility
Migration framing	Deductive	How mobility is characterised: failure, consequence, adaptive option, risk
Adaptation–migration nexus	Deductive	Whether movement is treated as an alternative to, or a form of, adaptation
Policy coherence	Deductive	Alignment or divergence between instruments on mobility
Gaps and silences	Deductive	Mobility-relevant matters an instrument does not address
Mandate clarity	Deductive	Whether a named agency holds a stated competence
Inter-ministerial coordination	Deductive	Formal mechanisms linking ministries on mobility
Local government capacity	Deductive	Statutory remit, staffing and technical capacity at union, upazila and municipal tiers
NGO and IO roles	Deductive	Functions performed by non-state and international actors
Fiscal instrument	Deductive	Existence of a budget line, transfer or fund through which action could be financed
Financing allocation	Deductive	Amounts committed or earmarked
Financing disbursement	Deductive	Amounts actually delivered; delivery ratios
Urban governance	Deductive	Reception planning, tenure, services and registration at destination
Gender	Deductive	Gender-differentiated exposure, provision or representation
Livelihood security	Deductive	Origin livelihood loss, skills match, labour market absorption
Legal protection	Deductive	Status, rights, documentation and remedies
Land and tenure	Deductive	Khas land, allocation and security of tenure
Framework adoption	Deductive	Endorsement of or accession to international instruments
Norm translation	Deductive	Conversion of international commitments into domestic instruments
Development conditionality	Deductive	Donor requirements shaping domestic action
Evidentiary dependence	Deductive	Origin of the data and projections used in national planning

Code	Origin	Definition applied during coding
Mobility framed as failure	Inductive	Explicit or implicit treatment of out-migration as an indicator of unsuccessful policy, including quantified reduction targets
Assumption of return	Inductive	Provisions premised on displaced people going home, with no provision for those who do not
Portability of entitlement	Inductive	Whether a benefit, registration or service follows a person who moves administrative boundary
Measurement absence	Inductive	Reliance on estimates that no administrative system produces, including advocacy figures used as planning inputs
Narrative incompatibility	Inductive	Tension between the state's climate-victim and adaptation-leader accounts as it bears on what can be documented