INTERPORT
MARITIME LTD

BEYOND THE HORIZON

NAVIGATING MARITIME CLAIMS IN BANGLADESH

Shortage Claims for Dry Bulk Cargo

16 August, 2026

Ref: LPB/DRY_BULK_CARGO_SHORTAGE/20260816

The Bangladesh Landscape:

Sea transportation plays a vital role in Bangladesh's economy, with approximately **85% of the country's import and export trade carried by sea.** Chittagong Port handles around 92% of the country's general cargo and 98% of its containerised cargo. As an import-dependent and growing economy, Bangladesh continues to receive substantial volumes of dry bulk commodities, including wheat, soya bean, corn, chickpeas, raw sugar, lentils, fertilisers, coal, scrap, cement clinker, limestone and aggregate.

Cargo quantity at Chittagong Port has continued to increase. In FY2025–26, the port handled a record **137.7 million tonnes of cargo,** representing an increase of approximately 5.4% from 130.7 million tonnes in the previous financial year. As bulk cargo import volumes and discharge operations increase, so too does the potential for cargo quantity disputes and shortage allegations.

Inflated shortage claims raised by receivers against Shipowners during or following the discharge is common in Bangladesh. In practice, the shortage quantity initially alleged by receivers or their surveyors may differ substantially from the quantities subsequently established through independent joint draft surveys carried out by the Shipowners' surveyors.

Resolving such claims can be time-sensitive and challenging from time to time, owing to local procedural and bureaucratic difficulties. In some cases, vessels may face delays in sailing where local agents **withhold port clearance until the dispute is resolved or suitable security is provided.**

This updated bulletin provides an updated overview of dry bulk cargo shortage claims in Bangladesh, incorporating **Interport's claims-handling data for 2022–2025,** together with practical guidance intended to assist Shipowners in preventing, managing and responding to such claims.

Import Landscape, 2020–2025

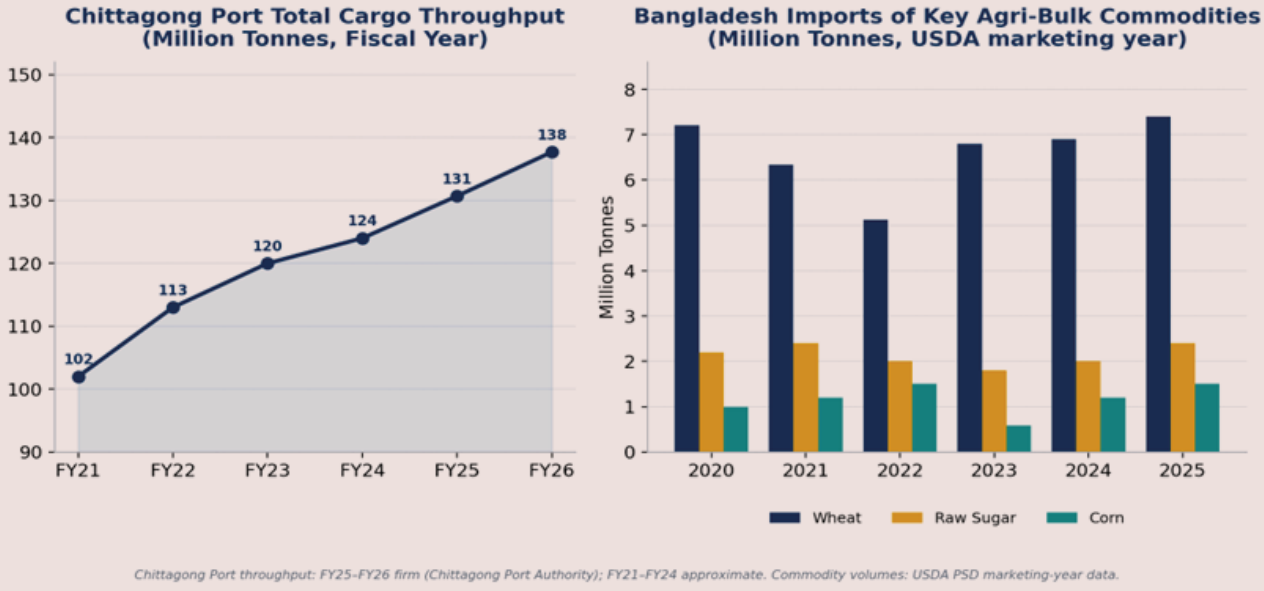

Figure 1. Left: Total cargo handled at Chittagong Port (FY25–FY26 from Chittagong Port Authority; earlier years approximate).
Right: Imports of key agri-bulk commodities in Bangladesh, USDA PSD marketing-year data.

Data-Driven Insights: Shortage Matters 2022–2025

Interport handled 54 dry-bulk shortage matters across 2022–2025, spanning 13 distinct cargo types and totalling roughly 16,690 metric tonnes of alleged shortage. The headline figures below summarise the four-year picture.

54	13	~16.7K	6,800
Vessels with claims (2022–2025)	Cargo types involved	Total alleged shortage (MT)	2025 alleged shortage (MT)

Total Shortage Quantity by Year

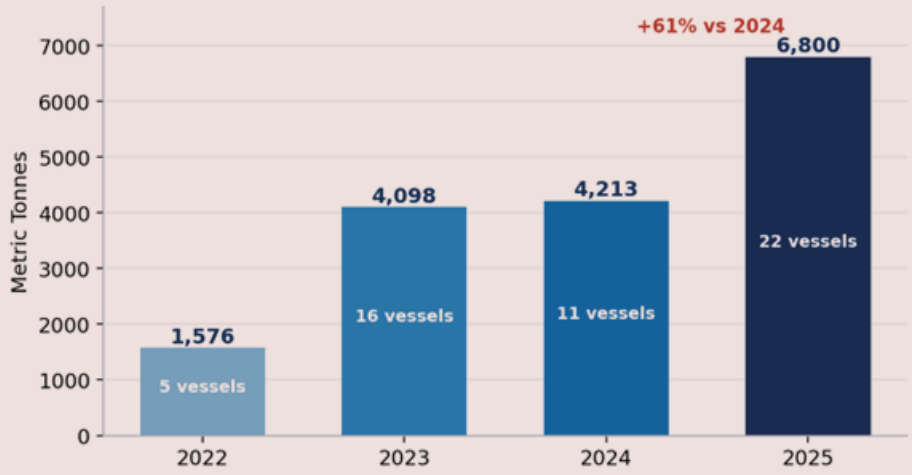

Figure 2. Total shortage quantity and number of vessels per year, 2022–2025.

The increase is clear, the total alleged shortage rose from **1,576 MT in 2022 to 6,800 MT in 2025,** representing an increase of approximately **61% compared with 2024** and more than four times the level recorded in 2022. The number of vessels involved also doubled year on year, from 11 in 2024 to 22 in 2025.

This increase may partly reflect higher import volumes and a greater number of discharge operations. However, as discussed in Section 4, the 2025 data also shows that a number of shortage allegations raised by receivers were subsequently reduced or were not supported by the findings of the Shipowners' joint draft surveys.

Distribution of Shortage Matters by Cargo Type [2022 - 2025]

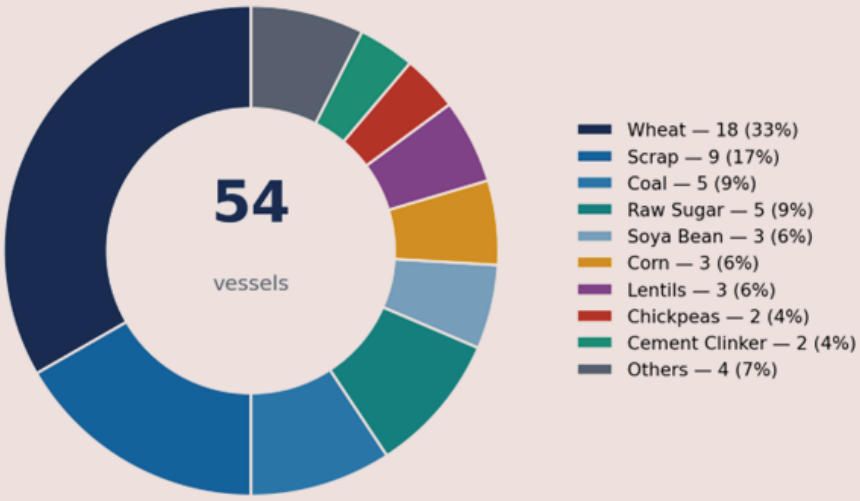

Figure 3. Share of shortage matters by cargo type (by number of vessels), 2022–2025.

By frequency, **wheat accounted for the largest share of the matters handled, with 18 of 54 cases (33%)**, followed by scrap with 9 cases (17%), and coal and raw sugar with 5 cases each. This broadly reflects the underlying import profile, with wheat representing a major agri-bulk import and scrap cargoes being particularly susceptible to quantity discrepancies during discharge and draft survey.

Together, wheat and scrap accounted for **half of all dry bulk shortage matters handled by Interport during 2022–2025.**

Total Shortage Matters by Cargo, 2022 - 2025 [MT]

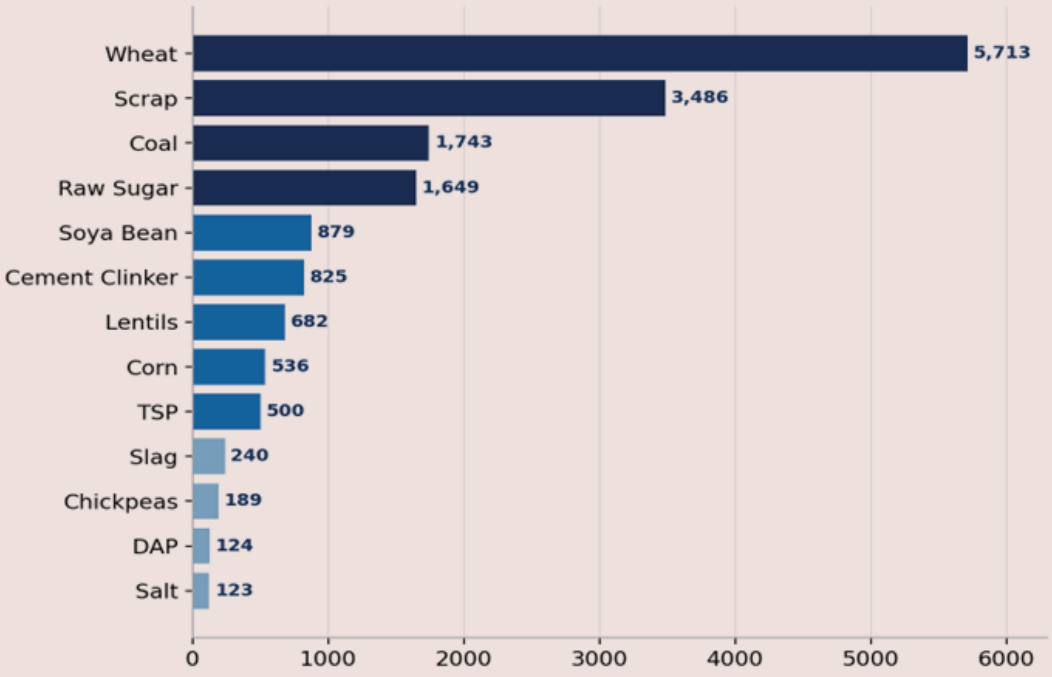

Figure 4. Total shortage allegation matters by cargo, 2022–2025 (MT).

By total alleged tonnage, **wheat (5,713 MT) and scrap (3,487 MT)** accounted for the largest share, together representing more than half of the total alleged shortage recorded during 2022–2025. Coal (1,743 MT), raw sugar (1,649 MT) and soya bean (879 MT) were the next most significant cargoes by alleged shortage quantity.

From a loss prevention perspective, these figures highlight the importance of maintaining particularly robust survey and

documentation procedures during wheat and scrap discharges, which together accounted for the majority of the alleged shortage tonnage handled by Interport over the four-year period.

Average Shortage Quantity per Cargo [2022-2025]

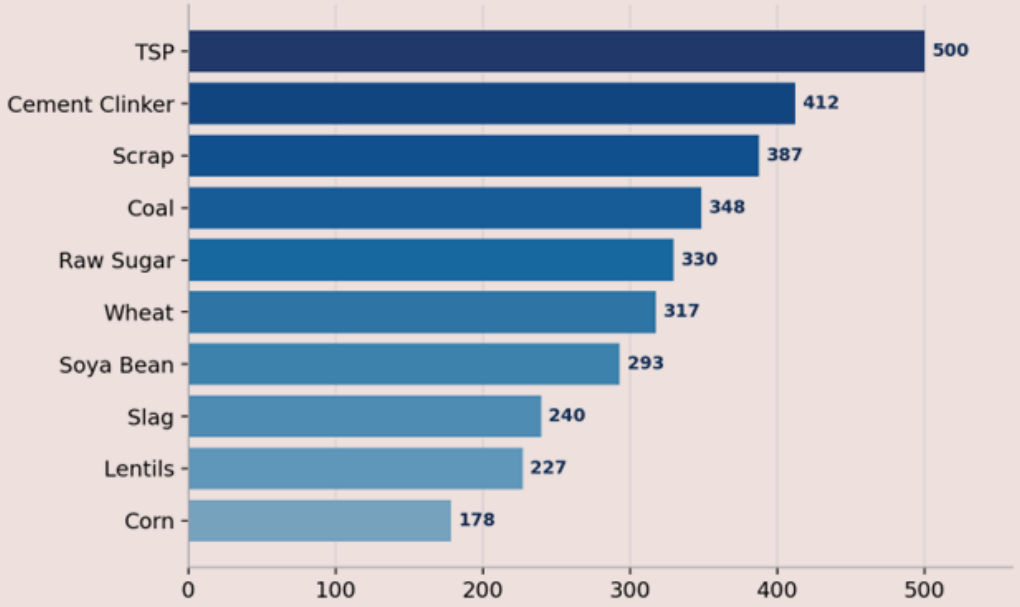

Figure 5. Average alleged shortage quantity per cargo (MT). Single-incident cargoes (e.g. TSP, Slag) shown for completeness.

The **average alleged shortage per incident** was highest for **cement clinker (412 MT)**, followed by scrap **(387 MT)** and coal **(349 MT)**. Wheat, although accounting for the highest number of shortage matters (figure 3), recorded a lower average alleged shortage of **317 MT** per incident.

These figures should be considered separately from the frequency of claims. A higher average does not necessarily mean that a particular cargo gives rise to shortage allegations more

often; it simply reflects the average quantity alleged in the matters recorded for that cargo. Conversely, a cargo such as wheat may feature in a greater number of matters while still showing a lower average alleged shortage per incident.
This distinction is important when assessing exposure. **Frequency indicates how often a particular cargo is involved, whereas the average figure indicates the typical quantity of the allegation in the recorded cases.**

Note: **TSP** and **Slag,** each of which was involved in **only one shortage matter** during the period, are included in the chart for completeness. **As the respective averages are based on a single incident, they should not be regarded as indicative of any broader trend.**

How the Cargo-Wise Shortage Quantity Differs from Year to Year

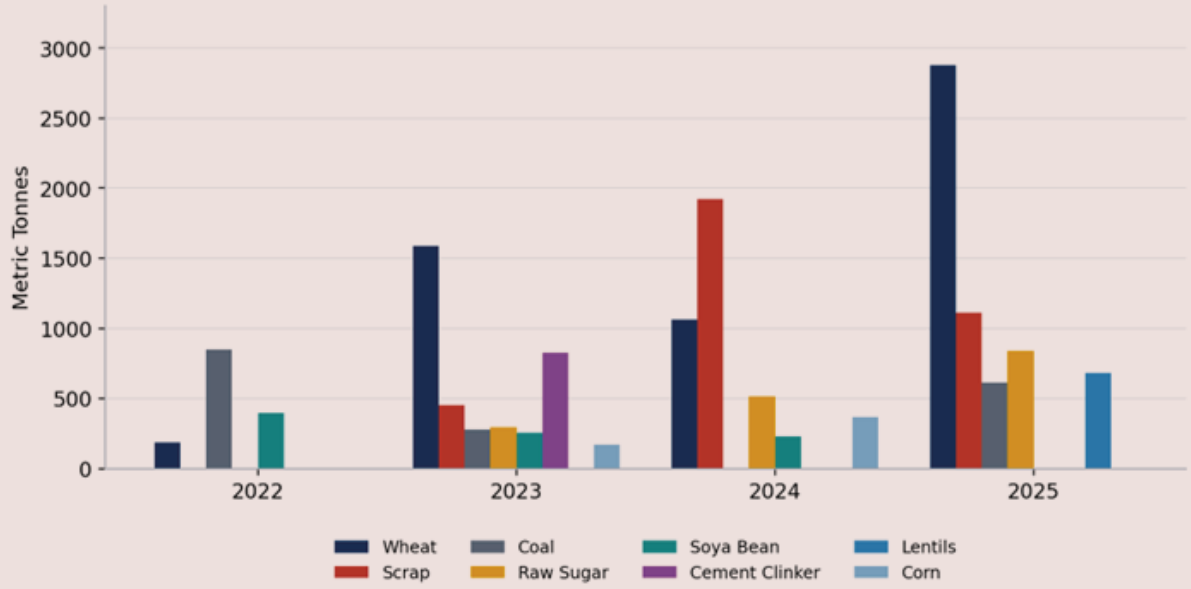

Figure 6. Alleged shortage quantity by cargo category, per year (MT).

The cargo profile of shortage allegations varied considerably from year to year. **Coal was the largest contributor in 2022,** while **wheat and cement clinker featured prominently in 2023** and **scrap accounted for the largest share in 2024,** including one allegation of approximately 1,021 MT.

In **2025, wheat increased significantly to approximately 2,877 MT,** representing the largest share of the year's alleged shortage, followed by scrap and raw sugar. The 2025 data also shows a **broader spread across cargo types,** including lentils and fertilisers, indicating that shortage allegations were not confined to the more commonly encountered wheat, scrap, coal and raw sugar cargoes.

Assessing 2025 Shortage Allegations against Survey Findings

The 2025 data shows that the shortage quantity initially alleged by cargo receivers or their surveyors does **not necessarily translate into the actual shortage quantum.** In a number of cases, the alleged shortage was either not substantiated or the quantum was reduced following the attendance and draft survey findings of the Shipowners' appointed surveyors.

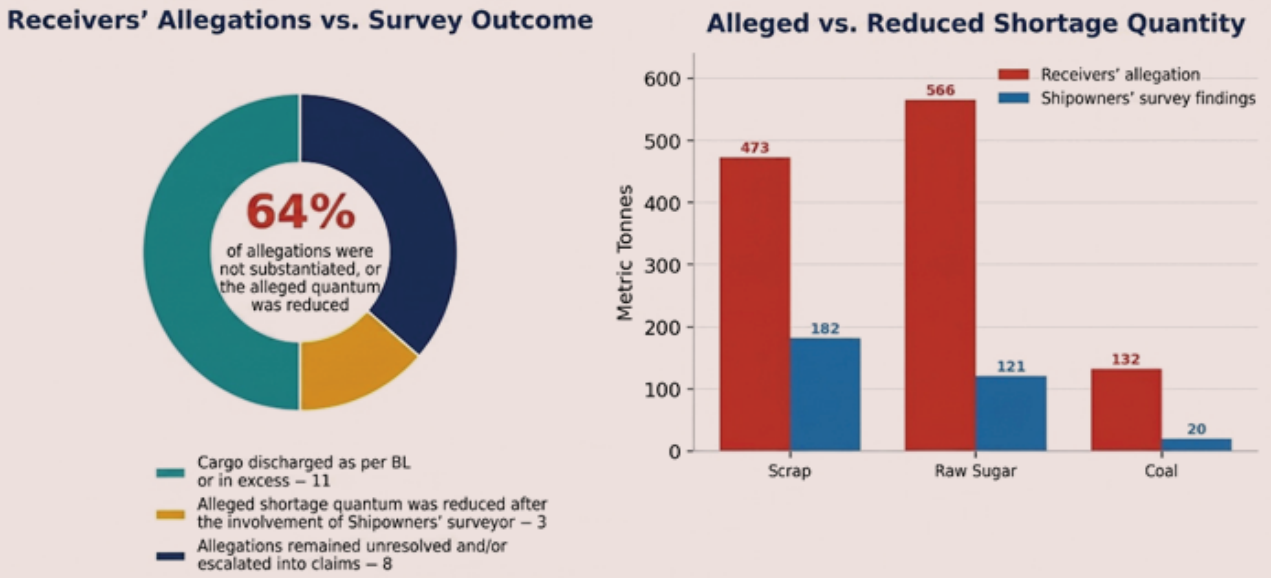

Figure 7.
Left: Outcomes of the 22 claims handled in 2025 compared with the receivers' shortage allegations. Right: Three 2025 cases in which Shipowners' surveyors' draft survey findings resulted in lower shortage figures.

Of the 22 shortage allegations handled in 2025, **14 (64%) were either not substantiated or the alleged quantum was reduced** following draft surveys conducted by surveyors appointed on behalf of the Shipowners. For example, in **11 matters,**

subsequent draft survey findings indicated that the full cargo quantity, or in some cases an excess quantity, had been discharged, disproving the shortage quantum initially alleged. In the remaining **3 matters** where a reduced shortage was recorded, the subsequent draft survey quantity averaged only **28% of the amount initially alleged.** By way of example, one raw sugar allegation of 566 MT was reduced to 121 MT, while a coal allegation of 132 MT was reduced to 20 MT following Shipowners' survey findings.

This highlights the practical aspects of engaging an experienced marine surveyor for draft survey at an early stage. Independent survey evidence can be critical in verifying the actual quantity discharged, challenging unsupported shortage allegations and best protecting the Members' interest before the alleged figures develop into formal claims.

Why Shortages Are Alleged

The potential causes of alleged cargo shortage at Bangladeshi ports fall into two broad groups — measurement and calculation issues, and physical loss or manipulation.

Measurement and Calculation

- **Errors in calculation during loading or discharge:** During the loading process, errors in measuring the cargo weight or determining the quantity of cargo though a draft survey may lead to an incorrect figure being recorded in the Bill of Lading, resulting in discrepancies between the actual and recorded cargo quantities, which may directly affect the amount of cargo the vessel is entitled to discharge. Similarly, errors in the draft survey at the discharge port can lead to discrepancies between the load port and discharge port figures.

- **Ship–shore measurement inaccuracies:** Inaccuracies can arise during cargo measurement, both on the vessel and at the shore. Differences in equipment calibration, lack of standardisation between ship and shore measurement techniques, or miscommunication between the involved parties can cause inconsistencies in the reported weight, leading to claims of shortage.

- **Manipulation of draft survey at discharge port:** Draft surveys are essential for determining the weight of cargo being discharged. However, in some cases, the survey may be manipulated by experienced consignee's surveyor, they may

take advantage either by altering the recorded draft or by inflating or deflating measurements to show a lower cargo weight than what the vessel actually carried, leading to fictitious claims.

Physical Loss and Pilferage

- **Inherent vice (natural weight loss):** Certain cargoes, especially dry bulk materials, may naturally lose weight due to moisture evaporation, shrinkage, or settling during transit. This loss in weight due to an inherent vice, can lead to discrepancies between the weight recorded during loading and the actual weight when discharged, especially if the moisture content isn't properly accounted for.

- **Spillage during handling:** Cargo can be lost during various stages of handling, including storage at the port, loading onto the vessel, and discharge operations. This loss could be the result of careless handling, poor infrastructure, or improper storage conditions, ultimately leading to discrepancies in the total weight of cargo delivered.

- **Pilferage:** Cargo pilferage can occur during loading, unloading, or storage operations, especially in ports with lax security. Stevedores or lighter vessel staff may collaborate to divert small quantities of cargo for personal gain, which, when accumulated, can contribute to a significant shortage claim.

Recommendations for Mitigating Shortage Claims

To protect Members' interests against short-landing claims, a key recommendation is to have **both initial and final draft surveys attended by an experienced and independent marine surveyor appointed on behalf of the Shipowners.**

Our claims handling records show that where surveyors were appointed on behalf of the Shipowners following shortage allegations, a significant proportion of the allegations were either not substantiated, or the alleged shortage quantum was found to have been substantially exaggerated. This highlights the value of timely surveyor attendance in verifying cargo quantities and preserving contemporaneous evidence in support of the Member's position.

Why the Draft Survey is Indispensable

- For dry bulk (wheat, soya bean, corn, raw sugar, cement clinker, fertilisers, coal, scrap, etc.), quantity is determined by a **Draft Survey** carried out jointly by surveyors for all parties.

- Draft survey findings are **accepted as evidence by the apex courts of Bangladesh.**

- Bangladeshi courts **no longer allow any trade allowance** for bulk cargo transport, although a customary 1% allowance for moisture-releasing cargoes (bulk soya bean, wheat, rice) previously applied.

- There is **no precedent for acceptance of a Club Letter of Undertaking (LOU)** in dry-bulk shortage cases. Consignees most often demand cash settlement.

Practical Measures at the Discharge Port

1. **Arrange for joint survey with Customs surveyor:** Ask the charterer/charterer's local agent to arrange the survey jointly with the Customs surveyor, to strengthen defence against Customs penalties for any potential short-landing.

2. **Protect the load-port position:** If a shortage was recorded at the load port, obtain an LOU/guarantee from charterers or amend the Bill of Lading before sailing, stating that the shipowner should not be liable for cargo already loaded short.

3. **Control document disclosure:** Advise the Master not to disclose the Load Port Draft Survey Report or Letters of Protest to the consignee's surveyor or local agents at discharge port, as it may prejudice the Member's interests. It is strongly recommended that the Master or Chief Officer discuss the issue with the attending marine surveyor if any such requests for documents are made by the opponents' surveyor or local agents. Alternatively, Club/Members may contact the Correspondents directly if any such requests are made by the opponent's surveyor or local agents.

4. **Brief the Shipowners' surveyor privately:** Invite the Shipowners' P&I surveyor to the Master's office separately to agree the scope of survey before information is shared with

other attending surveyors.

5. Appoint experienced marine surveyor: The onboard presence of an experienced marine surveyor representing the Shipowners considerably benefits in safeguarding their interests because error in reading draft at anchorage (open seas with variable swell) by inexperienced chief officers is common. The experienced consignee's surveyor may take advantage of this situation and manipulate the survey results.

6. Issue a Letter of Protest on disagreement: If the consignee's surveyor insists on their own draft reading, the Master/Chief Officer should immediately notify Shipowners and Charterers and issue an LOP to all concerned parties.

7. Plan the survey carefully: Declare constant, read drafts carefully with all surveyors, and record ballast water quantity to counter any manipulation during initial and final draft surveys.

8. Choose a reliable agent: Appoint an agent who will not detain the vessel and will accept a Club LOU, enabling prompt port clearance. Shipowners should insist that their appointed agent declare the vessel, while the receivers' nominated agent manages cargo-related formalities, including stevedoring and arranging lighters.

9. Fix the security position in the charterparty: State clearly in the CP that receivers will accept a Club LOU as security against any claim.

About Interport Maritime Limited:

We, Interport Maritime Limited, are the Marine Risk Management Division of Interport Group, serving as local P&I Correspondents, in Bangladesh for major International Group and Non-IG P&I Clubs, as well as fixed premium marine insurers, for the past two decades. As an active Working Group Member of MACN (Maritime Anti-Corruption Network) Bangladesh, Interport Maritime Limited is dedicated to promoting transparency, ensuring integrity and upholding the highest ethical standards at a global level, while Interport Group proudly holds the distinction of being the first and only Bangladeshi member of MACN. We have a strong client base across the Americas, Europe, and the Far East and is listed by 11 of the 12 International Group P&I Clubs, including being the exclusive correspondent for The Britannia Steam Ship Insurance Association Limited in Bangladesh.

On behalf of P&I Clubs', we protect the Shipowners, Operators and Charterers' interests by managing challenging claim incidents in Bangladesh. Operating 24/7, with dedicated duty officers during holidays, we provide immediate logistics support during any incident, working closely with local experts such as Marine Surveyors and Lawyers while maintaining a strong rapport with the local authorities. Acting as the local "eyes and ears" of the P&I Clubs, we ensure effective and competent claims handling coupled with loss prevention advise, safeguarding Shipowners' and Charterers' interests with integrity and professionalism.

Appendix A — Interport's Files Handling Data

Following data were utilised to create the charts in this report (source: Interport's proprietary files handling data, 2022–2025).

A1. Alleged shortage by year

Year	Vessels	Total alleged shortage (MT)
2022	5	1,576.3
2023	16	4,097.9
2024	11	4,213.4
2025	22	6,799.9
Total	**54**	**16,687.5**

A2. Alleged shortage by cargo (2022–2025)

Cargo	Claims	Total (MT)	Avg per claim (MT)
Wheat	18	5,712.6	317.4
Scrap	9	3,486.5	387.4
Coal	5	1,742.7	348.5
Raw Sugar	5	1,648.7	329.7
Soya Bean	3	878.9	293.0
Cement Clinker	2	824.8	412.4
Lentils	3	681.5	227.2
Corn	3	535.6	178.5
Other (5 types)	6	1,176.2	—

Other (5 types): TSP (500.0), Slag (239.7), Chickpeas (189.3), DAP (124.2), Salt (123.0).

Appendix B — Data Sources

Following data were utilised to create the charts in this report (source: Interport's proprietary files handling data, 2022–2025).

Claims data: All figures relating to shortage matters, including the number of cases, alleged shortage quantities, averages and the 2025 comparison between initial allegations and subsequent survey findings, are derived from **Interport's proprietary files handling data, 2022–2025.**

Import data: Commodity import figures have been compiled from publicly available sources and were reported on different formats, including USDA marketing years, Bangladesh financial years and calendar years, they should be treated as **indicative rather than as a single directly comparable statistical series.**

Principal sources include:

- **Wheat, corn and sugar volumes:** USDA Foreign Agricultural Service / PSD (via IndexMundi and USDA GAIN reports for Bangladesh).
- **Chittagong Port figures:** Chittagong Port Authority figures were reported by The Business Standard (record 137.7 M tonnes in FY2025–26; 130.7 M tonnes FY2024–25).
- **Cement clinker:** International Cement Review (CemNet) and The Business Standard.
- **Coal:** US EIA / IndexMundi and Bangladeshi trade press.
- **Ship/steel scrap:** NGO Shipbreaking Platform and The Business Standard (Chittagong Customs House data).

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Shortage Claims for Dry Bulk Cargo
16 August, 2026

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