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## **Tunisia**

# **Food and Agricultural Import Regulations and Standards Report**

## **FAIRS Annual Country Report**

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**Report Highlights:**

The Food and Agricultural Import Regulations and Standards (FAIRS) report provides an overview of the food laws and regulatory environment in Tunisia as it relates to U.S. food and agricultural exports. In 2018, Tunisia expanded the list of imported agricultural and food products subject to required technical specifications in an effort to decrease import volumes overall. Further such measures are expected in 2019. Meanwhile, Tunisia also appears poised to continue harmonizing its regulatory framework with the European Union.



**Disclaimer:**

This report was prepared by the Office of Agricultural Affairs of the USDA/Foreign Agricultural Service in Tunis, Tunisia for U.S. exporters of domestic food and agricultural products. While every possible care was taken in the preparation of this report, information provided may not be completely accurate either because policies have changed since its preparation, or because clear and consistent information about these policies was not available. It is highly recommended that U.S. exporters verify the full set of import requirements with their foreign customers, who are normally best equipped to research such matters with local authorities, before any goods are shipped.

**FINAL IMPORT APPROVAL OF ANY PRODUCT IS SUBJECT TO THE IMPORTING COUNTRY'S RULES AND REGULATIONS AS INTERPRETED BY BORDER OFFICIALS AT THE TIME OF PRODUCT ENTRY.**

Please contact this office, if you have any comments, corrections or suggestions about the material contained in this report at: [AgTunis@usda.gov](mailto:AgTunis@usda.gov)

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## Section I. General Food Laws:

Tunisia's [Food and Feed Safety Law](#) was approved in early 2019 with the aim of harmonizing Tunisian legislation with EU food directives 178/2002, 852/2004, 853/2004, 183/2005, 882/204, and 854/2004. The creation of a one-stop shop national food safety authority is currently under way. While all current regulations will likely need to be reviewed for consistency with the new food safety law, Tunisia's other relevant laws are as follows:

- [Law #92-72](#) (completed by [Law #99-5](#)) concerns the quarantine and phytosanitary requirements applied to unprocessed agricultural products of plant origin,
- [Law #99-24](#) sets the veterinary and sanitary controls of animals and animal products,
- [Law #99-42](#) (amended by [Law #2000-66](#)) sets the procedures for seeds and seedlings production, propagation, import, marketing and protection of the rights relating thereto,
- [Law #94-86](#) addresses market distribution channels and retail services, and
- [Law #92-117](#) concerns consumer protections.

Beyond the GOT's existing laws and implementing decrees and orders, Tunisia still generally lacks predictability and transparency regarding when and how measures are enacted, interpreted, and enforced through internal measures. Public access to Tunisian import requirements is also often restricted. At the same time, the implementation of Tunisia's regulations are also not always rigorous, particularly regulations that govern labeling, conditioning, handling, transport, and storage of agricultural and food products.

Through Ministry of Trade's [Decree #2016-503](#), Tunisia established a National Commission to ensure its compliance with WTO regulations and facilitate trade, which also coincided with Tunisia's third WTO [Trade Policy Review](#). However, Tunisia does not yet have a strong track record in notifying trade measures to the WTO, with virtually all of its relevant SPS and TBT measures having gone unnotified, including those with stated purpose of restricting trade.

## Section II. Food Additives Regulations:

The Ministry of Industry's [Order](#), issued on May 20, 1998, validated Tunisian standard NT 117-01 (1995) governs the use of food additives. The purpose of this standard is to give an exhaustive listing of authorized additives (positive list), their conditions of use as well as their respective identification E-numbers. This standard is largely based on European regulations (directive 94/35/EC on sweeteners for use in foodstuffs, directive 94/36/EC on colors for use in foodstuffs, and directive 95/2/EC on food additives other than colors and sweeteners).

## Section III. Pesticides and Other Contaminants:

### Registration

Pesticides are regulated by [Law # 92-72](#), completed by [Law # 99-5](#). They must be imported by an approved importer in accordance with the Book of Specifications (*Cahier des Charges*) established by Ministry of Agriculture's [Order](#), dated May 5, 2003. The pesticide must also be registered and officially authorized by the Ministry of Agriculture's official laboratory *Laboratoire de Contrôle et d'Analyse des Pesticides*. The registration procedure takes two years, including one year of experimentation.

### Maximum Residue Limits

The laboratory of the National Institute for Nutrition of the Ministry of Public Health (Laboratoire de l'Institut National de Nutrition) and the Central Laboratory of the Ministry of Industry (Laboratoire Central) are responsible for analysis in foodstuffs.

Pesticide MRLs are set in Tunisian standard NT 117-03, enacted in 1983. The standard states its equivalence to Codex Alimentarius Standard #100-1981 (Codex CAC/RS 100-1978).

Veterinary drug MRLs are set internally within the Ministry of Agriculture and not publicly available. However, Article 3 of a Joint Order from [January 4, 1996](#) (amended on [September 7, 2005](#)) includes reference to veterinary drugs allowed for use in feed along with other additives:

- Antibiotics
- Substances with anti-oxygen effects
- Coccidiostatics and medicinal substances
- Colorants, including pigments
- Emulsifying, stabilizing, thickening and jelling matters
- Vitamins and pro-vitamins
- Trace elements
- Conservation elements
- Binding, coagulating and anti-lumping agents
- Growth factors
- Aromatic substances
- Acid regulators

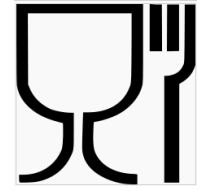
### Contaminants

The Ministries of Health, Trade and Agriculture's Joint [Order](#), dated May 13, 2013 (replacing Tunisian standard NT 117-02), sets Tunisia's maximum limits for food contaminants, including for metals, metalloids, and aflatoxins (B1, B2, G1, G2, M1, M2, ochratoxins and histamines).

Within Tunisia's Books of Specification and Technical Sheets, Tunisia also generally requires a certificate indicating the amount of dioxin residues for all imports of bulk and processed food items as well as a certificate of non-contamination from radioactivity, which may be issued by the country of origin or by Tunisia's National Center for Radioprotection after testing.

## Section IV. Packaging and Container Regulations:

[Decree #2003-1718](#), dated August 11, 2003, regulates materials intended to come into contact with foodstuffs and requires packaging bear the food grade international logo (shown to the right). The Decree does not apply to coating materials covering foodstuffs. This requirement entails either clearly stating on the container a short message (mandatory in Arabic and optional in other languages) such as “*material fit for food contact*” or featuring the logo.



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Tunisia has implemented ISPM15 regulating Wood Packaging Material in International Trade.

## Section V. Labeling Requirements:

### A. General Requirements

Ministry of Trade’s [Order](#) (September 3, 2008) regulates the labelling of all pre-packaged foodstuffs intended for retail and food service.

The following components are mandatory on labeling:

- Product name;
- Ingredients, including the full list in descending order of prevalence and allergens clearly labeled;
- Net weight using metric units of volume (*liter, milliliter...*) for liquids and weight (*kilograms, grams...*) for non-liquids. Food items packed in a liquid container must list the net drained weight;
- Date of production and shelf life shall be listed as: day/month/year;
- Date limit for use or date limit for optimum use, as well as any specific conditions of safety and use;
- Name or the trade name and the complete address of the manufacturer or the packager;
- Number of the lot;
- Place of origin; and
- Storage instructions, such as ‘keep in a cool place, protect from light or from dampness’ must be indicated when necessary, and important use instructions in the case their omission does not allow appropriate use.

The labeling shall comply with the following:

- Labels appended on pre-packaged foodstuffs shall not describe or present the product in a deceptive or untruthful way;
- Pre-packaged food shall not be sold without labeling;
- The sale and distribution of pre-packaged food is prohibited following the expiry date on the label;
- Only products not having exceeded the midpoint of their shelf-life may be imported into Tunisia;
- Indications on the label shall use indelible ink or by molding or engraving.

- The labels shall be fixed in a way that they cannot be detached from the container;
- Arabic language is required on the label.
- Required information for labelling must be easily understandable, in clear view, legible, and indelible. It must by no means be hidden, warped, or separated by other indications or pictures.
- For foodstuffs processed by ionizing radiation, the label shall bear either the expression: "*processed by ionizing radiation*" or "*processed by ionization*" immediately next to the product name. The use of the international symbol of food irradiation (shown to the right) indicated in the regulations in force is optional, but when it is used, it must appear immediately close to the product name;
- For irradiated product used as an ingredient in another product, it must be mentioned in the ingredients list, and when a product is prepared from an ingredient processed by irradiation, the product label must bear an expression indicating the applied processing;
- For pre-packaged food product containing pork, pork fat or beef fat, it must be clearly mentioned by their specific names on the label;
- For foodstuffs containing genetically-engineered materials, this must be clearly mentioned on the label;
- For product containing alcohol, the label must clearly bear the expression "*product containing alcohol*";
- For mail-order sales, the catalogues, booklets, leaflets or advertisements which make the consumer know the products supplied for sale and allow him to place directly his order shall comply with the same provisions;
- For goods having a shelf-life of three months or more, the mention of the month and the year is sufficient.
- For non-perishable goods, a time limit for optimum use must be indicated using one of the following sentences: '*to be consumed preferably before.../to be consumed preferably before end of.../ to be consumed preferably within a period of...*'
- The use of a sticker to rectify or correct required information is prohibited; [Note: in practice, stickers are used by importers/retailers to include required information, e.g., Arabic]



## **B. Other Specific Labeling Requirements**

### **Nutritional Labeling**

The Ministry of Trade's [Order](#), dated September 3, 2008, is partially inspired by the European Union regulations of 2006 on the use of nutrition and health claims for foods. The Order sets forth the rules for health or nutritional claims (such as "low fat" and "helps lower cholesterol") on foodstuffs based on nutrient profiles by means of positive lists of authorized claims that can be made on food. Health claims are prohibited on food intended for babies and children. Nutritional labeling of vitamins, minerals, and other nutrients is mandatory when a producer is making health or dietary claims on the label. This provision applies to fortified products and to food items intended for a particular use (e.g. infant formula). Otherwise, nutrition information is voluntary.

If the nutritional content is declared on the label, it is mandatory to display the energetic value, protein, carbohydrates (food fibers excluded), and lipids, and the quantity of any other nutritional element subject to a nutritional claim. The quantity of protein shall be calculated according to the following

formula:  $Protein = total\ nitrogen\ (kjeldhal) \times 6.25$ . The quantity of energy must be calculated using the following coefficients:

<i>Carbohydrates</i>	<i>4 Kcal/g-17KJ</i>
<i>Polyalcohol</i>	<i>2.4 Kcal/g-10KJ/g</i>
<i>Protein</i>	<i>4 Kcal/g-17KJ</i>
<i>Lipid</i>	<i>9 Kcal/g-37KJ</i>
<i>Alcohol (ethanol)</i>	<i>7 Kcal/g-29KJ</i>
<i>Organic acid</i>	<i>3 Kcal/g/13KJ</i>

### Environmental Labeling

Tunisia has an environmental labeling requirement that applies for pre-packaged food items made entirely or partially of plastic, canned food made of white iron metal and aluminum cans with capacity greater than 100 milliliter. So far this requirement is only enforced for bottled water and soft drinks. [Decree #97-1102](#), dated on June 2, 1997, and amended by [Decree #2001-843](#), dated on April 10, 2001, mandates a national system managed by the National Agency for Environmental Protection (ANPE), to collect and recycle used packaging. The manufacturer or the importer has four options to comply with this regulation:

- Retrieve and recycle used packaging
- Entrust the implementation of this obligation to an approved company on a contractual basis
- Enroll in the state-owned recycling system, which gives the right to print the Eco-leaf logo (shown to the right) on the product’s label.
- Re-use the package or use it in another industrial process.



### Food Quality Label

Ministry of Industry and Technology’s [Decree #2010-2525](#) regulates the use quality label called "*Food Quality Label Tunisia*," which may be awarded to processed foodstuffs with a higher, specific, or traditional quality attributes. date, only Tunisian products have been approved to use the quality label.



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## Section VI. Other Specific Standards:

### Animals and Animal Products

[Law #2005-95](#) serves as the legal basis for Tunisia’s production, processing, and marketing of dairy, livestock, and poultry and products thereof.



### *Live Animals & Genetics*

In 2017 and 2018, the United States and Tunisia agreed to [sanitary certificates](#) to facilitate the trade of U.S. bovine semen, breeding cattle, sheep and goats, and day-old chicks and hatching eggs.

### *Dairy Products*

In 2012, the United States and Tunisia agreed to a [sanitary certificate](#) to facilitate the trade of U.S. dairy products.

The Ministries of Industry and Trade regulate milk powder imports through a quota allocation system according to a Book of Specifications. Quotas are allocated on the basis of the annual requests presented by the end-users (cheese and yoghurt processors).

### *Treated Hides and Skins of Ungulates*

In 2008, the United States and Tunisia agreed to a [sanitary certificate](#) to facilitate the trade of U.S. treated hides and skins of ungulates.

## **Plants and Plant Products**

Ministry of Agriculture's [Order](#), dated February 19, 2016, requires an original phytosanitary certificate conforming to the model established by the International Plant Protection Convention (IPPC) to accompany all shipments of plants or plant parts into Tunisia. The certificate shall be issued no more than 14 days before export. If the exporting country is not the country of origin, shipments shall be accompanied by a re-export certificate and the phytosanitary certificate issued by the country of origin, otherwise the exporting country must mention the country of origin on its certificate. The phytosanitary certificate must specify that plants are free of certain diseases, as listed in Ministry of Agriculture's [Order](#), dated May 31, 2012, and it shall include an additional statement attesting that the plants or the plant parts comply with the requirements in Article #4 of the Order dated February 19, 2016.

Ministry of Agriculture's [Order](#), dated June 26, 2015, provides a list of banned plant products, including includes citrus and dates from all countries, apples and pears from all countries with Fire blight (*Erwinia amylovora*), and alfalfa from all countries with Bayoud (*Fusarium oxysporum* fsp. *albedinis*). See also GAIN: [Plant Products Banned from Import into Tunisia](#).

### *Seeds and Seedlings*

The phytosanitary conditions for the imports of seeds and seedlings as well as the Book of Specifications for seed production, storage, and packaging are detailed in the following decrees:

- [Decree #2000-101](#) (January 18, 2000);
- [Decree #2002-621](#) (March 19, 2002);
- [Decree #2004-2179](#) (September 14, 2004), which amends Decree #2000-101;
- [Decree #2007-1104](#) (May 2, 2007), which amends Decrees #2000-101 and #2002-621;
- [Decree #2017-991](#) (August 15, 2017), which amends Decree #2000-101.

### *Wheat and Barley*

The Ministry of Agriculture outlines the requirements for the purchase of locally produced wheat and the sale domestically of local and imported wheat in [Decree #2012-621](#). Under the supervision of the Ministry of Agriculture, Tunisia's Office of Cereals (OCT) maintains an effective import monopoly on durum wheat, common wheat, and barley. Imports by private entities are only permitted under a re-export program. Import requirements also accompany tenders in a Book of Specifications, which stipulates that U.S. wheat contracts shall correlate with USDA/FGIS standards. See also GAIN: [Discount Schedule for Internal Sale Price of Imported Wheat](#).

### *Corn and Soybean Meal*

The Ministries of Trade and Agriculture's Joint Order of [January 11, 1997](#) sets the import requirements for corn and soybean meal. See also GAIN: [Corn and Soybean Meal Import Requirements](#).

### *Distiller's Dried Grains with Solubles (DDGS)*

Tunisia's import requirements for DDGS are established via an internal "technical sheet". See GAIN: [DDGS Import Requirements](#).

### *Feed and Feed Ingredients*

The Ministries of Agriculture, Public Health, and Trade's Joint Orders from [July 29, 1999](#) and [September 12, 2001](#) regulate feed production, marketing, labeling, and quality controls. The Ministries of Health and Agriculture's Joint Order of [July 9, 2009](#) laid out the authorized substances in the compound feed formulation and the limits for the unauthorized ones.

To import ingredients for compound feed production, importers are required to maintain a register showing:

- Name and quantities of imported ingredients
- Name and address of supplier
- Date of production of ingredients
- Name and address of buyers
- Quantities and numbers of lots of ingredients sold or in stock
- Analysis certificates giving contents of noxious elements

### **Beer, Wine, and Spirits**

Alcoholic beverage imports into Tunisia are restricted to authorized companies. All imports must be registered and stamped by Ministry of Finance at the point of entry. Distribution and sales of alcoholic drinks is also controlled by Government according to the [Law #98-14](#) (amended by [Law #2004-76](#)) with only few companies, including major modern retailers in Tunisia allowed to conduct these activities. The Ministries of Commerce and Interior's Joint Order from December 14, 2006 sets the conditions for retail sales. Sales for on-site consumption are only authorized to hotels, restaurants, and a few bars.

## Section VII. Facility and Product Registration Requirements:

Tunisia has no known facility or product registration requirements other than those listed in other sections of this report.

## Section VIII. Other Certifications and Testing Requirements

Ministry of Industry's [Order](#) (April 16, 2013) canceled several mandatory product specifications, including but not limited to citrus, apples, table grapes, almonds, hazelnuts, dried fruit, common wheat, and durum wheat.

### Free-Import Regime / Import Licenses

[Law #94-41](#) (March 7, 1994) largely allows importers to operate under a free-import regime without first requiring prior authorization via an import license. Products not under the free-import regime require an import authorization granted by the Ministry of Trade that generally lasts for one year. [Decree #94-1742](#) (August 29, 1994), amended by [Decree #95-2277](#) (November 13, 1995), [Decree #2000-1803](#) (July 31, 2000), and [Decree #2001-842](#) (April 10, 2001), established the list of products excluded from the free-import regime.

[Decree #94-1743](#) (August 29, 1994), established the modalities for importers operating under the free-import regime. To obtain a license, a number of documents are required, such as the commercial contract (or other equivalent documents), as well as information about the contracting parties, the products, their origin and where they come from.

Exceptions also apply for companies operating under re-export programs or in free trade zones.

### Technical Controls

[Decree #94-1744](#) (August 29, 1994), updated by [Decree # 99-1233](#) (May 31, 1999) and [Decree #2010-1684](#) (July 5, 2010), concerns technical inspection procedures for imported products entering Tunisia under the free-import regime. Ministry of Economy's [Order](#) (August 30, 1994), amended by Ministry of Trade's [Order](#) (September 15, 2005), defines the list of products subject to one of three categories of technical control measures:

- *List A: Products Imported under Systemic Technical Control* – Such products are subject to a conformity assessment against established technical regulations for each shipment which may require additional sampling and laboratory analysis regardless of whether the product has or has not been already tested in the past.
- *List B: Products under the Certification Regime* – Such products may be cleared by Customs as long as they are accompanied by a certificate issued by the country of origin which states that the goods are in compliance with international standards. Agricultural products are no longer among products subject to the *Certification Regime*.

- *List C: Products under the Cahiers de Charges* – Such products are subject to conformity with conditions defined by a GOT-sanctioned Book of Specifications. Conditions often include conditions regarding the importer’s eligibility in terms of storage capacity, funding availability, production data disclosure, etc.

## Section IX. Import Procedures:

In February 2017, Tunisia ratified the WTO’s Trade Facilitation Agreement and has notified 59.7% of its commitments as Category A with remaining commitments yet unnotified.

The customs clearance process for a product imported under the free-import regime takes less than 12 days on average and is composed of two essential steps:

- 1) **Declaration:** Import declarations may be completed online with the Tunisian customs office and consists of an application form along with documents cited below.
  - Request an ‘**Autorisation de Mise à la Consommation**’ (AMC) and/or an ‘**Autorisation Provisoire d’Enlèvement**’ (APE), bearing the signature of the importer, in accordance with the model of the single bundle enacted by Ministry of Trade’s [Order](#) of November 14, 2000. Note: The APE is a provisional document used in absence of the AMC to expedite customs clearance; however, importers must refrain from distributing or further processing the imported good until the AMC is delivered by the Ministry of Trade, Directorate of Quality and Consumer Protection. The AME provides authorization for the importer to sell the product in the marketplace.
  - **Commercial Invoice:** Since October 2006, customs clearance requires domiciliation of the commercial invoice with an approved financial intermediary (i.e. commercial bank). Tunisia’s Central Bank prohibits the flow of currency out of Tunisia as payment for imports before documents are presented to the issuing bank confirming that the merchandise has entered the country.
  - **Certificate of Origin,**
  - **Packing List,**
  - **Bill of Lading,**
  - **Technical Notice** describing the composition of product, the number of lot, the date of production and the validity period, safety requirements, rules of storage, compliance certificate, and analyses...
  - Other document (s) at the discretion of the Authorities

The time required to file an import declaration is estimated at 45 minutes.

- 2) **Custom Control:** All products that arrive for entry are systematically sorted by Customs’ information system “SINDA (Système d’information douanier automatisé)” according to certain criteria, including the type of the product and the importer. The products are then inspected accordingly to the procedures described in **Section VIII** in order to receive the AMC (Autorisation de Mise à la Consommation).

This operation can take up to 20 days depending on the product.

Customs fees are assessed at about 3%.

## **Section X. Copyright and/or Trademark Laws:**

[Law #94-36](#) protects copyrights and established the Tunisian Institution for the Protection of Copyright (Organisme Tunisien de Protection des Droits d'auteur). According to Article 18, the copyright shall be valid during the author's lifetime and must continue for fifty calendar years after the author's death. The law established monetary sanctions for violations or infringements.

[Law # 2001-36](#) (completed by [Law # 2007-50](#)) protects trademarks and brand names. Registration with the National Institute for Standardization and Industrial Property (INNORPI) is required to obtain protection and is normally issued upon filling an application for registration. A trademark registration is valid for fifteen years from the date on which the application for registration is filled. It may be renewed indefinitely for similar periods of time. Tunisia does not require use of a trademark as a condition for maintaining registration.

Ministry of Finance's [Order](#), dated January 11, 2016, outlines Customs procedures to stop trade of goods suspected of violating copyright and/or trademark laws.

Tunisia is a member of WIPO (World Intellectual Property Organization) and has signed most WIPO agreements. Tunisia is also a WTO member and thereby a signatory to the TRIPS agreement.

In 2018, the European Union proposed to Tunisia mutual recognition of each party's Geographical Indications.

## Appendix I. Government Regulatory Agency Contacts:

### *Ministry of Agriculture, Environment and Hydraulic Resources*

#### **Directorate General for Veterinary Services**

30, rue Alain Savary, 1002, Tunis, Tunisia

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#### **Directorate General for Agricultural Production**

Ministry of Agriculture, Environment and Hydraulic Resources

30, rue Alain Savary, 1002, Tunis, Tunisia

Phone: +216 71 786 833

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#### **Directorate General for Crop Protection and Quality of Agricultural Products**

Ministry of Agriculture, Environment and Hydraulic Resources

30, rue Alain Savary, 1002, Tunis, Tunisia

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E-mail: [mag@ministeres.tn](mailto:mag@ministeres.tn)

#### **Cereal Board of Tunisia (OCT)**

65, Rue de la Syrie 1002 -Belvédère- Tunis

Phone: +216 71 800 040

E-mail: [octmail@gnet.tn](mailto:octmail@gnet.tn)

Web: <http://www.oc.agrinet.tn/index.php/fr/>

### *Ministry of Trade*

#### **Directorate of Quality and Consumer Protection (DQPC)**

37, av. Keireddine Pacha, 1002 Tunis

Phone: +216 71 890-070 / 890 337

E-mail: [mcmr@ministeres.tn](mailto:mcmr@ministeres.tn)

#### **Trade Board of Tunisia**

65, Rue de la Syrie 1002 -Belvédère- Tunis

Phone: +216 71 800-040

### *Ministry of Industry*

#### **National Institute for Standardization and Industrial Property (INNORPI)**

BP 23 - 1012 Tunis Belvédère

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Web: <http://www.innorpi.tn/>

#### **Packaging Technical Centre (PACKTEC)**

Cité El Khadra, par la rue Alain SAVARY. BP 64 .1003 Tunis.

Tel: +216 71 772 755

Fax: +216 71 773 300

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Web: <http://www.packtec.tn/>

### *Ministry of Public Health*

#### **National Agency of Sanitary and Environmental Control of Products (ANCSEP)**

2 rue Ibn Nadim Monplaisir Ville Tunis

Phone: +216 71 966-687

E-mail: [ancsep@ancsep.com.tn](mailto:ancsep@ancsep.com.tn)

Web: <http://www.ancsep.rns.tn/>

#### **Tunisian Institution for the Protection of Copyright**

37 Rue Mikhail Nouaima, 1005 El Omrane Tunis Tunisie

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### *Ministry of Finance*

#### **Directorate General for Customs Services**

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### *Other Agencies*

#### **Tunisian Central Bank**

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### *Ministry of Culture*

## Appendix II. Other Import Specialist Contacts:

### *U.S. Government*

#### **Office of Agricultural Affairs**

U.S. Embassy Tunis

Morocco and Tunisia

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#### **Animal and Plant Health Inspection Service**

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#### **Office of Patent and Trademark**

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