

**Required Report:** Required - Public Distribution

**Date:** January 02, 2024

**Report Number:** PK2023-0021

**Report Name:** FAIRS Annual Country Report Annual

**Country:** Pakistan

**Post:** Islamabad

**Report Category:** FAIRS Country Report

**Prepared By:** Asmat Raza

**Approved By:** Christopher Rittgers

**Report Highlights:**

The report outlines regulatory requirements and import procedures for food and agricultural imports into Pakistan. As compared to the last report submitted in December 2022, this report contains additions to food laws, packaging, and common delays sections. Lack of clarity on regulations to import genetically engineered commodities for food, feed, and processing caused soybean imports to stop as of November 2022. High import duties and labelling and halal requirements hinder opportunities for most types of food imports. The federal government regulates Pakistan's food imports, and the provincial governments regulate food safety standards.

**Disclaimer:**

This report was prepared by the Office of Agricultural Affairs of the USDA/Foreign Agricultural Service in Islamabad, Pakistan 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.

**Table of Contents:**

**Section I. Food Laws:** ..... 3

**Section II. Food Additive Regulations:** ..... 9

**Section III. Pesticides and Other Contaminants:**..... 10

**Section IV. Packaging and Container Regulations:** ..... 10

**Section V. Labeling Requirements:** ..... 10

**Section VI. Other Regulations and Requirements:**..... 13

**Section VII. Other Specific Standards:**..... 14

**Section VIII. Copyright and/or Trademark Laws:**..... 14

**Section IX. Import Procedures:** ..... 15

**Section X. Trade Facilitation:** ..... 16

**Appendix I. Government Regulatory Agency Contacts:** ..... 17

**Appendix II. Other Import Specialist Contacts:** ..... 18

**Executive Summary:**

The Ministry of National Food Security and Research (MNFSR) regulates agricultural imports with the assistance of customs officials who clear shipments at the ports of entry. The federal government generally applies Codex standards and guidelines in its regulation of imported food products. The U.S. Food and Drug Administration (USFDA) requirements are also accepted for certain products. For animal products, "Halal" certification is required. In 2016, the Pakistan Halal Authority (PHA) was established under Ministry of Science and Technology (MoST) to regulate trade and commerce in Halal articles and processes. Processed foods are regulated under the Pakistan Pure Food Laws (PFL) of 1963, as revised in 2007. The PFL is the basis for the food quality and safety regulatory framework. The Pakistan Standards and Quality Control Authority (PSQCA) is the national standards body. It develops and adopts standards and provides conformity and testing assessments. The federal government's primary concern regarding imported food is shelf life. On July 1, 2019, Pakistan's Ministry of Commerce (MOC) implemented new requirements for all consumer food and beverage imported products. The importation of food products containing pork or pork products is prohibited. The commercial importation of alcoholic beverages or products containing alcohol is also prohibited. The Government of Pakistan has adopted the Codex list/standards for food additives. Pakistan requires food imports to be accompanied by a written certification from the producer and exporting country that the products have been produced under sanitary conditions and in disease free areas. The exporter must provide a certificate of origin for all shipments. Pakistan generally follows European standards for weights and measurements. U.S. weights and measures are also acceptable. All imports into Pakistan are governed by the Import Policy Order issued by the MOC. English is the official language. All agencies will accept documents in English and will respond in English.

Lack of clarity on regulations governing imports genetically engineered (GE) products has resulted in a stoppage in soybean imports as of November 2022. High import duties on most food products hinders growth in food imports. Import tariffs on consumer food products range from zero to 150 percent, but most products face exorbitant regulatory duties ranging from 35 to 75 percent.

**Section I. Food Laws:**

The government of Pakistan does not have a single regulatory authority for food safety control. The subject of food control is scattered in the federal government's ministries of food, science, health, and industry. Recently, provincial food authorities have also emerged as important players in their respective jurisdictions. The agriculture, livestock, food, and industry departments of provincial governments also enforce some regulations.

Pakistan does not have an overarching regulatory framework but a set of laws. These laws and their rules and regulations provide multiple ministries and agencies at the federal and provincial levels the authority to exercise sectoral controls over food from production to consumption. However, the controls are mostly end-product based and reactive.

### **The Federal Government is the Primary Regulator of Imported Foods:**

The Ministry of Food Security and Research (MNFSR), which carries out the functions of a typical Ministry of Agriculture, drafted a National Agriculture and Food Security Action Plan, which is part of the National Agriculture and Food Security policy. MNFSR appears to have shelved plans to establish a single national food safety, animal, and plant health regulatory authority (NAPHIS) and is continuing with the existing system of separate regulatory agencies. For nearly a decade, the government worked to create a single national food safety, animal, and plant health regulatory authority (NAPHIS) with expanded staffing and resources.

Offices within the MNFSR regulate agricultural imports such as processed foods, animals, commodities, and plants with the assistance of customs officials who clear shipments at the ports of entry. The federal government generally applies Codex standards and guidelines in its regulation of imported food products. The U.S. Food and Drug Administration (USFDA) requirements are also accepted for certain products. A list of permissible food colors is updated every year. For animal products, "Halal" certification (slaughtered in accordance with Islamic law) is required. Pakistan's Halal Authority (PHA) is responsible for implementing the Halal Foods Act of 2016, which requires U.S.-based accreditors to be recognized by the Government of Pakistan. MNFSR, at the federal level, is responsible for the oversight and regulation of imported food and agricultural products. In the event of an issue with the safety of an imported food or agricultural product, the provinces are responsible for contacting federal officials.

Provincial governments are responsible for enforcing food standards and regulations for domestically produced products, but do not have enforcement authority over imported food. Pakistan's 18<sup>th</sup> Constitutional Amendment devolved many federal functions to the provinces. While the provinces generally adopt federal regulations and requirements, some are considering developing separate provincial regulatory requirements that could affect the distribution of domestically produced products. For example, the Punjab government established the Punjab Food Authority to improve the implementation of food laws and to provide for the safety and standards of food. The Governments of Khyber Pakhtunkhwa (KPK) and Sindh have each passed food safety acts, paving the way for the establishment of provincial food safety authorities. At this stage, it is not clear how these provincial authorities will relate to federal oversight.

Processed foods are regulated under the Pakistan Pure Food Laws (PFL) of 1963, as revised in 2007. The PFL is the basis for the food quality and safety regulatory framework and covers 104 food items falling under nine broad categories: milk and milk products, edible oils and fat products, beverages, food grains and cereals, starchy food, spices and condiments, sweetening agents, fruits and vegetables, and miscellaneous food products. These regulations also address purity issues in raw food and deal with additives, food preservatives, food and synthetic colors, antioxidants, and heavy metals. For certain products and ingredients, the PFL also applies to imported foods. If an imported food or ingredient is not listed in the PFL or subject to domestic regulations, Codex and possibly the provisions of the exporting country (e.g., US FDA) are consulted and applied as appropriate.

In 2016, PHA was established under Ministry of Science and Technology (MoST) to regulate trade and commerce in Halal articles and processes. PHA is responsible for ascertaining the halal status of both imported and domestically produced products. Information regarding PHA can be accessed at:

## Chronology of Food Laws in Pakistan

**1960** -- The West Pakistan Pure Food Ordinance was created to control standards for the preparation and sales of food in what was then known as West Pakistan. It prohibits things such as false guarantees about food quality and the unauthorized mixing of ingredients and chemicals in food.

**1996** -- The Pakistan Standard and Quality Control Authority was established and oversees food testing and inspecting mechanisms. It has the authority to inspect, sample, fine, and revoke the licenses of any authorities that do not comply with standards. It also provides training to local authorities to oversee standards.

**2016** – Pakistan establishes Halal Foods Act to be implemented by the National Accreditation Council.

### **Food Standards:**

Pakistan, as a member of the International Organization for Standardization (ISO), continues to harmonize standards with international guidelines. The national standards cover agriculture, foodstuffs, chemicals, and textiles. Standards covering 47 products (among them edible oils, biscuits, and bottled water) are mandatory for human safety and public health reasons under the Compulsory Certification Mark License Scheme. These goods, whether imported or domestic, must meet Pakistani standards, which are generally harmonized with international guidelines. The Pakistan Standards and Quality Control Authority (PSQCA), under the Ministry of Science and Technology remains the national standards body. It develops and adopts standards and provides conformity and testing assessments. Domestic manufacturers and exporters must be registered with the PSQCA to ensure compliance. In performing its duties and functions, PSQCA is governed by the PSQCA Act, 1996. PSQCA is a member of ISO and is the apex body to formulate or adopt international standards.

PSQCA also:

- Serves as the focal point for national, regional, and international organizations such as ISO, Codex Alimentarius, and the World Trade Organization (WTO).
- Serves as the national inquiry point (NEP) for standards and issues related to technical barriers to trade (TBT).
- Introduces measures for standardization regarding consumer safety and health.
- Establishes procedures for conformity assessment compliant with national and international standards.

PSQCA has the mandate to inspect and test products and services, including food items, for their quality, specification, and characteristics during use, and for import and export purposes. PNAC remains the national accreditation body for testing laboratories and other conformity assessment facilities. It applies international standards and has accredited 24 testing and calibration laboratories.

The Council of Common Interest (CCI) has been mandated the provincial food authorities to enforce food quality grades set by PSQCA. Food industry had been demanding the federal and the provincial governments to eliminate multiple standards set by different food authorities in the country. Earlier, the

provinces were not ready to accept the role of PSQCA in the registering, monitoring, and implementing consumer items.

Further information about PSQCA can be obtained at:

[PSQCA | Pakistan Standard & Quality Control Authority](#)

### **Other Issues Affecting Importers:**

The federal government's primary concern regarding imported food is shelf life. On July 1, 2019, Pakistan's MOC implemented new requirements for all consumer food and beverage imported products. According to these requirements, all consumer food and beverage imported products must have 50 percent of shelf life remaining, from the date of filing the Import General Manifest (IGM); 66 percent of shelf life remaining from the date of manufacturing; and must be from a halal certified supplier accredited by SMIIC and IHAF, and in case packaging. Each shipment must be accompanied by a 'Halal Certificate' issued by a Halal Certification Body (HCB) accredited by an Accreditation Body (AB) that is a member of either the International Halal Accreditation Forum (IHAF) or the Standards and Metrology Institute for the Islamic Countries (SMIIC). The contents of the case must have a halal logo and case packaging/contents of the case must have Urdu translation. Adhesive labels are not permitted. This requirement applies to both animal and plant products.

To ensure that shelf-life requirements are met, correct labeling is critical. Each retail pack must have the production and expiration dates printed on the label. Dates should be printed in day/month/year format. In addition to shelf life and labeling, certain products are banned for religious reasons. The importation of food products containing pork or pork products is prohibited. Meats, animal products, and products containing animal ingredients can be imported if certified to be "Halal." Pakistan may require other specific certificates based on worldwide alerts or other emergency situations. Commercial import of alcoholic beverages or products containing alcohol is also prohibited.

Pakistan controls certain imports through a "negative list." The negative list is comprised of (a) items banned for reasons of religion, security, or luxury consumption; (b) capital and consumer goods banned to protect a domestic industry; and (c) intermediate goods used to produce protected goods. Pakistan also maintains a "restricted list" of items that may be imported only by certain parties (i.e., the government or other specified users) or under certain arrangements (such as imports against credit).

Other than the exceptions cited above, there are no federal restrictions on the importation of consumer foods. U.S. exporters have had problems with requirements, due to the use of bar-code labels that do not have printed dates of manufacture and expiration. As a result, U.S. suppliers using bar-coded labels alone will incur the extra cost of printing new labels with the printed production and expiration dates on each retail pack prior to export to Pakistan. More information on labeling requirements is available under Section V of this report.

At the time of import, the Federal Customs Department checks the Pure Food Laws (PFL) standards to determine whether an item is deemed importable. To ensure that an imported product meets provincial health requirements, the exporter and/or his or her agent should contact the Provincial Health Departments to verify that the product meets the requirements of the PFL.

Lack of clarity on regulations governing GE commodity imports for food, feed, and processing (FFP) resulted in a stoppage of soybean imports as of November 2022. GE soybean imports require importers to obtain a license from Ministry of Climate Change (MOCC), but MOCC has never issued a license for soybeans for FFP.

The National Biosafety Committee (NBC) has drafted amendments to the Pakistan Biosafety Rules (PBR) that would potentially create a system for importers to obtain an import license for GE commodities destined to FFP. The draft amendments were rejected by the Cabinet sub-committee in August 2023 and sent back to the NBC for reevaluation. The NBC has indicated an intent to resubmit the amendments to Cabinet in the final quarter of 2023.

The import of meat and meat products from the United States is not allowed because the health certificate between the two countries for the import of these categories is not finalized. Negotiations are in process to resolve the issue.

Pakistan imposes high import duties on most food products, hindering the growth of food imports. Import tariffs on consumer food products range from zero to 150 percent, but most products face exorbitant regulatory duties ranging from 35 to 75 percent. Pakistan has very few trade agreements. The exceptions are agreements with China, Malaysia, and Sri Lanka.

The Ministry of Commerce published a new [Import Policy Order](#) on April 22, 2022, which details import requirements.

**Institutional Mapping:**

In Pakistan, controls are organized on the basis of commodity groups (such as plant or livestock) reflecting functions of government departments (Table 1). There are several different federal ministries and bodies concerned. Corresponding legislation is largely linked to the responsibilities of the organization.

**Table 1: Ministries and Institutions Concerned with Food Safety in Pakistan**

Organizations	Main Areas of Responsibility
<b>1. Ministry of National Food Security and Research:</b>	
Animal Husbandry Commissioner	Chief Veterinary Officer, disease surveillance and control; epidemiology, drugs and vaccines and dairy sector
Animal Quarantine Department	Animal health conditions for import and export; meat inspection for exported meat/casings. Controls at border inspection posts. Under Animal Quarantine (Import and Export of Animal Products Ordinance, 1979)

<b>Organizations</b>	<b>Main Areas of Responsibility</b>
National Veterinary Laboratory	Disease surveillance; veterinary drug testing; vaccination quality and residue testing
Department of Plant Protection	Import/export controls at 26 border inspection posts for plant pests/diseases. Operates under Plant Quarantine Act 1976. Responsible for authorization of pesticides (Pesticide Ordinance 1971)
Grain Quality Testing Laboratory	Sampling and testing for import and export of grains (and other foods); pesticide residue and aflatoxin testing
<b>2. Ministry of Science and Technology:</b>	
Pakistan Standards and Quality Control Authority	The Pakistan Standards and Quality Control Authority, under the Ministry of Science and Technology, is the national standardization body. It is responsible for enforcement of standards and to inspect and test products and services, including food items, for their quality, specification and characteristics during use, and for import and export purposes.
<b>3. Ministry of Health:</b>	
National Institute of Health	Communication with provinces on food safety
<b>4. Ministry of Commerce:</b>	
The Customs Department	Its primary function is to ensure that imported foods meet Pakistan's labeling and shelf-life requirements, are not on the list of banned items, and are assessed the appropriate tariffs.
<b>5. Provincial Governments:</b>	
Provincial Food Authorities	Enforcement of food safety and quality standards.
Department of Health	Food safety in retail/catering and processing establishments for national market.
Department of Plant	Plant pest and disease surveillance; control on use and distribution



<b>Organizations</b>	<b>Main Areas of Responsibility</b>
Protection	of pesticides
Livestock/Dairy Departments	Meat and dairy inspection at farm/ slaughterhouse/ dairy; poultry and eggs inspection at producer level
<b>6. Other Institutions:</b>	
Pakistan Council of Scientific and Industrial Research (PCSIR)	Analytical and Testing Services for importers and exporters; Quality Control Services Biotechnology, Food Technology and Fermentation
Pakistan Agriculture Research Council (PARC)	Pesticide residue and aflatoxin testing, any other plant, seed and animal related testing
Pakistan Council for Research in Water Resources (PCRWR)	Water and related testing
Consumer Rights Commission of Pakistan (CRCP)	It is the first national consumer organization in the country, which approaches the issue of consumer protection in comprehensive and holistic terms. Its vision and strategies have significant cross linkages with both market practices and issues of governance.

## **Section II. Food Additive Regulations:**

The government of Pakistan has adopted the Codex list/standards for food additives. PSQCA is the agency with the mandate on this subject. Pakistan also follows Codex standards regarding vitamins in food products.

The MOC regulates the importation of food coloring. These regulations are reviewed and updated annually. The importation of food coloring or foods containing artificial colors is subject to the following conditions:

The importer must obtain a certificate from the relevant agency of the exporting country's government. The certificate shall accompany each consignment and shall state that the food additives/colors are in use in the country of origin at the time of shipment or are registered for use in that country.

The exporter's invoice must show the percentage of dye content in the product.

### **Section III. Pesticides and Other Contaminants:**

Pakistan generally follows Codex rules and guidelines on maximum residue limits (MRLs) of pesticides and other contaminants in foodstuffs. Customs officials enforce these rules according to Codex-defined limits for imported foods. However, Pakistan does not have a system to enforce the MRLs of pesticides and other contaminants in domestically produced foods.

Occasionally, authorities enact special requirements to deal with a specific issue in an exporting country. The Department of Plant Protection regulates the registration of pesticides. All pesticides must be registered by filing an application with the Department.

### **Section IV. Packaging and Container Regulations:**

There are no special packaging or container size requirements. Pakistan generally follows Codex rules for packaging requirements, and generally accepts packaging material if allowed in the exporting country. Most foodstuffs are imported in consumer-ready packaging. Pakistan generally accepts imported food as packaged in the exporting country. A notable exception, however, is food packaging for vegetable oil. Pakistan requires refined vegetable oil to be imported in bulk for re-packaging, a requirement aimed at encouraging local packaging and saving foreign exchange. Pakistan does not have any packaging requirements related to environmental concerns, such as waste disposal or recycling.

Pakistan requires that commercial invoices and packing lists be included inside each shipping container. The following information must be placed in a durable and legible manner on all packages in the consignment or container:

- name of the product;
- name and address of the manufacturer;
- net contents;
- date of manufacture and date of expiration;
- percentage of dye contents; and
- normal storage stability

### **Section V. Labeling Requirements:**

On July 1, 2019, the MOC implemented requirements stipulated in Statutory Regulatory Order (SRO) 237 for all imported consumer food and beverage products. The standards were intended to improve food safety and consumer education.

The regulations require all imported consumer-packaged food and beverage products to abide by the following:

- The accreditation authority of the country that validates the Halal Certificate or Halal Certificate issuing authority needs to be a member of either the Standard Metrology Institute for Islamic Countries (SMIIC) or the International Halal Accreditation Forum (IHAF), or else the Halal Certificate unacceptable.
- All consumer food and beverage imports must have 50% of the shelf life remaining, from the date of filing the Import General Manifest (IGM), and 66% of the shelf life remaining from the date of manufacturing.
- Labeling of nutritional values and usage instructions must be in Urdu and English language.
- All products (case packaging and the contents of the case) must have a halal logo.
- Sticker labels are not permitted.
- Urdu labelling is not required for bulk-packaged industrial products.

U.S. manufacturers and exporters are encouraged to work closely with their importers to ensure that their labels meet Pakistan's requirements at the time of import.

**General Requirements:**

1. Labels in English or Urdu languages are required.
2. Packages or containers must also indicate:
  - a. the date of manufacture and date of expiration;
  - b. that the contents are free from pork and pork products;
  - c. that the contents are fit for human consumption and that any animal product was obtained from an animal slaughtered according to Halal requirements;
  - d. that import of edible oils is on the basis of landed weight and landed quality; and
  - e. that packing may not contain any word or inscription of a religious connotation or any obscene picture that may offend the religious feeling of any sect, class, or group in Pakistan.
3. The production and expiration dates must be printed in English, using either words and/or numbers.
4. Standard U.S. bar-code labels alone are generally not acceptable as they lack printed production and expiration dates, as required by law.
5. Stickers, which contain the required printed dates of manufacture and expiration, should be affixed to the standard U.S. labels prior to shipment. Dates may also be printed on the labels in day/month/year format.

6. Products for institutional sale are governed by the same regulations as products for direct retail sale. However, certain institutions may request additional information on the label to identify it as their product.

7. Samples are governed by the same regulations as products for direct retail sale.

8. The coded "best before use date" is not considered to be an acceptable expiration date. In the past, several cargoes containing items without printed production and/or expiration dates, shipments were held by Customs until stickers with production and expiration dates certified by the Pakistani High Commission in the United States could be affixed to each individual item.

9. Pakistan does not have any special or additional requirements based on the country of origin for any food product. In the event that there is a worldwide alert for a product from a particular origin, Pakistan will notify the appropriate country and trade organizations of any changes in its import requirements.

10. Authorities strictly enforce label requirements and do not grant exceptions. They are authorized to reject or to destroy any cargo with improper labels.

11. In the case of food items containing artificial flavoring substances, the label may not declare the chemical names of the flavors, but in the case of natural flavoring substances or nature-identical flavoring substances, the common name of flavors, including whether natural or synthetic, shall be mentioned on the label.

#### **Requirements Specific to Nutritional Labeling:**

Pakistan does not require nutritional content to be listed on product labels but generally accepts US FDA regulations as guidelines. PSQCA regularly update its guidelines, based on Codex and US FDA revisions.

1. Nutritional labels are not required but can be included at the option of the supplier.

2. The standard U.S. nutritional fact panel is acceptable if it conforms to US FDA regulations.

3. There are no regulatory restrictions on the importation of products with nutrient or nutritional claims. Pakistani authorities consider claims largely as promotional tools and thus far, do not require them to be based on scientific evidence.

4. There are no regulatory restrictions on the importation of products with implied claims. Here again, authorities consider these claims to be promotional tools and do not require them to be verified with scientific evidence.

5. Authorities generally have no objection to the importation of products with specific health claims. However, if a product claims to be a source of vitamins or minerals, it must be registered with the federal government prior to arrival, jointly in the name of importer and manufacturer.

6. The Punjab Food Authority (PFA) has banned use of word “energy drink” for caffeinated drinks. The authority has directed that the word “stimulant” be used instead of “energy” and to label products in Urdu and English language only. Companies must indicate on their products that energy drinks are not suitable for pregnant women and children younger than 12 years of age. PFA has directed companies to use caffeine quantity in their products of less than 200ppm or 200mg/l and to avoid using pharmaceutical ingredients during the preparation of these beverages.

#### **Section VI. Other Regulations and Requirements:**

Pakistan requires food imports to be accompanied by a written certification from the producer and exporting country that the products have been produced under sanitary conditions and in disease free areas. The certificate is a federal requirement. The MOC is the agency responsible for governing imports and exports across national borders, undertaking multilateral trade negotiations, and formulating and implementing trade policy. All imports into Pakistan are governed by the Import Policy Order issued by the MOC.

The importer shall ensure that:

- importation is in accordance with regulations and the item(s) are not on the negative list;
- the terms and conditions of importation are specified in the letter of credit;
- imports of plants and animals have the necessary approval from MNFSR; and
- imports of livestock genetics must have the necessary clearance from MNFSR.

Laboratory testing may be required for food products containing medicines.

Bulk vegetable oils are the only food products subject to random testing to ensure fitness for human consumption at time of arrival.

Samples: Product samples can be shipped via express mail or parcel post. If a sample meets labeling and other requirements, it will be released after the applicable tariffs and taxes are paid. Free samples are assessed a duty based on freight costs. Specific requirements for sample shipments may be obtained from the MOC.

#### **Specific Documentation and Certification Requirements:**

The exporter must provide a certificate of origin for all shipments. For animal products and products containing animal products, the exporter also must certify that the product is "Halal." Pakistan may require other specific certificates based on worldwide alerts or other emergency situations. In such instances, the Government of Pakistan will alert the appropriate countries and trade organizations of these requirements. Exporters should verify with their importers that all required certificates for customs and quarantine clearance have been obtained prior to shipment. Exporters should also refer to the 2023 FAIRS Export Certificate report for Pakistan for further information.

The following documents are generally required for import into Pakistan:

- a National Tax Number (NTN) certificate issued by the Federal Board of Revenue (FBR) on filing of application form accompanied with one attested copy of National Identity Card of the importer;
- a Pakistani bank account;
- a Sales Tax Registration. For registration, an importer must send Form ST-1 to their local sales tax registration office via post. The local registration office transmits applications to the Central Registration Office in FBR Islamabad. Pakistan eliminated previous requirements of furnishing supporting documents now that the Central Registration has online access to the NTN database. On verification, Central Registration generates and issues a registration certificate to the applicant directly; and
- a membership certificate of Chamber of Commerce and Industries or any relevant trade association of Pakistan.

#### **Section VII. Other Specific Standards:**

Pakistan generally follows European standards for weights and measurements. U.S. weights and measures are also acceptable. Other standards applied by product include:

- Codex rules to regulate importation of vitamin-enriched products;
- food products containing a genetically enhanced component are not restricted;
- fresh or frozen seafood may be imported in consumer packs or in bulk, provided the sale of the same product is permitted in the country of origin;
- for live animal shipments, the importer must provide a quarantine certificate from the relevant authority in the country of origin, which contains all the information required for quarantine clearance;
- alcoholic beverages may not be imported for commercial sale. Importation of alcohol for other than commercial sale requires approval of the MOC;
- organic foods and health foods are not regulated. However, exporters may use US FDA and Codex rules as a general guideline; and
- product samples and free samples must follow the same regulations as commercially imported items.

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

The Plant Breeder's Right Act has been promulgated after approval by the parliament, although implementing rules are still being framed. The Act will provide intellectual property protection for plant technologies. This will be the first-ever intellectual property protection for crops in Pakistan. MNFSR will administer the regulation.

A copyright on a registered design is initially granted for five years, extendable for another ten years. Patents are granted for up to 16 years from the date of application and may generally be extended for another five-year period and, under some circumstances, for an additional five years. Trademarks and brand names are protected under domestic laws and are registered through the Intellectual Property Organization. Trademarks are registered under the 2001 Trademarks Ordinance through the Trademark Registry, a department in the MOC. Trademarks are registered for a 10-year period from the date of registration and may be renewed for a further 10 years. The importer of a food product, in coordination with the manufacturer, may register the trademark(s) and brand(s). Pakistan is also a member of the Universal Copyright and Bern Conventions.

### **Section IX. Import Procedures:**

All imports into Pakistan are governed by the Import Policy Order issued by the MOC. Pakistan also maintains a list of several hundred “regulatory duties” that are imposed periodically with the consensus of the senior Economic Coordination Committee. These “duties” are applied in addition to any previously existing tariffs or other import-related fees. The regulatory duties are principally to reduce the flow of imports or to raise revenue for the government. While the duties have not historically exceeded bound rates, the sudden and unanticipated changes in the tariff structure can affect market access for U.S. goods and create an uncertain business environment. Over the past few years, regulatory duties for wheat, sugar, powdered milk, and shelled almonds have been implemented or increased in order to protect farmers or raise revenue. Currently, there are regulatory duties on an estimated 200 agricultural products.

Pakistan has removed the registration requirement for importing firms in the private sector. Importers are required to obtain special authorization from the MOC to import items on the negative/restricted list. They must ensure that the correct Harmonized Schedule code number for every imported item is stated in the import documents. The requisite import documents include bills of lading, invoices, packing lists, certificates of origin, copies of letters of credit and insurance certificates.

Ample public and bonded warehouse facilities, most of which are owned by the port trust organizations, exist for the storage of goods. Goods must be landed within the period specified on the bill of lading or within 15 days after entry of the vessel into port. Once the goods have entered and duties have been assessed, the importer must clear them for consumption (by paying all duties) or warehouse them.

Customs and Plant Protection and Quarantine (PPQ) officials inspect imported products to ensure they conform to labeling and other import requirements. Imports of live animals or plants require necessary certification from the country of origin. A no objection certificate (NOC) from MNFSR is required for the import of semen, embryo, and live animals. After Customs and PPQ issue their respective clearance reports, the goods are released on payment of import duty.

English is the official language. All agencies will accept documents in English and will respond in English. Thus, there is no need to translate documents to Urdu or other local languages to expedite procedures, unless specified under Pakistan laws. Goods generally can be cleared through Customs in less than a week, if all papers are in order. The system allows for appeal (at multiple levels) in case of a dispute.

Imports of goods into Pakistan generally require a compulsory letter of credit. Revolving, transferable, and packing letters of credit are not permissible. Letters of credit should provide for negotiation of documents within a period not exceeding 30 days from the date of shipment. Pakistan uses the Harmonized System to classify and describe goods. Customs duties are levied on an ad valorem basis.

## **Section X. Trade Facilitation:**

### **Advance Ruling:**

At present, Pakistan is not issuing advance rulings, but the goal is to start using the system of advance rulings in the near future. As a first step, on October 5, 2020, Customs notified the rules for Advance Ruling, but the system is not in place to implement these rules. Once implemented, the rules will cover all imported goods including agricultural commodities.

### **Pre Clearance Program:**

There are no pre clearance programs currently in place for food and agricultural products. At present all products must be cleared at the port of entry and all original documents be submitted to the customs and quarantine authorities. Import requirements and requisite documents are mentioned in the 'Import Procedure' sections. Import of all agricultural commodities is subject to issuance of a pre-importation 'import permit' by the Department of Plant Protection (DPP), Ministry of National Food Security & Research.

### **Use of Electronic Certificates:**

As of now, DPP, the official quarantine authority, is working on a manual paper-based environment with limited integration with the customs department. Customs has recently started some digitalization initiatives, but it is not fully operational. Under the Pakistan Single Window (PSW) initiative, the department will be fully digitized allowing DPP to process and issue certificates electronically. Certificates from the exporting country will be scanned and uploaded in the system. Once the PSW system matures, there are plans to develop functionality for receipt of electronic certificates from abroad. Although the Government of Pakistan intends to make this system functional, but industry sources indicate that it may take considerable time for the system to be developed and made functional.

### **Fees at Ports:**

All imports at the ports are subject to import duty and taxes as per Pakistan Customs Tariff and other tax laws and service charges to Customs and the DPP. Pakistan also maintains a list of 'regulatory duties' that are imposed periodically with the consensus of the senior Economic Coordination Committee. These duties and taxes vary from product to product. In addition, importers are required to pay commercial fees and charges to various service providers. The customs duties must be paid upon import of a product pursuant to the appropriate tariff classification.

Additional information on tariffs can be obtained at:

<https://fbr.gov.pk/categ/customs-tariff/51149/70853/131188>



### **Common Delays:**

Although Pakistan is a signatory of the World Trade Organization's (WTO) Trade Facilitation Agreement, an initiative aimed at reducing delays in the movement of goods across the borders, there are still bureaucratic hurdles that cause delays in clearance. Most delays are attributed to slow port clearances due to lack of coordination between Customs and other government departments that exercise jurisdiction over agricultural commodities. The consignment may remain stranded at the port for days waiting for a DPP release order. Moreover, the absence of a joint inspection system can lead to multiple examinations of the same container by Customs, DPP and other government agencies (e.g., the Federal Seed Certification & Registration Department). This further adds to delays and leads to demurrage charges, thereby increasing the cost of imports.

Manual processing of import permits and release orders are another common reason of delays in the importation of agricultural commodities. DPP in particular is understaffed and struggles to cope with the workload. Shipment release times are dependent on how long it takes for the importer to pay all duties and taxes. Incomplete or incorrect certification also generally leads to delays in the clearance of goods. Goods generally can be cleared through Customs in less than a week, if all papers are in order. The system allows for appeal (at multiple levels) in case of a dispute.

Some U.S. companies have reported being adversely affected by Customs Rules 389 and 391. Rule 389 requires the placement of a physical invoice and packing list in the shipping container, while Rule 391 places the responsibility of including such documents, and liability for failure to comply, on the owner of the goods and the carrier.

### **Duplicative Inspections:**

Customs, DPP, and the Federal Seed Certification & Registration Department often conduct multiple examinations of the same consignment for sample taking. Customs plans to introduce a system of joint inspections at the ports, but it will still take considerable time to implement this system.

### **Appendix I. Government Regulatory Agency Contacts:**

Secretary

Ministry of National Food Security and Research

Government of Pakistan

Pak. Secretariat, Block "B"

Islamabad, Pakistan

Tel # (92-51) 920-3307

Fax # (92-51) 921-0616

email: [secretarymnfsr@yahoo.com](mailto:secretarymnfsr@yahoo.com)

Secretary

Ministry of Commerce

Government of Pakistan

Pak. Secretariat, Block "A"

Islamabad, Pakistan

Tel # (92-51) 921-0277

Fax # (92-51) 920-3104

email: [mincom@commerce.gov.pk](mailto:mincom@commerce.gov.pk)

Secretary

Ministry of Industries

Government of Pakistan  
Pak. Secretariat, Block "A"  
Islamabad, Pakistan

Tel # (92-51) 921-1709  
Fax # (92-51) 920-5130  
email: [moip@moip.gov.pk](mailto:moip@moip.gov.pk)

Secretary  
Ministry of Finance  
Government of Pakistan  
Pak. Secretariat, Block "Q"  
Islamabad, Pakistan

Tel # (92-51) 920-6382  
Fax # (92-51) 921-8062  
email: [so\\_coord1@finance.gov.pk](mailto:so_coord1@finance.gov.pk)

Director General  
Pakistan Halal Authority  
Plot No. 25, H-9/1 Islamabad  
Pakistan

Tel # (92-51) 9265421  
email: [dgpakistanhalalauthority@gmail.com](mailto:dgpakistanhalalauthority@gmail.com)

## **Appendix II. Other Import Specialist Contacts:**

Chairman  
Central Board of Revenue  
CBR House  
Islamabad, Pakistan

Tel # (92-51) 920-1938  
Fax # (92-51) 920-5308  
email: [chairman@cbr.gov.pk](mailto:chairman@cbr.gov.pk)

Chairman  
Export Promotion Bureau  
Finance and Trade Center  
Shara-e- Faisal, Karachi, Pakistan

Tel # (92-21) 920-6487  
Fax # (92-21) 920-2713  
email: [chairmanepb@yahoo.com](mailto:chairmanepb@yahoo.com)

Pakistan Standards and Quality  
Control Authority  
Karachi, Pakistan

Tel # (92-21) 340-21426  
Fax # (92-21) 21-340-23843  
email: [directorwto@psqca.com.pk](mailto:directorwto@psqca.com.pk)

Deputy Director  
Agri and Food Safety Division  
Pakistan Standards and Quality  
Control Authority  
Karachi, Pakistan

Tel # (92-21) 99261843  
email: [naseem.sami@yahoo.com](mailto:naseem.sami@yahoo.com)

Trade Development Authority

Tele # (+92)-2199206462, (+92)-2199202719

3rd Floor, Block A, Finance & Trade Fax # (+92)-2199206461  
P.O. Box No. 1293, Shahrah-e-Faisal  
email: [ce.secretariat@tdap.gov.pk](mailto:ce.secretariat@tdap.gov.pk)  
Karachi

**Attachments:**

No Attachments