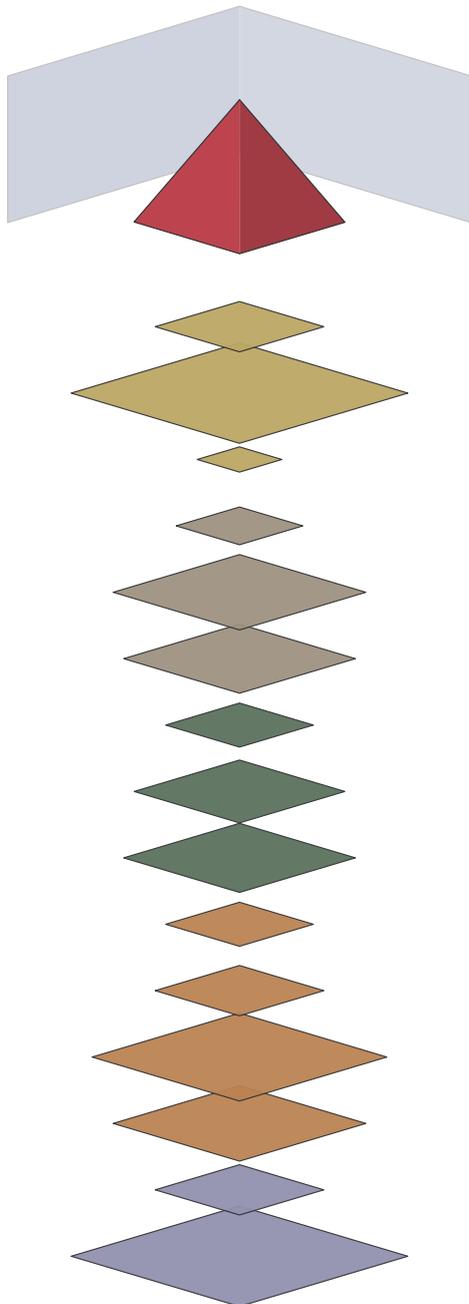




# TUNISIA



## 4.45 CRIMINALITY SCORE

41<sup>st</sup> of 54 African countries  
5<sup>th</sup> of 6 North African countries



### CRIMINAL MARKETS **5**

HUMAN TRAFFICKING	4
HUMAN SMUGGLING	8
EXTORTION & PROTECTION RACKETEERING	2
ARMS TRAFFICKING	3
TRADE IN COUNTERFEIT GOODS	6
ILLICIT TRADE IN EXCISABLE GOODS	5.5
FLORA CRIMES	3.5
FAUNA CRIMES	5
NON-RENEWABLE RESOURCE CRIMES	5.5
HEROIN TRADE	3.5
COCAINE TRADE	4
CANNABIS TRADE	7
SYNTHETIC DRUG TRADE	6
CYBER-DEPENDENT CRIMES	4
FINANCIAL CRIMES	8



### CRIMINAL ACTORS **3.9**

MAFIA-STYLE GROUPS	1.5
CRIMINAL NETWORKS	4.5
STATE-EMBEDDED ACTORS	6.5
FOREIGN ACTORS	2.5
PRIVATE SECTOR ACTORS	2.5

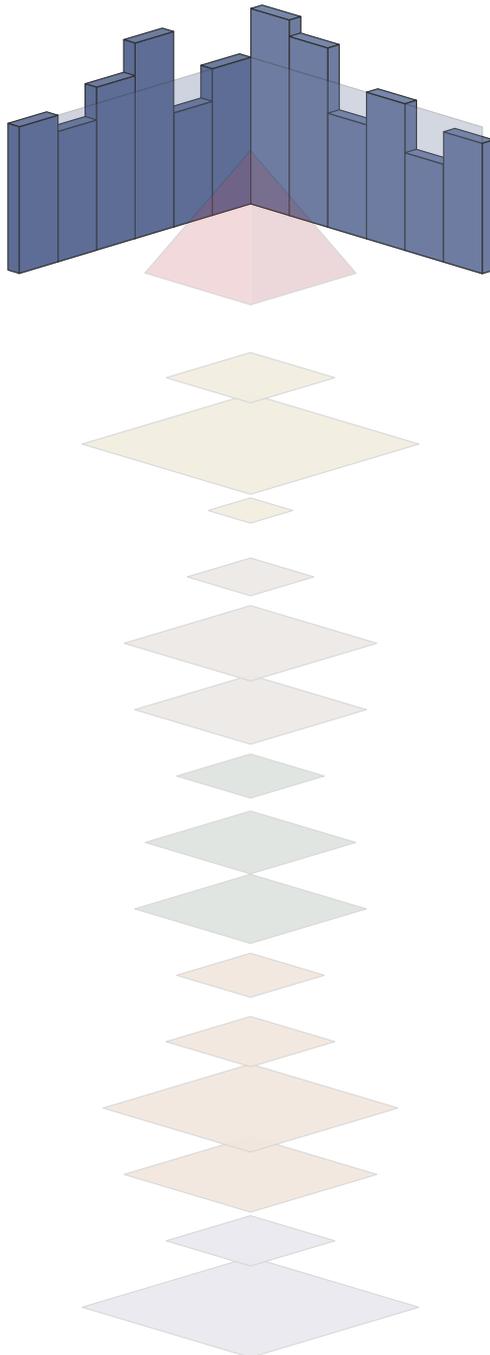


## 4.5 RESILIENCE SCORE





# TUNISIA



4.5

## RESILIENCE SCORE

19<sup>th</sup> of 54 African countries

2<sup>nd</sup> of 6 North African countries

POLITICAL LEADERSHIP AND GOVERNANCE	4.5
GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY	4
INTERNATIONAL COOPERATION	5
NATIONAL POLICIES AND LAWS	6
JUDICIAL SYSTEM AND DETENTION	3.5
LAW ENFORCEMENT	4.5
TERRITORIAL INTEGRITY	6
ANTI-MONEY LAUNDERING	5.5
ECONOMIC REGULATORY CAPACITY	3.5
VICTIM AND WITNESS SUPPORT	4.5
PREVENTION	3
NON-STATE ACTORS	4



4.45

## CRIMINALITY SCORE



CRIMINAL MARKETS

5



CRIMINAL ACTORS

3.9



# CRIMINALITY

## Criminal Markets

### PEOPLE

The human trafficking market in Tunisia is not as sizeable as in other countries in North Africa, but it is still a concern. Several cases of trafficking involve sub-Saharan African women being exploited for domestic servitude and in the nightclub industry. Men from West Africa are mainly trafficked for labour exploitation purposes. However, Tunisian nationals also account for a significant share of victims of human trafficking. In 2021, more than half the victims identified by the authorities were women and children. It is expected that this criminal market will increase in size to the rise of human smuggling, as these crimes often overlap.

Tunisia is both a source country for migrants and an increasingly important transit zone for individuals moving from Africa to Europe, with Italy being the primary destination. The number of Tunisians crossing the Mediterranean has increased sharply since the COVID-19 pandemic. There has also been a dramatic increase in the number of foreign migrants embarking from the country during the same time period, cementing Tunisia as a key transit country for irregular migration in the region. Rising migration has relied in part on human smuggling networks, which exist all along the Tunisian coast. It has also fueled a rise in self-smuggling, where migrants pool funds to purchase equipment and depart autonomously.

While extortion and protection racketeering are generally minimal in the country, small-scale activities of this nature do take place in irregular car parking lots. Individuals often work in networks to collect parking fees, controlling select areas or working in areas where there are mass events, suggesting that the vehicles of those who refuse to pay might be damaged.

### TRADE

While arms trafficking remains an issue in Tunisia it is not as widespread as other forms of illicit trafficking. Some networks that smuggle firearms into the country store them in deserted places. While some smuggled weapons have allegedly been used in terrorist attacks, most have been sold on to hunters or residents of rural areas.

Counterfeit goods such as clothing, toys, perfume and cosmetics are prevalent and are often sold by street vendors or in shops. Economic difficulties have led to an increased demand for these goods, with most Tunisians preferring to buy counterfeit products, which has had a negative impact on formal trade. There is also illicit trade in excise goods, such as cigarettes and alcohol. The alcoholic beverage market is rife with illegal activity, including illegal imports to avoid taxes. It is difficult to obtain retail licences for the sale of alcohol and the complex regulatory process has led to low- and mid-level police officers abusing their powers. Tunisia is also a destination country for illicit cigarettes, with high local demand stemmed by the price differences. Authorities are working to crack down on contraband goods, including cigarettes and alcohol, and goods have been seized in various parts of the country. However, political leaders are reluctant to streamline the application processes for alcohol retail licences because of various factors, including the monopoly of certain companies in this sector. These conditions may favour the expansion of the black market in alcohol unless significant steps are taken to address them.

### ENVIRONMENT

The illegal flora market in Tunisia is growing, with reports of illegal logging of Algerian oak trees to produce charcoal prevalent in the north-western Ain Drahem region. The recent clearing of eucalyptus trees for the Bouhartma Dam in Jendouba, overseen by a contractor operating illegally in the area, has contributed to the destruction of old-growth forests and there have been reports of locals logging cedar and fir illegally in the Rif Mountains of the Maghreb countries. Corrupt forestry officers and the economic toll exacted by the COVID-19 restrictions have facilitated this practice. Wildfires have further exacerbated the problem, with almost all of them attributed to human recklessness and intentional criminal activity.

The illegal trade in wild animals remains a significant issue in Tunisia, particularly in the southern desert regions, where wealthy Gulf Arabs engage in indiscriminate hunting. The animals are smuggled illegally through regulated export chains and sold at high prices in international markets. Environmental associations have raised concerns about the hunting of endangered animal species such as houbara and deer during legal hunting seasons. There is also irregular, unreported and



unregulated fishing in the country's territorial waters, but the levels have remained steady in recent years.

In relation to non-renewable resources, there has been a gradual increase in fuel smuggling from Algeria and Libya since 2011, and copper theft is prevalent, with perpetrators often acting in organized groups. Theft of copper wire from public infrastructure frequently results in public lighting, telephones and internet services being unavailable for extended periods.

## DRUGS

Heroin smuggling has increased in Tunisia. Most of this is believed to be smuggled into the country by passengers on commercial aircraft or ferries. It largely caters to domestic consumers in coastal urban areas. However, a cluster of arrests in the interior governorate of Gafsa suggests that heroin use may also be an issue in rural areas. Similarly, the cocaine trade has also expanded. Seizures of the drug have been made at seaports, airports, along the Algerian border and in Tunisia's offshore waters. While some cocaine is smuggled into the country from Europe, destined for Tunisia's domestic market, another set of flows, intended for onward smuggling to Europe, arrive in Tunisia from other Maghreb countries and potentially South America. In terms of consumption, Tunisia has seen a rise in cocaine usage, although it remains a relatively expensive and uncommon drug.

The trade in cannabis and synthetic drugs are also widespread and on the rise, having a significant negative impact on Tunisian society. Cannabis is the most widely consumed drug in the country and its affordability and accessibility have led to an increase in consumption, particularly among middle- and high-school students. Customs services at Tunis-Carthage Airport and along the country's land borders have thwarted a number of attempts to smuggle drugs into the country, including cannabis hidden in bags of candy and in a heavy truck with a Tunisian license plate. While strict laws against drug possession have contributed to a dramatic increase in the incarceration of first-time offenders, calls to abolish the law have gained significant traction.

Synthetic drugs continue to be smuggled into Tunisia from Europe and neighbouring countries through different routes. There is also some smuggling of synthetic drugs, Pregabalin in particular, into Algeria and Libya. Generally, these synthetics are procured from hospitals or pharmacies, before being smuggled out of the country via small networks. Ecstasy, previously predominantly consumed by wealthy youths, has become more accessible and its use has spread to low-income neighbourhoods.

Authorities have seized large numbers of ecstasy pills and Pregabalin hidden in cars and luggage. The use of subutex, a semi-synthetic opioid, and lysergic acid diethylamide are also on the rise in the country, often smuggled in by Tunisian nationals. Tunisia's dynamic tourism industry provides both a cover and a potential market for such drugs.

## CYBER-DEPENDENT CRIMES

The Tunisian government recognizes the growing risk of cyber-dependent crime and is seeking to enhance international support to combat it. The industrial sector appears to be the primary target of cyber-attacks, with losses estimated at millions of dinars per year. Conversely, the Tunisian financial sector is reportedly better protected against such attacks than the government. Overall, the number of cyber-attacks in Tunisia is increasing exponentially, with traces of state-sponsored attacks targeting the country.

## FINANCIAL CRIMES

Financial crimes such as tax evasion and avoidance, achieved through mis-invoicing and abusive transfer pricing, result in annual losses of over half a billion dollars. Organized financial crimes involving high-level political actors and prominent businesspeople are well documented, with sports-betting rings emerging as a niche for corruption in professional sports leagues. These crimes often have transnational links and involve complex financial schemes. It is essential to pay particular attention to multinational corporations that exploit the tax code in Tunisia to shift profits to tax havens. However, addressing these crimes remains a challenge due to the state's lack of capacity and the low rate of tax audits.

## Criminal Actors

Widespread corruption is facilitated by state-embedded actors, including politicians, bureaucrats, law enforcement officials and judges, who aid or directly engage in criminal activities. Citizens often bribe officials to gain access to public services. There are numerous reports of corruption among customs and police services, which allegedly protect trafficking networks or allow criminal suspects to cross borders. Private sector actors are also involved in criminal activities, particularly in sports betting and money laundering, with some Tunisian businessmen and companies implicated in illegal transactions. Fake recruitment agencies and some private employment companies are involved in trafficking girls, foreign nationals and Tunisian women, who are forced into prostitution.



Several small networks dominate the criminal landscape in the country and are involved in a variety of activities, including human trafficking and the smuggling of counterfeit goods, although organized crime groups engaged in these activities may have different structures and levels of organization. Human trafficking networks are very small-scale and composed of brokers who act as intermediaries and lure foreign or national victims into exploitative situations. The informal trade in goods, on the other hand, is almost inextricably linked to more structured criminal networks and represents a systemic issue with deep economic and social ramifications,

accounting for a significant portion of Tunisia's gross domestic product.

The criminal mafia in Tunisia, which specializes in drug trafficking, robbery, theft and currency smuggling, is generally centered on family-based organization, which exist in various regions of the country. Although there are a few structured networks whose operations may be classified as mafia style, they are limited in number and scope. The presence of foreign actors in Tunisia has been declining in recent years and is currently limited.

# RESILIENCE

## LEADERSHIP AND GOVERNANCE

The lack of governmental stability has led to a loss of faith in state institutions. Moreover, the absence of significant action against corruption, along with the systematic undermining of state institutions, the concentration of power and the erosion of the rule of law since the 2021 coup have caused general disillusionment, even among the current president's allies. While the official discourse often attributes Tunisia's many issues to organized crime, this is largely an exaggeration used to justify problems such as the shortage of food products and other goods, including sugar, rice, bottled water and petroleum derivatives.

Tunisia's accountability systems are inadequate. The new Constitution does not provide for adequate checks and balances, leading to violations of and attacks on constitutional freedoms and rights. Anti-corruption legislation has been weak in the past. In 2021, the National Commission for the Fight against Corruption was shut down by the authorities.

The political instability in the country has had no effect on international cooperation over organized crime. In fact, efforts to cooperate over cybersecurity resilience have increased. However, the Tunisian state still has no clear crime prevention and anti-crime policies to deal with organized crime. Although the law provides for severe penalties for drug trading, the trade has spread remarkably in recent years. The law that criminalizes cannabis, its cultivation, promotion and consumption, has proved ineffective. There are also challenges with the implementation of anti-smuggling and anti-trafficking laws. The government is taking steps to address the

emerging cyber-related crime trend and improve cybersecurity measures, particularly in critical sectors like finance and telecommunications, but while there is a national cybersecurity strategy in place, there is also substantial room for improvement in implementing it.

## CRIMINAL JUSTICE AND SECURITY

The judicial system faces many challenges and limitations, including politicization, lack of independence, understaffing and limited specialized expertise. The dissolution by the president of the Supreme Judicial Council and the creation of a temporary council have raised concerns about his authority to dismiss judges who violate their professional duties, without specifically defining these duties. Civilians, particularly those accused of defaming the army, can be tried in military courts. The president's assumption of new powers has weakened the judiciary, resulting in judges being fired and multiple cases of judicial inquiries initiated under political instructions. The judiciary also lacks funding and human resources and several high-level positions remain vacant. The prison system is dysfunctional.

The Tunisian police force is facing mounting condemnation for its use of violence against protesters and detainees, with reports of physical and moral violations during arrests and interrogations in security and detention centres. Human rights organizations and civil society activists are calling for the police to respect the law and the guarantees given to the accused, including access to medical examination, lawyers and family.



Tunisia has generally been able to control its territory, with strengthened border security and limited reported cases of friction between the army and terrorists. However, some forms of smuggling continue to be tolerated, and corruption of border security officials remains an issue. In terms of cybersecurity, Tunisia has strong legal and technical measures, but weaknesses in organizational matters.

## ECONOMIC AND FINANCIAL ENVIRONMENT

Tunisia has made efforts to combat money laundering and terrorism financing, especially after being blacklisted in 2017, which eventually led to the country being delisted in 2020. While there has been progress in prosecuting entities and individuals suspected of money laundering and terrorist financing, there is still room for improvement. Investigative and prosecutorial efforts have been selective, often ignoring the wealthiest and most powerful actors, unless there is political intervention.

However, the country is currently facing one of its worst economic crises since independence, aggravated by political strife and the COVID-19 pandemic. The informal economy is expanding, while there are few economic opportunities due to high inflation, unemployment, marginalization, regional economic inequality, under development and an absence of effective reforms. The government's inability to access global financial markets and mobilize state resources has exacerbated the situation. Despite improvements in the investment policy frameworks, economic policies have stagnated or declined.

## CIVIL SOCIETY AND SOCIAL PROTECTION

The Tunisian government has made efforts to support victims and prevent human trafficking, but there are still shortcomings in the country's approach. While the government has provided trafficking victims with healthcare and assisted in their repatriation and reintegration, NGOs have reported that the limited number of ministries that can officially identify trafficking victims has slowed the process of victim identification and access to services. In addition, the process of providing exemption from visa penalties for foreign trafficking victims is slow and cumbersome and authorities may have punished some victims for unlawful acts traffickers compelled them to commit.

The government's approach is heavily security focused and there is still work to be done in preventing human trafficking. The National Authority established an evaluation and follow-up unit responsible for treating the root causes of trafficking, disseminating information and preventing child labour and the exploitation of women and children abroad. However, the results of the unit's work are not visible on the ground and the suspension of the independent anti-corruption authority are worrying signs. Moreover, growing hostility towards civil society organizations involved in victim and witness support activities may further undermine the state's capacity to protect victims and whistleblowers.

Press freedom in Tunisia has deteriorated since the 2019 elections, with politicians openly attacking journalists. Although an independent commission supervises audio-visual media, journalists have reportedly faced growing pressure and intimidation from government officials, particularly since the president announced his exceptional powers in July 2021. The virtual boycott by the president and prime minister of local media outlets has greatly curtailed the work of journalists and undermined people's right to access information. Many journalists practise self-censorship to avoid angering the president and his supporters. There has also been institutional hostility to civil society organizations and NGOs, with the government directly accusing those who are funded by international parties of treason and anti-patriotism and using the judiciary to prosecute journalists, activists, lawyers and political figures.

