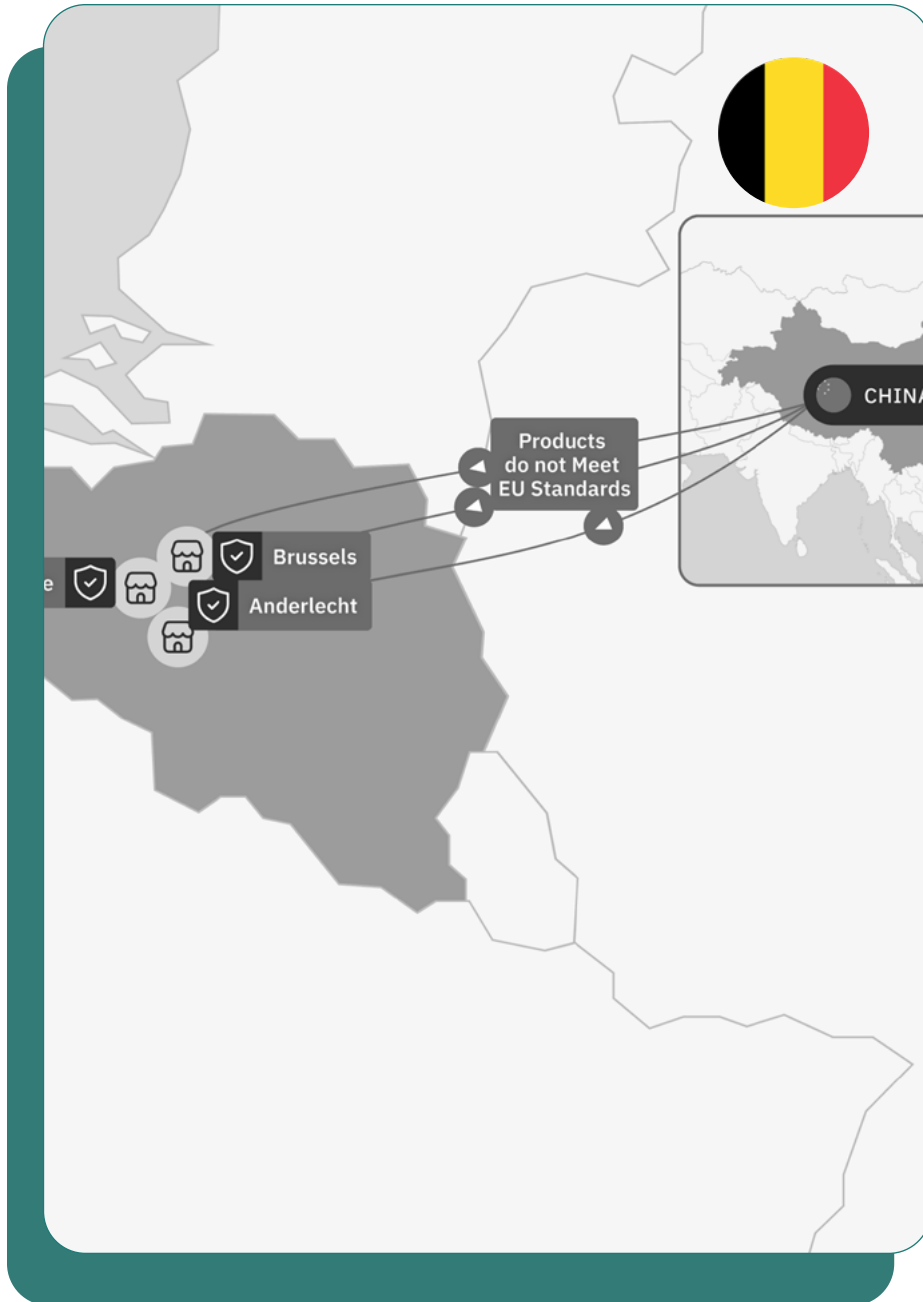


ApiraSol

E-CIGARETTES IN BELGIUM 2024/2025 – Q2

SUPPLY CHAIN INTELLIGENCE
APRIL 2026



Overview

1. INTRODUCTION & METHODOLOGY

2. E-CIGARETTE TRADE - EUROPE

3. E-CIGARETTE TRADE - BELGIUM

1

**INTRODUCTION &
METHODOLOGY**

Introduction

ApiraSol has been investigating the routes, brands, and entities involved in the trade of illicit e-cigarettes across various countries worldwide for several years.

In this particular research conducted in 2025, ApiraSol focused on the global illicit e-cigarette trade, drawing from trade data as well as open sources such as enforcement news, press releases from customs agencies, academic research papers, and online intelligence reports. The period covered for trade data spans January 2024 to December 2024, while enforcement-related news generally covers the years 2024 to 2025.

The Illicit E-Cigarette Trade: A Growing Global Challenge

The illicit e-cigarette trade is becoming a significant force reshaping the global nicotine market, fueled by rapid growth and mounting regulatory complexity. According to Euromonitor International, the illicit e-cigarette market was valued at **USD 47 billion in 2024**, representing over **70% of global spending** and roughly **three-quarters of total volume—equivalent to 605 billion cigarettes**. Furthermore, Euromonitor reported that illicit e-cigarette products exceed **80% penetration in North America, Latin America, the Middle East and Africa, and Asia Pacific**,

while Western Europe, though lower, continues to face persistent illicit trade despite increasing legislative pressures.

Regulatory Frameworks Driving Illicit Trade

Stringent bans and fragmented regulations often unintentionally fuel underground trade. Bans do not necessarily eliminate demand for e-cigarettes; where consumer interest persists despite such measures, gaps in legal supply may arise, creating opportunities for illicit suppliers to fill unmet demand. Even in countries with robust regulatory frameworks, unintended consequences may arise—strict compliance requirements and high taxation can make legal products more expensive and less accessible, while the convenience of illicit channels, including online and delivery-based sources, may further draw consumers toward cheaper, non-compliant alternatives. These conditions typically incentivize smuggling and the use of transshipment hubs in regions with weaker oversight, allowing illicit goods to infiltrate regulated markets.

Complex regulations also often create loopholes that illicit networks exploit, such as mislabeling products or routing shipments through multiple jurisdictions to obscure origins. While strong regulations aim to protect public health, without equally strong

enforcement, these often end up driving demand for illicit products rather than curbing it.

China's Regulatory Gaps and Insufficient Enforcements

China produces the vast majority of e-cigarettes globally, making its regulatory framework critical to controlling illicit trade. The **Administrative Measures for Electronic Cigarettes** (effective May 1, 2022) require that all e-cigarette products comply with mandatory national standards and that producers, exporters, and retailers obtain licenses from the State Tobacco Monopoly Administration (STMA). Similarly, the **Administrative Rules for E-Cigarettes Import-Export Trade** (issued October 2022) stipulate that only licensed exporters can ship products abroad, and exported goods must either meet the destination country's regulations or adhere to China's national standards.

In practice, however, exports are not sufficiently controlled. Loopholes in licensing, weak oversight of small-scale producers, and limited monitoring of export compliance allow unlicensed operators to bypass official channels.

Compounding these issues is weak enforcement in many destination countries. These challenges are amplified by the growing use of digital platforms such as social media, messaging apps, and

informal online channels, which make detection and enforcement even harder.

Without stronger controls and enforcement mechanisms in China, and investment in monitoring capabilities in destination countries, illicit trade will continue to thrive despite regulatory efforts.

On December 18, 2025, China's General Office of the State Council issued a policy document titled "Opinions on Combating Tobacco-Related Illegal Activities Across the Entire Chain", which sets out a comprehensive enforcement strategy against illicit tobacco and nicotine products. The Opinions explicitly bring electronic cigarettes and other nicotine-containing products under strengthened regulatory scrutiny, calling for full-chain enforcement against the illegal production, wholesale, transportation, sale, and "export re-flow" of e-cigarettes and related products. This includes tightening oversight of e-cigarette manufacturing and supply chains, cracking down on unauthorized operations, and treating unlawful export and smuggling back into China as enforcement priorities alongside traditional tobacco smuggling.

The text of the Opinions does not designate exports to overseas destination markets as independent enforcement targets; rather, references to other countries and cross-border cooperation are tied specifically to preventing illegal e-cigarette exports from re-entering China's domestic market. This confirms that the

primary focus is safeguarding China’s domestic regulatory objectives, public health, and market order, with international cooperation positioned mainly as a means to curb the re-flow of illicit products back into China. The effectiveness of China in stepping up its enforcement efforts to control the illicit trade of tobacco and nicotine products remains to be seen.

Amid the alarming surge of illicit market activity and mounting regulatory complexity, ApiraSol’s 2025 investigation into the global e-cigarette trade will map illicit trade flows, analyze seizure patterns across countries and regions, and uncover the mechanisms enabling this shadow economy.

Methodology

This report has been prepared using various data sources, including (but not limited to):

- Publicly available customs trade data for the period January 2024 - December 2024. For those countries covered in this report that don’t make their customs data publicly available, data has been obtained from the mirrored data of other countries.
- Statistical data for the period January 2024 - June 2025.
- News articles relating to enforcement and seizures.

Terminology and Definitions

Statistical Data - Numerical information representing measurable aspects of economic, demographic, social, or environmental phenomena, as produced by national statistical offices, government agencies, or intergovernmental organizations.

Trade Data - Information on the movement of goods and services between countries, typically reported by customs authorities and presented in terms of import and export volumes, values, origin, and destination.

Enforcement News - Reports and updates issued by law enforcement, customs, or regulatory agencies on activities such as investigations, product seizures, arrests, policy actions, and other official measures.

In the trade data, Origin and Destination Countries refer to the following:

Origin Countries - Shipment Origin Countries declared in publicly available trade data between January 2024 - June 2025.

Destination Countries - Shipment Destination Countries declared in publicly available trade data between January 2024 - June 2025.

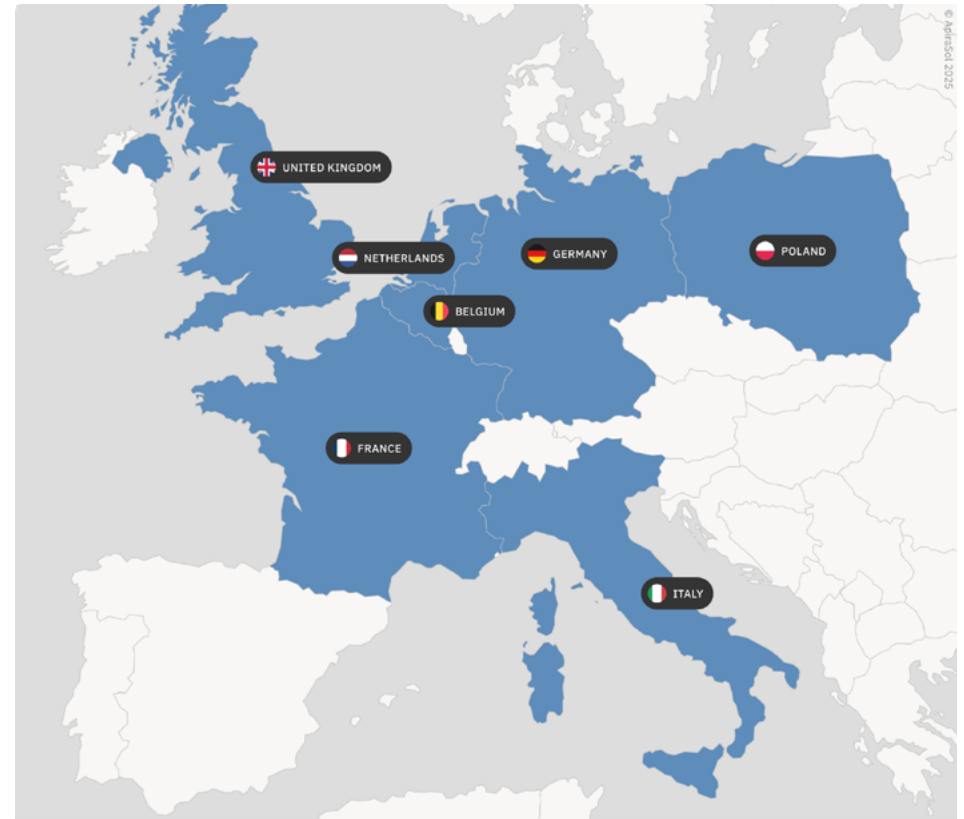
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**E-CIGARETTE
TRADE - EUROPE**

E-Cigarette Trade - Europe

This report examines the trade of e-cigarettes in **Belgium**.

E-cigarette regulations across Europe are among the most structured globally, largely harmonized under the **EU Tobacco Products Directive (TPD)**. Countries such as **Belgium, France, Germany, Italy, Netherlands, and Poland** enforce common standards: nicotine limits (20 mg/mL), size restrictions for refill containers and tanks, child-resistant packaging, health warnings, and strict advertising bans. Several European countries—such as Finland, Denmark, Estonia, Lithuania, Hungary, Slovenia, and Latvia—have gone further by banning non-tobacco flavors to curb youth appeal. While the United Kingdom, post-Brexit, maintains similar rules under domestic law. Based on reported exports, the **UK, Italy, Netherlands, and Poland** show a significant gap between China's e-cigarette export figures and their declared imports, often amounting to millions of dollars. This discrepancy suggests substantial illicit flows into these markets, where demand persists despite strict regulations. In contrast, **Belgium, France, and Germany** report higher declared imports than China's export data, indicating these countries may serve as supply hubs for re-export or informal redistribution to neighboring markets.



European countries generally have lower illicit incidence compared to other regions, with the UK at just over 20% and Poland over 40%, based on Euromonitor estimates. European authorities have intensified crackdowns on illicit e-cigarette trade, uncovering large-scale smuggling operations across multiple countries. Seizures in **Germany, the UK, Belgium, Poland, Italy**, and the **Netherlands** reveal hundreds of thousands of illegal e-cigarettes, mostly originating from China. Common tactics include misdeclaring shipments, concealing products among legitimate goods, disguising them as toys or cosmetics, and routing through logistics hubs like the Netherlands. Distribution often relies on informal retail networks and online platforms, highlighting the role of organized smuggling groups and transnational supply chains in sustaining illicit flows.

3

E-CIGARETTE TRADE -
BELGIUM

Summary

China's declared e-cigarette exports to Belgium in 2024 totaled USD 98,794,000, while Belgium's declared imports from China reached USD 161,431,000, resulting in a negative statistical gap of approximately USD 62.6 million where Belgium reports significantly higher trade than China. The following factors provide a structured explanation of possible drivers behind this mirror discrepancy.

- **Regulatory Environment:** Belgium has progressively tightened its regulatory framework for e-cigarettes, introducing excise on e-liquids, strict EU-CEG notification rules, flavour restrictions and a decision to ban disposable e-cigarettes, which increases both the administrative traceability of legal imports and the incentives for circumvention. As a result, Belgium may capture a broader and more precisely classified set of e-cigarette products in its import statistics than appears in China's bilateral export breakdowns.
- **Transshipment and re-routing:** E-cigarettes of Chinese origin often move through intermediary hubs (other EU member states or logistics centres) before arriving in Belgium, with shipping, consolidation and re-invoicing taking place outside the direct China–Belgium lane. Depending on how customs authorities attribute partner countries, Belgium may still report these as “from China” based on origin, while Chinese statistics record exports to the transit state, leading to under-counted direct exports to Belgium in Chinese data.
- **Misdeclaration and evasion:** On both sides, some products may be reported under broader or different HS codes (generic electronics, components, flavouring liquids or other consumer goods) rather than under e-cigarette-specific categories, especially where traders seek to minimise scrutiny or tax exposure. Such misdeclaration and value manipulation can cause China to under-record e-cigarette exports to Belgium under the relevant product lines, while Belgium records a larger share of these items correctly as e-cigarettes.
- **Incomplete or Delayed Reporting:** Some shipments lack complete data—such as shipment weight or transport mode—hampering transparency and granular reconciliation.
- **Customs Data Limitations:** Differences in classification standards, documentation practices, and valuation methods between Belgium and its trading partners exacerbate discrepancies, making reconciliation of bilateral trade figures challenging.
- **Prevalence of Smuggling and Illicit Trade:** Belgium is recognised as a hub for illicit tobacco, and recent operations have uncovered substantial quantities of illegal and non-compliant e-cigarettes and disposable devices, indicating active underground supply chains alongside the legal market. In this context, it is plausible that part of the China–Belgium e-cigarette flow is routed or declared in ways only partially reflected in China's official export figures.

Regulatory Overview

E-cigarettes in Belgium are regulated under national legislation aligned with the EU Tobacco Products Directive, covering their manufacture, importation, sale, advertising, packaging, taxation, and use. The primary legal framework is the Royal Decree of October 28, 2016, which was amended on November 7, 2022 to include stricter provisions, particularly for nicotine-free e-liquids, which are now regulated similarly to nicotine-containing products. Both types must undergo mandatory notification through the EU Common Entry Gate (EU-CEG) system, and only products listed on the positive notification list maintained by the FPS Public Health may be legally marketed.

The law prohibits sales to individuals under 18, bans advertising and sponsorship, and restricts vaping in enclosed public spaces, including workplaces and public transport. As of July 2023, notification fees were increased to €200 per product, and all products must comply with labelling, packaging including health warnings, and safety standards, including those for hazardous substances and electromagnetic compatibility.

Belgium also imposes an excise tax of €0.15 per ml on all e-liquids, regardless of nicotine content. While vending machine sales are banned, online sales (distance selling) are also prohibited under current regulations. Starting January 1, 2025, the sale of disposable e-cigarettes, with or without nicotine, will be banned due to environmental and youth protection concerns.

Statistical Data (China as Origin)

China's declared exports of e-cigarettes to Belgium in 2024 totaled \$98,794,000, while Belgium's declared imports from China reached \$161,431,000—creating a **discrepancy of approximately \$62.6 million**. A negative mirror gap where Belgium reports substantially higher e-cigarette imports from China than China reports as exports to Belgium is consistent with complex routing, re-invoicing and possible misdeclaration patterns associated with both licit and illicit flows. While the discrepancy can be explained by statistical and commercial factors (transshipment, incomplete or delayed reporting, customs data limitations), the documented scale and organisation of Belgium's illicit tobacco and e-cigarette markets make it reasonable to consider illicit trade as one contributing factor when interpreting the China–Belgium e-cigarette gap.

Total Value 2024:

- Total Exports from China 2024: \$98,794,000
- Total Imports from China 2024: \$ 161,431,000
- **Statistical Gap: \$62,637,000**

EXPORTS OF E-CIGARETTES FROM CHINA TO BELGIUM - STATISTICAL DATA (ITC DATABASE)

HS Code	HS Code Description	ORIGIN COUNTRY	DESTINATION COUNTRY	Value in 2024 (Unit : US Dollar thousand)	Value in 2025-Q1 -Q2 (Unit : US Dollar thousand)
24041200	Other products containing nicotine, intended for inhalation without combustion	CHINA	BELGIUM	81,489	28,781
24041990	Other products containing nicotine substitutes, intended for inhalation without combustion	CHINA	BELGIUM	1,218	830
24041910	Other products containing tobacco substitutes, intended for inhalation without combustion	CHINA	BELGIUM	0	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	BELGIUM	16,087	3,014
Total:				98,794	32,625

IMPORTS OF E-CIGARETTES TO BELGIUM FROM CHINA - STATISTICAL DATA (ITC DATABASE)

HS Code	HS Code Description	ORIGIN COUNTRY	DESTINATION COUNTRY	Value in 2024 (Unit : US Dollar thousand)	Value in 2025-Q1 -Q2 (Unit : US Dollar thousand)
24041200	Products containing nicotine, intended for inhalation without combustion (excl. containing . . .	CHINA	BELGIUM	119,319	56,823
24041990	Products containing nicotine substitutes, intended for inhalation without combustion (excl. . . .	CHINA	BELGIUM	7,421	1387
24041910	Products containing tobacco substitutes, intended for inhalation without combustion (excl. . . .	CHINA	BELGIUM	0	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	BELGIUM	34,691	12,693
Total:				161,431	70,903

 **BELGIUM**
STATISTICAL DATA



Exports from China to Belgium

98,794,000

Total 2024 Value (USD)
1H 2025 Value (USD): 32,625,000

Imports to Belgium from China

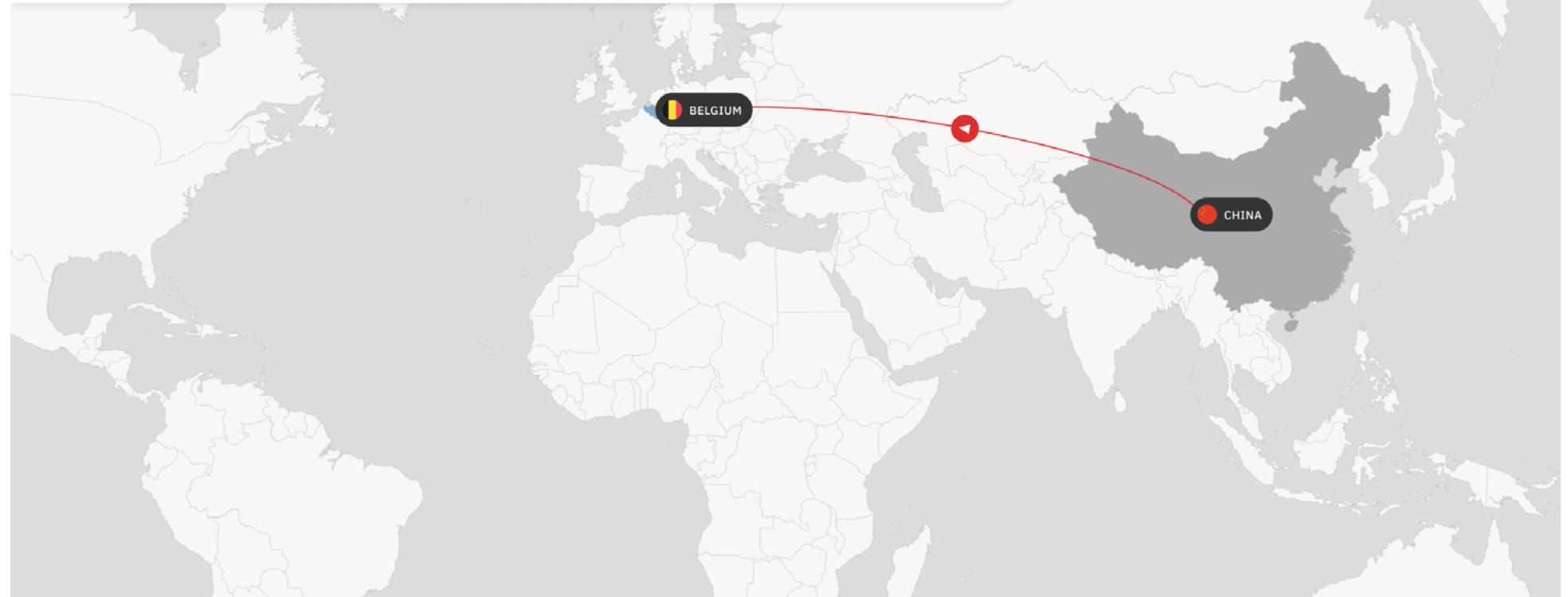
161,431,000

Total 2024 Value (USD)
1H 2025 Value (USD): 70,903,000

Statistical Data Gap *

-62,637,000

* Difference between the Exports and the Declared Imports (USD)



The online articles report on **seizures of illegal e-cigarette products in Belgium.**

Belgian enforcement news on vaping shows a rapid escalation in both regulatory ambition and operational intensity, with authorities increasingly treating illegal e-cigarettes and online sales in the same way as other serious illicit tobacco activities. Belgian enforcement teams have targeted online sellers and physical shops, seizing thousands of illegal vaping devices in Brussels, Anderlecht, and Lierde, and inspections at shopping malls and galleries have uncovered products that fail to meet European standards, with some shipments traced back to China. Authorities are systematically targeting illegal online sales through social media, marketplaces and foreign websites, using active monitoring, mystery shopping and large-scale link takedowns, and combining these with high administrative fines and cooperation with platforms to block non-compliant foreign sites, which marks a shift from reactive seizures to proactive disruption of supply channels. Repeated large seizures – over 25,000 disposable e-cigarettes in Anderlecht, about 12,000 illegal e-cigarettes in central Brussels, and thousands more in subsequent inspections – demonstrate that non-compliant and banned products remain widely available despite tightened rules, and the concealment of products in hidden rooms and basements points to organised supply chains rather than isolated retail non-compliance. In parallel, cases involving dismantled illegal cigarette factories and counterfeit-cigarette production now increasingly sit alongside major

e-cigarette seizures, indicating that some criminal actors are diversifying from traditional illicit cigarettes into e-cigarettes, in line with Belgium’s stricter stance on disposable e-cigarettes and youth protection that has turned e-cigarettes into a high-margin, high-risk commodity for illicit networks.

The impending or actual ban on disposable e-cigarettes and the strict prohibition of online e-cigarette sales are designed to protect health, particularly of minors, but have coincided with evidence of a resilient black market that adapts quickly and continues to supply non-compliant products, with enforcement reports often noting that illegal items reappear in the same locations after previous checks, highlighting the challenge of achieving durable market clean-up through seizures alone. Geographically, many actions cluster in Brussels – including the city centre, the Agora Gallery and Anderlecht – and frequently involve specific commercial galleries or shops where repeated inspections uncover concealed stocks, suggesting the presence of identifiable high-risk retail nodes that function as distribution points for illegal e-cigarettes rather than a diffuse pattern of minor infractions across the entire retail landscape.

- **Locations of seizures:** Brussels city centre (Agora Gallery and nearby shops) and Anderlecht, with repeated targeted inspections in commercial galleries and high-risk zones.
- **Products seized:** Mainly disposable “puff” e-cigarettes, high-nicotine and smart/app-connected e-cigarettes, plus

thousands of packs of nicotine pouches that fail EU/Belgian standards.

- **Methods:** Hidden storage areas in shops and galleries, including basements, back rooms, and spaces behind false walls or mirrors used to hide stocks of disposable e-cigarettes and nicotine pouches.
- **Enforcement:** Joint inspections by Federal Public Health and police, repeated targeted checks at known hot-spots (e.g. Agora Gallery, Anderlecht), professional searches of premises, and high administrative fines for non-compliant products.



BELGIUM ILLCIT TRADE OVERVIEW

Belgian enforcement teams have targeted online sellers and physical shops, seizing thousands of illegal vaping devices in Brussels, Anderlecht, and Lierde. Inspections at shopping malls and galleries have uncovered products that fail to meet European standards, with some shipments traced back to China.

Legend



Seizure



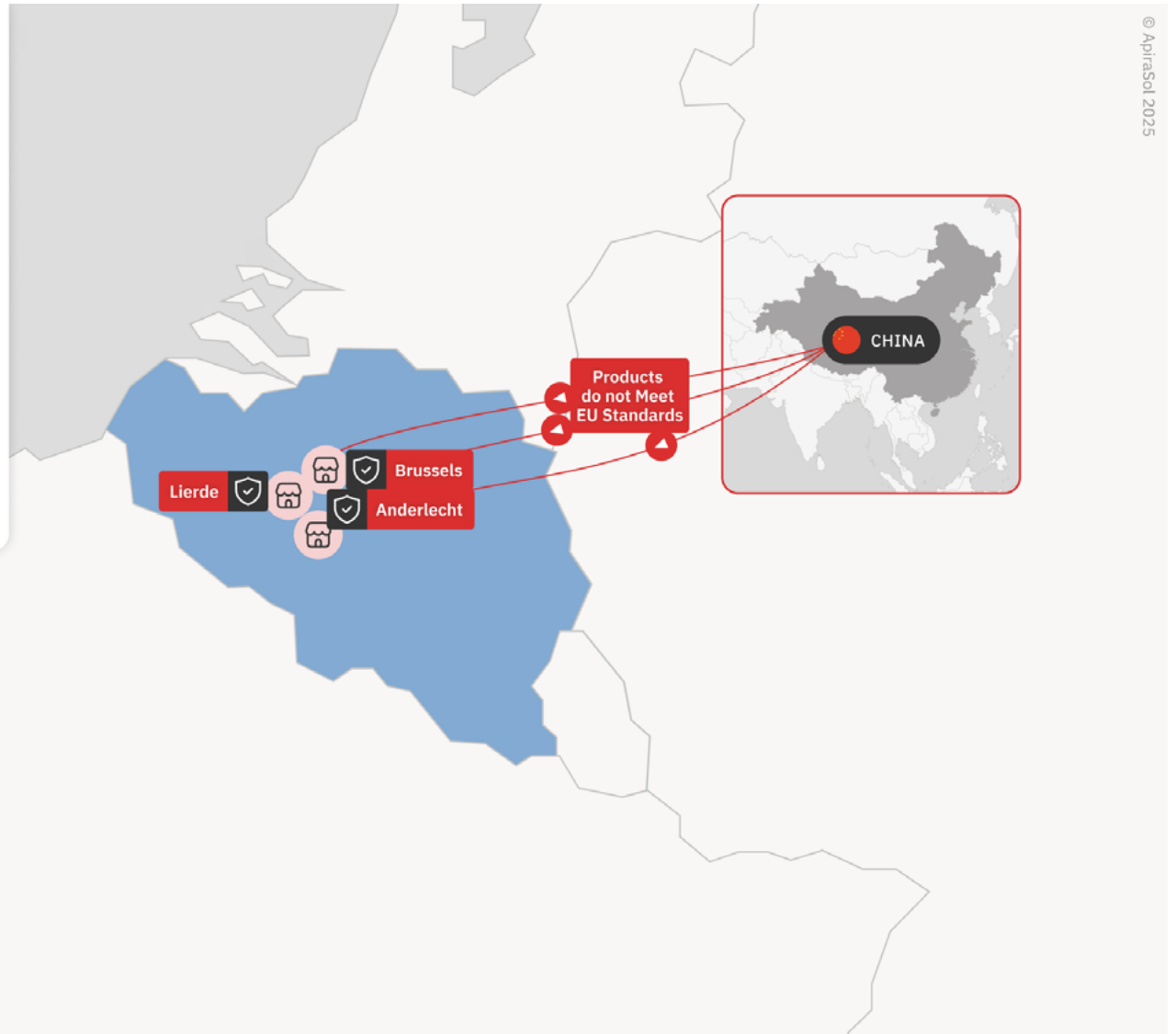
Shopping Malls and Galleries



Illicit Shipment



ENDS are regulated



Belgian police raided Brussels' Agora shopping gallery, seizing thousands of illegal disposable e-cigarettes ("puffs") and nicotine pouches from seven stores; despite the national sales ban, a large parallel market persists, with many products visibly displayed and compliance with official regulations lacking.

1 oct 2025 | International, Traffic

Bruxelles : Saisies spectaculaires de puffs dans des commerces



La vente de cigarettes jetables (puffs) est interdite en Belgique depuis le 1^{er} janvier. Néanmoins, on sait que règne en Belgique un vaste marché parallèle de la puff. Comme en France.

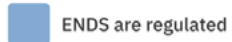
Legend



Raid



Seizure



ENDS are regulated

Source

<https://www.lemondedutabac.com/bruxelles-saisies-spectaculaires-de-puffs-dans-des-commerces/>



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