

ApiraSol

E-CIGARETTES IN BRAZIL 2024/2025 – Q2

SUPPLY CHAIN INTELLIGENCE
APRIL 2026



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**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
LATIN AMERICA**

E-Cigarette Trade - Latin America

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

E-cigarette regulations in Latin America vary widely, with most countries leaning toward strict bans while a few adopt structured frameworks. **Mexico, Brazil, and Argentina** enforce comprehensive prohibitions on the sale, import, advertising, and use of e-cigarettes and related devices, prioritizing public health and youth protection. In contrast, **Panama and Paraguay** have shifted to regulated models: Panama introduced strict controls on sale, advertising, and public use in 2025, while Paraguay passed a law establishing a full framework for importation, production, and commercialization of vaping products.

In 2024, China's export data showed hundreds of thousands of dollars' worth of e-cigarette shipments to banned markets like **Brazil** and **Argentina**. **Mexico's** reported imports from China dropped sharply in 2025 following its ban. While **Panama** and **Paraguay** have regulatory frameworks, their declared imports still fall short of China's reported export volumes, suggesting substantial leakage into informal or illicit channels.



Illicit e-cigarette trade remains widespread across Latin America. Banned countries—**Mexico, Brazil, and Argentina**—see thriving black markets despite strict prohibitions, with authorities reporting seizures at ports, warehouses, malls, and border provinces. In Mexico, enforcements have uncovered Chinese-origin shipments disguised as clothing or electronics and routed through Paraguay. Investigations also point to growing involvement of Mexican cartels, which are leveraging established trafficking routes to move Chinese-made vaping products into the U.S.—a development increasingly viewed as a major security concern. In regulated markets like **Panama** and **Paraguay**, enforcement challenges persist. Panama reports misdeclared shipments through Free Trade Zones, while Paraguay continues as a key transshipment hub for Brazil and Argentina. Despite introducing stricter controls on e-cigarette imports, these measures do not appear sufficient to effectively curb the flow of illicit products. Goods from China were often hidden in trucks or warehouses, and Brazilian authorities have intercepted multiple truckloads of illicit e-cigarettes originating from Paraguay—underscoring its strategic position in regional smuggling networks. These patterns highlight systemic enforcement challenges and the growing role of organized networks, underscoring the urgent need for stronger cross-border cooperation and tighter trade controls.

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E-CIGARETTE TRADE -
BRAZIL

Summary

In 2024, China reported \$168,000 in e-cigarette exports to Brazil, while Brazil recorded zero imports of these products from China. This results in a statistical gap of \$168,000, highlighting significant inconsistencies in bilateral trade reporting.

- **Regulatory Environment:** Brazil maintains a strict, ongoing ban on the importation and commercialization of e-cigarettes, which prevents legitimate, declared imports from appearing in official statistics.
- **Re-Routing:** Many shipments from China are routed through Paraguay or other neighboring countries to evade detection, which obscures the true origin of the goods and bypasses formal import channels.
- **Misdeclaration and Evasion:** Traffickers disguise e-cigarettes as electronics or other permissible products, or misdeclare their contents to avoid seizure and regulatory scrutiny.
- **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 Brazil and its trading partners exacerbate discrepancies, making reconciliation of bilateral trade figures challenging.
- **Prevalence of Smuggling and Illicit Trade:** The persistent black market and organized smuggling networks ensure con-

tinued supply, with frequent reports of large-scale seizures by customs and police, but these flows are not reflected in official trade data.

Together, these factors create substantial opacity in the market, making it difficult to accurately assess the real volume of e-cigarette imports and complicating regulatory and enforcement efforts.

Regulatory Overview

As of 2025, Brazil maintains a firm regulatory stance on electronic cigarettes (e-cigarettes), reflecting a public health approach that prioritizes caution in the face of emerging tobacco alternatives. The Brazilian Health Regulatory Agency (Anvisa) has upheld a ban on the manufacture, importation, sale, storage, transportation, and advertising of all electronic smoking devices (ESDs), including e-cigarettes, heated tobacco products, and similar devices. This prohibition, first established in 2009 through Resolution RDC No. 46, remains in effect following a comprehensive review and public consultation process concluded in 2024.

While personal use of e-cigarettes is not directly banned, Anvisa's updated regulation (RDC No. 855/2024) explicitly prohibits bringing e-cigarettes into the country, even for personal use or in trav-

elers' hand luggage. This effectively limits access to these products, as they cannot be legally purchased, imported, or carried into Brazil. Moreover, Law No. 9.294/1996, which governs smoking in public spaces, applies to e-cigarettes as well. This means that using e-cigarettes is prohibited in enclosed public spaces, workplaces, and public transportation. These restrictions are part of Brazil's broader efforts to protect public health and prevent the normalization of smoking behaviors, especially among youth.

Statistical Data (China as Origin)

China's declared exports of e-cigarettes to Brazil in 2024 totaled \$168,000, while Brazil's declared imports from China reported \$0—creating a **discrepancy of approximately \$168,000**. This discrepancy suggests the likely presence of indirect routing through third countries, underreporting, product misdeclaration, or other customs documentation issues. Such anomalies highlight the challenges in accurately monitoring cross-border e-cigarette trade flows and identifying possible illicit activities.

Total Value 2024:

- Total Exports from China 2024: \$168,000
- Total Imports from China 2024: 0
- **Statistical Gap: \$168,000**

EXPORTS OF E-CIGARETTES FROM CHINA TO BRAZIL - 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	BRAZIL	128	83
24041990	Other products containing nicotine substitutes, intended for inhalation without combustion	CHINA	BRAZIL	1	0
24041910	Other products containing tobacco substitutes, intended for inhalation without combustion	CHINA	BRAZIL	0	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	BRAZIL	39	0
Total:				168	83

IMPORTS OF E-CIGARETTES TO BRAZIL 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	BRAZIL	N/A	N/A
24041990	Products containing nicotine substitutes, intended for inhalation without combustion (excl. . . .	CHINA	BRAZIL	N/A	N/A
24041910	Products containing tobacco substitutes, intended for inhalation without combustion (excl. . . .	CHINA	BRAZIL	N/A	N/A
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	BRAZIL	0	0
Total:				0	0

 **BRAZIL**
STATISTICAL DATA



Exports from China to Brazil

168,000

Total 2024 Value (USD)
1H 2025 Value (USD): 83,000

Imports to Brazil from China

0

Total 2024 Value (USD)
1H 2025 Value (USD): 0

Statistical Data Gap *

168,000

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



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

Recent enforcement news reveals that Brazilian authorities have intensified crackdowns on illegal e-cigarettes, seizing hundreds of thousands of units at ports and highways. According to the 2024 Balanço Aduaneiro, Receita Federal recorded a record volume of electronic products seized, with illegal e-cigarettes alone reaching R\$ 179.4 million in 2024, a 190% increase over 2023. Major interceptions at Santos Port uncovered shipments originating from China, destined for Uruguay and Paraguay, disguised as electronics.

Joint operations by federal highway police, customs, and local law enforcement have resulted in the seizure of millions of illegal devices throughout 2024, with brands such as [REDACTED] appearing frequently among confiscated goods. Smuggling methods include concealment among regular cargo, misdeclaration, and the use of false vehicle compartments at major border crossings like the Friendship Bridge. Sentencing of smugglers and ongoing arrests signal a transition from sporadic smuggling to coordinated, large-scale criminal activity.

The surge in seizures and escalating enforcement response reflect tightening border controls, coordinated intelligence sharing, and Brazil's continued ban on the commercialization, importa-

tion, and transport of electronic smoking devices. Despite robust enforcement, persistent demand and profitability drive ongoing illicit trade, requiring Brazilian authorities to maintain intensive surveillance and strengthen cross-border cooperation to disrupt supply chains.

- **Locations of seizures:** Santos Port, Paraná, Friendship Bridge (Foz do Iguaçu), major highways, border regions with Paraguay
- **Products seized:** E-cigarettes (including standard, flavored, and cannabis-infused e-cigarettes); shipments from China
- **Brands seized:** [REDACTED], and other popular international brands
- **Methods:** Goods routed through Paraguay, concealed among electronics, disguised as personal items or in regular cargo, hidden in false vehicle compartments
- **Enforcement:** Operations by federal highway police, customs, Coast Guard, and local law enforcement; intensified crackdowns, arrests, and multi-agency coordination

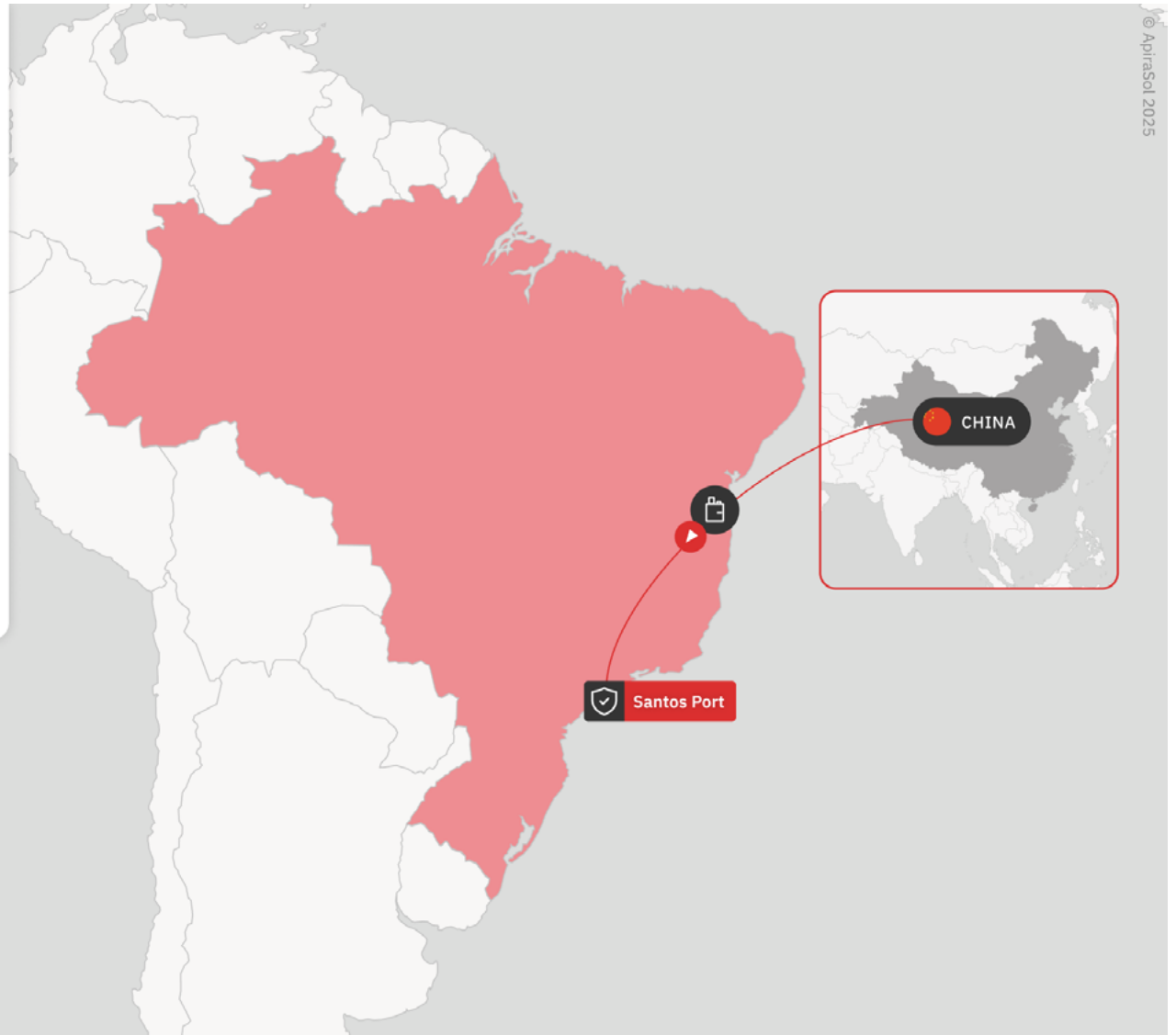


BRAZIL ILLCIT TRADE OVERVIEW

Brazilian authorities have intensified nationwide crackdowns on illicit e-cigarettes, seizing large-scale shipments linked to China at major entry points such as the Port of Santos, São Paulo, as well as key border corridors. A major operation at Santos Port was reported as part of an international smuggling chain tied to organized crime networks attempting to re-import products into Brazil through circular export schemes. While some cases also involved cannabis-infused e-cigarettes, revealing increasingly sophisticated smuggling tactics and the evolving criminal networks behind the trade.

Legend

-  Seizure
-  China-Made Illegal E-cigarettes
-  Illicit Shipment
-  ENDS are banned





The Federal Public Ministry (MPF) in Brazil secured the conviction of a man for smuggling imported e-cigarettes, the sale of which is prohibited by the health agency Anvisa. Authorities seized 548 foreign e-cigarette units, mostly from China and Paraguay. The man was sentenced to 4 years in a semi-open prison regime.

PARAÍBA

CRIMINAL

Ministério Público obtém condenação por contrabando de cigarros eletrônicos e posse ilegal de munição na Paraíba

Comércio clandestino de vapes, divulgados via Instagram, resultou em pena de reclusão e detenção

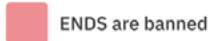
Legend



Seizure



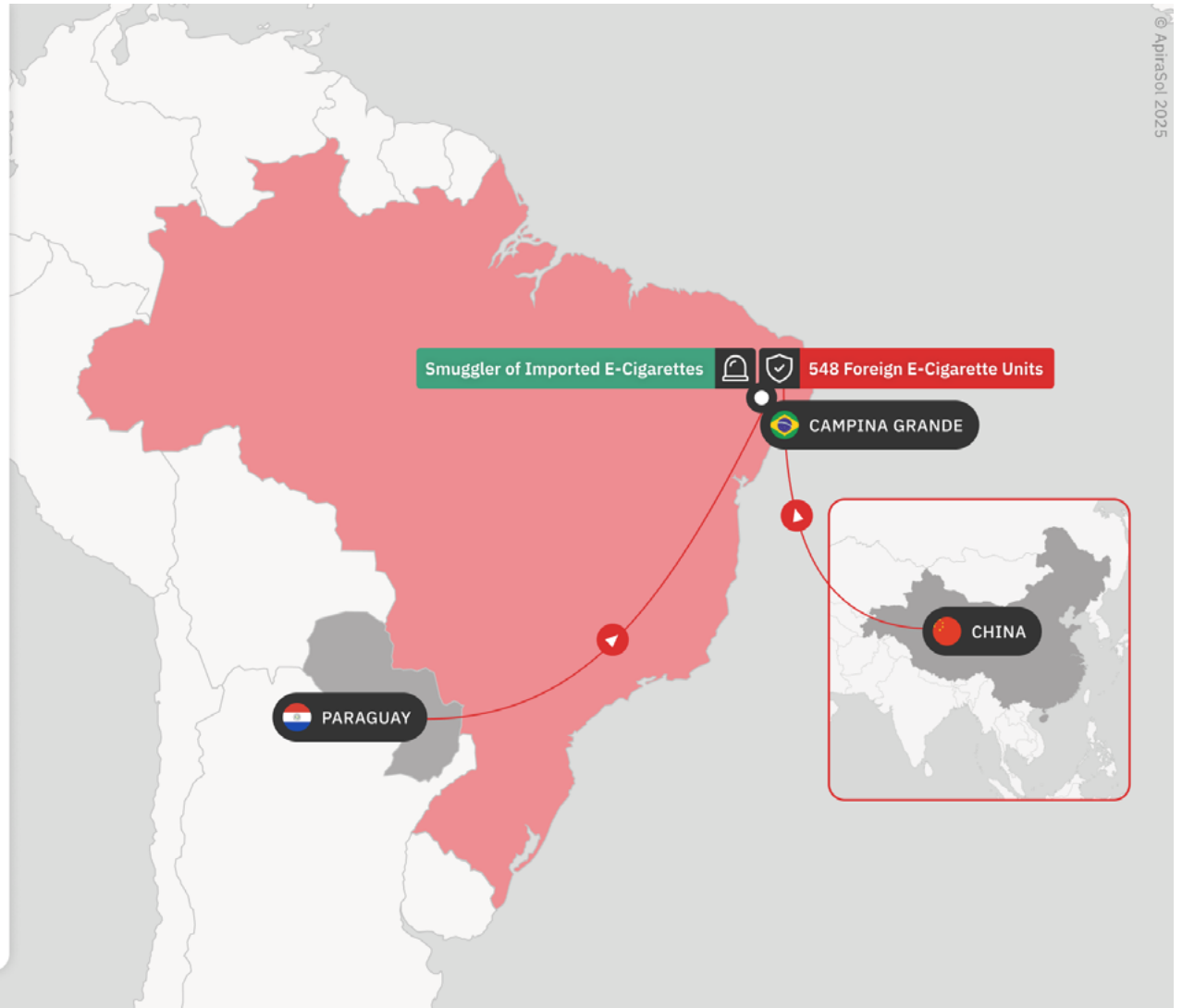
Arrest



ENDS are banned

Source

<https://www.reporterpb.com.br/noticia/paraiba/2025/07/21/ministerio-publico-obtem-condenacao-por-contrabando-de-cigarros-eletronicos-e-posse-ilegal-de-municao-na-paraiba/175280.html>



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