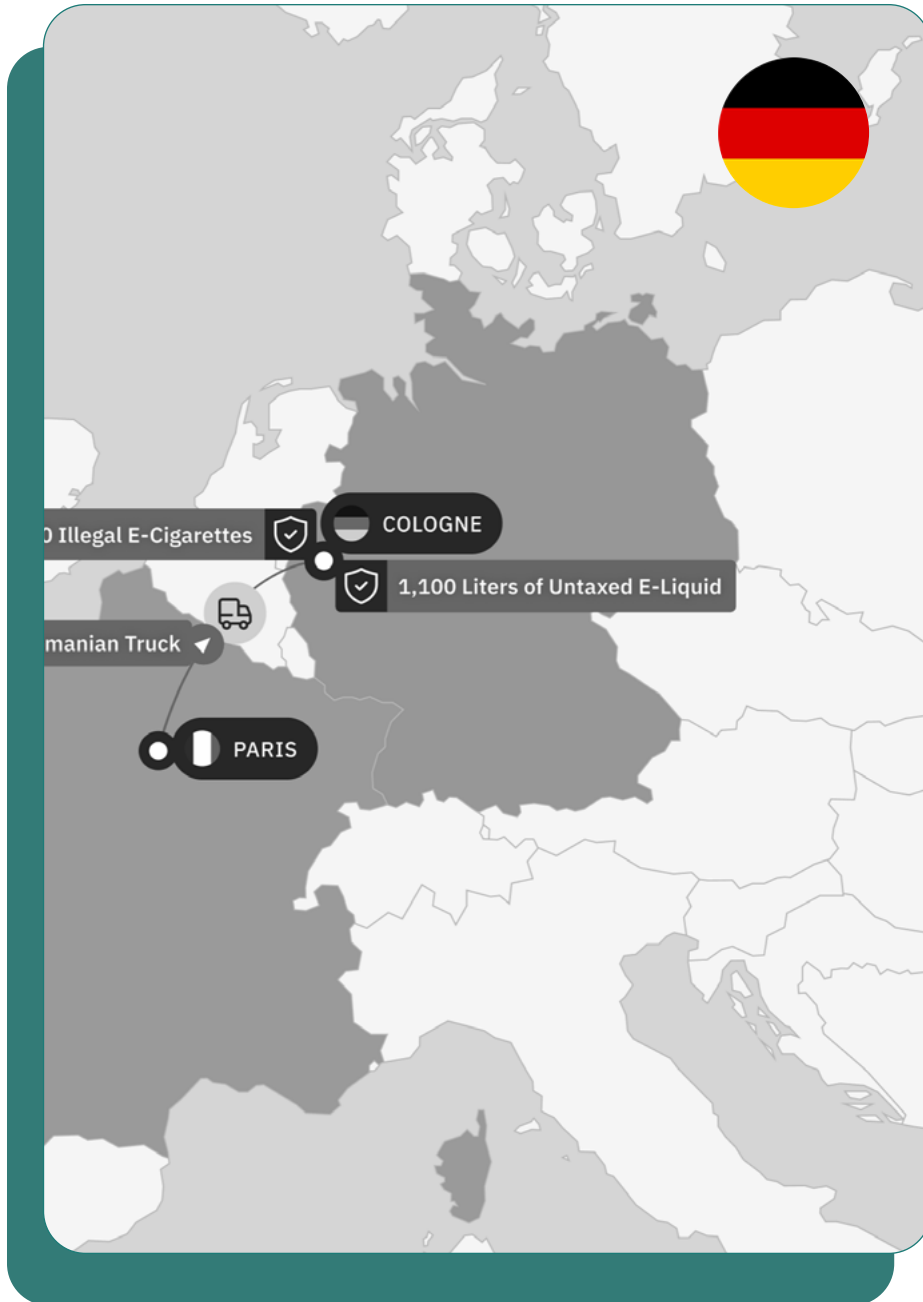


ApiraSol

E-CIGARETTES IN GERMANY 2024/2025 – Q2

SUPPLY CHAIN INTELLIGENCE
APRIL 2026



Overview

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2. E-CIGARETTE TRADE - EUROPE

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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.

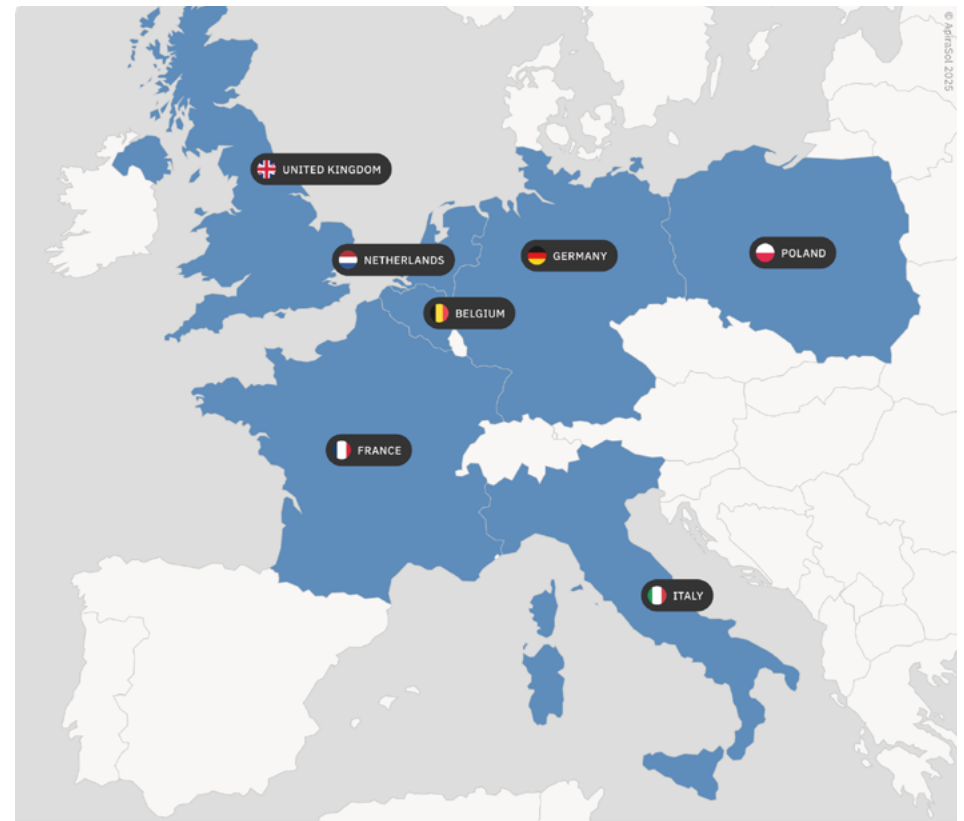
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**E-CIGARETTE
TRADE - EUROPE**

E-Cigarette Trade - Europe

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

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.

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E-CIGARETTE TRADE -
GERMANY

Summary

The 2024 mirror statistics for e-cigarettes between China and Germany show a negative gap of about USD 79 million, with Germany reporting higher imports from China than China reports as exports to Germany. This discrepancy reflects how regulation, routing, reporting and illicit activity interact in a large, tightly taxed e-cigarette market.

- **Regulatory Environment:** E-cigarettes in Germany are subject to EU-TPD rules plus a national excise on e-liquids that has been phased in and increased over time, alongside strict product notification, packaging and advertising restrictions. This tends to make German import data more detailed and inclusive for e-cigarette products, while some related items may appear less specifically or under different headings in Chinese export statistics, contributing to higher recorded imports than exports.
- **Transshipment and re-routing:** Chinese e-cigarettes frequently reach Germany via third-country hubs or other EU entry points, so Germany still records origin as China while Chinese customs may attribute exports to the transit partner or split flows across several destinations. This re-routing suppresses China's direct export total to Germany even though the same goods appear in German import data, feeding into the observed USD 79 million gap.
- **Misdeclaration and evasion:** To manage excise and regulatory pressure, traders can declare devices, components or liquids under broader electrical or chemical codes, or manipulate declared values and product descriptions to reduce tax and scrutiny. If German authorities then reclassify more of these goods into e-cigarette-related categories than China does on the export side, Germany's recorded imports will exceed China's exports for the targeted product group.
- **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 Germany and its trading partners exacerbate discrepancies, making reconciliation of bilateral trade figures challenging.
- **Prevalence of Smuggling and Illicit Trade:** Germany combines strong e-cigarette demand with rising excise, and enforcement reports show significant seizures of untaxed and illegally imported e-cigarettes, often of Chinese origin and routed via neighbouring countries, with many cases framed as duty-evasion schemes. While mirror data cannot directly quantify illegal flows, this context makes it plausible that part of the China–Germany e-cigarette trade moves through semi-formal or illicit channels that are only partially reflected in China's official export figures, adding another layer to the roughly USD 79 million discrepancy.

Regulatory Overview

Germany regulates e-cigarettes under the EU Tobacco Products Directive (TPD) and national laws like the TabakerzG and Protection of Young Persons Act. E-cigarettes are legal but strictly controlled to protect public health, especially youth. The minimum age for purchase and use is 18, with mandatory age verification for both physical and online sales.

Both nicotine-containing and nicotine-free e-liquids are regulated similarly. Products must include clear health warnings, such as “This product contains nicotine which is a highly addictive substance,” and packaging must be child-resistant, tamper-proof, and free from youth-targeted promotions. Flavors remain unrestricted and online sales are permitted.

Germany imposes a rising excise tax on e-liquids, set to reach €0.32/mL by 2026, with a national tax stamp system being implemented. A ban on disposable e-cigarettes is expected in 2025 due to environmental and youth concerns. Outdoor advertising has been banned since 2024, and public use is restricted in federal facilities and transport hubs under the Federal Non-Smokers Protection Act.

Statistical Data (China as Origin)

China’s declared exports of e-cigarettes to Germany in 2024 totaled \$685,681,000, while Germany’s declared imports from China reached \$764,736,000—creating a **discrepancy of approximately \$79.06 million**. This negative mirror gap is consistent with a mix of factors, including strict German regulation and excise taxation on vaping products, complex routing of Chinese exports via EU hubs, misdeclaration and reclassification of devices and liquids, timing and completeness differences in annual reporting, customs data coverage limits (especially for e-commerce and express parcels), and the growing role of untaxed or counterfeit Chinese e-cigarettes in Germany’s illicit and semi-formal market.

Total Value 2024:

- Total Exports from China 2024: \$685,681,000
- Total Imports from China 2024: \$764,736,000
- **Statistical Gap: \$79,055,000**

EXPORTS OF E-CIGARETTES FROM CHINA TO GERMANY - 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	GERMANY	359,520	180,027
24041990	Other products containing nicotine substitutes, intended for inhalation without combustion	CHINA	GERMANY	8,787	2,661
24041910	Other products containing tobacco substitutes, intended for inhalation without combustion	CHINA	GERMANY	0	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	GERMANY	317,374	193,866
Total:				685,681	376,554

IMPORTS OF E-CIGARETTES TO GERMANY 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	GERMANY	341,597	209,502
24041990	Products containing nicotine substitutes, intended for inhalation without combustion (excl. . . .	CHINA	GERMANY	11,926	4,364
24041910	Products containing tobacco substitutes, intended for inhalation without combustion (excl. . . .	CHINA	GERMANY	7	2
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	GERMANY	411,206	253,915
Total:				764,736	467,783

 **GERMANY**
STATISTICAL DATA



Exports from China to Germany

685,681,000

Total 2024 Value (USD)
1H 2025 Value (USD): 376,554,000

Imports to Germany from China

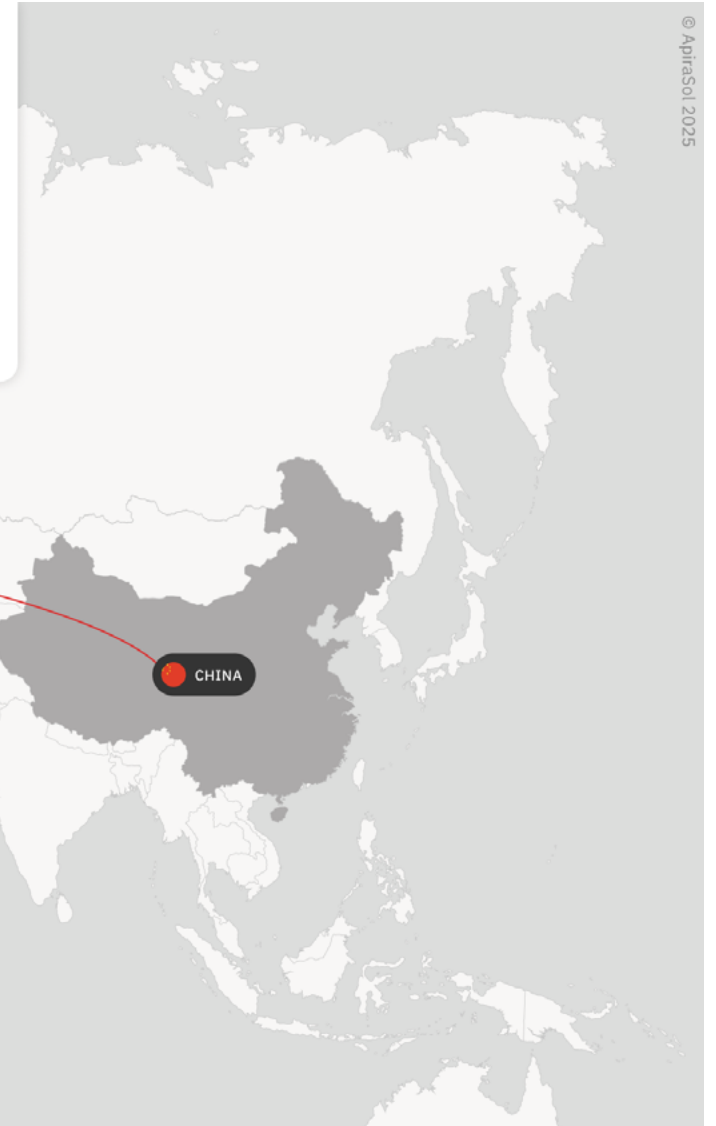
764,736,000

Total 2024 Value (USD)
1H 2025 Value (USD): 467,783,000

Statistical Data Gap *

-79,055,000

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



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GERMANY

TRADE DATA (MIRRORED DATA FROM INDONESIA AND GLOBAL SHIPMENTS DATA)

The small number of identified e-cigarette and disposable e-cigarette shipments between China and Germany in 2024 should be interpreted as a limitation of available accessible data, not as evidence of a small underlying flow. Because neither China nor Germany makes detailed, shipment-level customs data publicly available, what is visible represents only a partial sample of movements. Given the size and continued growth of the German e-cigarette market, this suggests that available shipment records reflect only a narrow slice of actual cross-border flows, rather than the full scale of imports.

Shipments:	7 Trade Shipments
Period:	January - December 2024
Origin Countries:	China: 86 %, Indonesia: 14 %
Origin Ports:	Not declared: 43 %, Sekupang: 27 %, Batu Ampar: 15 %, Cengkareng Soekarno Hatta U: 15 %
Destination Countries:	Germany
Destination Ports:	Hamburg: 28 %, Frankfurt Main: 28 %, Munchen: 15 %, Wiesbaden: 15 %, Not declared: 14 %
Products:	Pods
E-Cigarette Brands:	
Mode of Transport:	Unknown: 86 %, Road: 14 %
Value declared:	28,174.69 USD (100 % of shipments)
Weight declared:	1,335.49 KG (100 % of shipments)

GERMANY

Number of exporters:	5
Number of importers:	6
Top Exporters:	<i>[Redacted]</i>
Top Importers:	<i>[Redacted]</i>
HS Codes declared in shipments:	240412: Other products containing nicotine, intended for inhalation without combustion (3 shipments) 854340: Electronic cigarettes and similar personal electric vaporising devices (3 shipments) 240419: Other products intended for inhalation without combustion (1 shipment)



GERMANY

TRADE DATA (Mirrored Data from Indonesia and Global Shipments Data)



Shipments (Period FY 2024)

7

Quantity

28,174.69

Value (USD)

All included shipments and brands are recognized by regulatory authorities and involve only companies operating in compliance with legal requirements.



Destination Ports

- Hamburg (28 %)
- Frankfurt Main (28 %)
- München (15 %)
- Wiesbaden (15 %)
- Not declared (14 %)



Origin Ports from Indonesia

- Not declared (43 %)
- Sekupang (27 %)
- Batu Ampar (15 %)
- Cengkareng Soekarno Hatta U (15 %)

Mode of Transportation

Unknown: 86 %, Road: 14 %

E-Cigarette Products

Pods

Legal Brands at Time of Shipment

Top Importers

Top Exporters

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

German enforcement news on e-cigarettes shows a clear move from isolated seizures to systematic, large-scale crackdowns on tax evasion and organised smuggling along the e-cigarette supply chain. Customs and tax authorities now combine raids on retail e-cigarette and shisha shops, warehouse and pallet inspections, and highway controls, repeatedly uncovering hundreds of thousands of untaxed or non-compliant e-cigarettes and disposable e-cigarettes, with estimated tax losses often in the hundreds of thousands or even millions of euros. German customs and police have dismantled smuggling rings moving untaxed e-cigarettes from China via the Netherlands, with large-scale seizures in warehouses, shops, and even garden sheds in cities like Cologne, Essen, and Saarlouis. Raids have uncovered hundreds of thousands of illegal e-cigarettes, often concealed in trucks or hidden among other goods, and have led to the arrest of suspects from multiple nationalities.

A dedicated excise on e-liquids, introduced with a grace period and then fully enforced, is the key regulatory driver, turning unpaid liquid and associated devices into high-priority fiscal offences for customs and tax offices. Cases across North Rhine-Westphalia and major logistics corridors show that enforcement is framed primarily around duty evasion and large-scale smuggling rather than consumer possession, and authorities increasingly present e-cigarette seizures as compara-

ble to classic tobacco smuggling cases, with criminal proceedings directed at drivers, wholesalers, company representatives and suspected organisers behind the networks.






- **Locations of seizures:** Retail shops and warehouses in North Rhine-Westphalia (including Cologne and Essen), Saarlouis and other hubs; highway checks such as on the A4; operations around ports and customs offices like Hamburg and Münster; and smaller storage sites such as garden sheds and back rooms.
- **Products seized:** Mainly disposable e-cigarettes and cartridge-based e-cigarettes plus large volumes of e-liquids, often untaxed, non-compliant or counterfeit, with individual cases ranging from tens of thousands up to several hundred thousand devices and hundreds of litres of liquid.
- **Brands seized:** Reports rarely list specific brands, focusing instead on the illegal, non-EU-standard or counterfeit status of seized products.
- **Methods:** E-cigarettes hidden in trucks among other goods, stored in warehouses, shops, back rooms and garden sheds, and moved through chains routing untaxed e-cigarettes from China via the Netherlands into Germany.
- **Enforcement:** Joint customs–tax–police operations combining shop and warehouse raids, inventory/tax checks and motorway controls, with cases treated as duty-evasion and organised-crime offences leading to arrests of drivers and organisers from multiple nationalities.

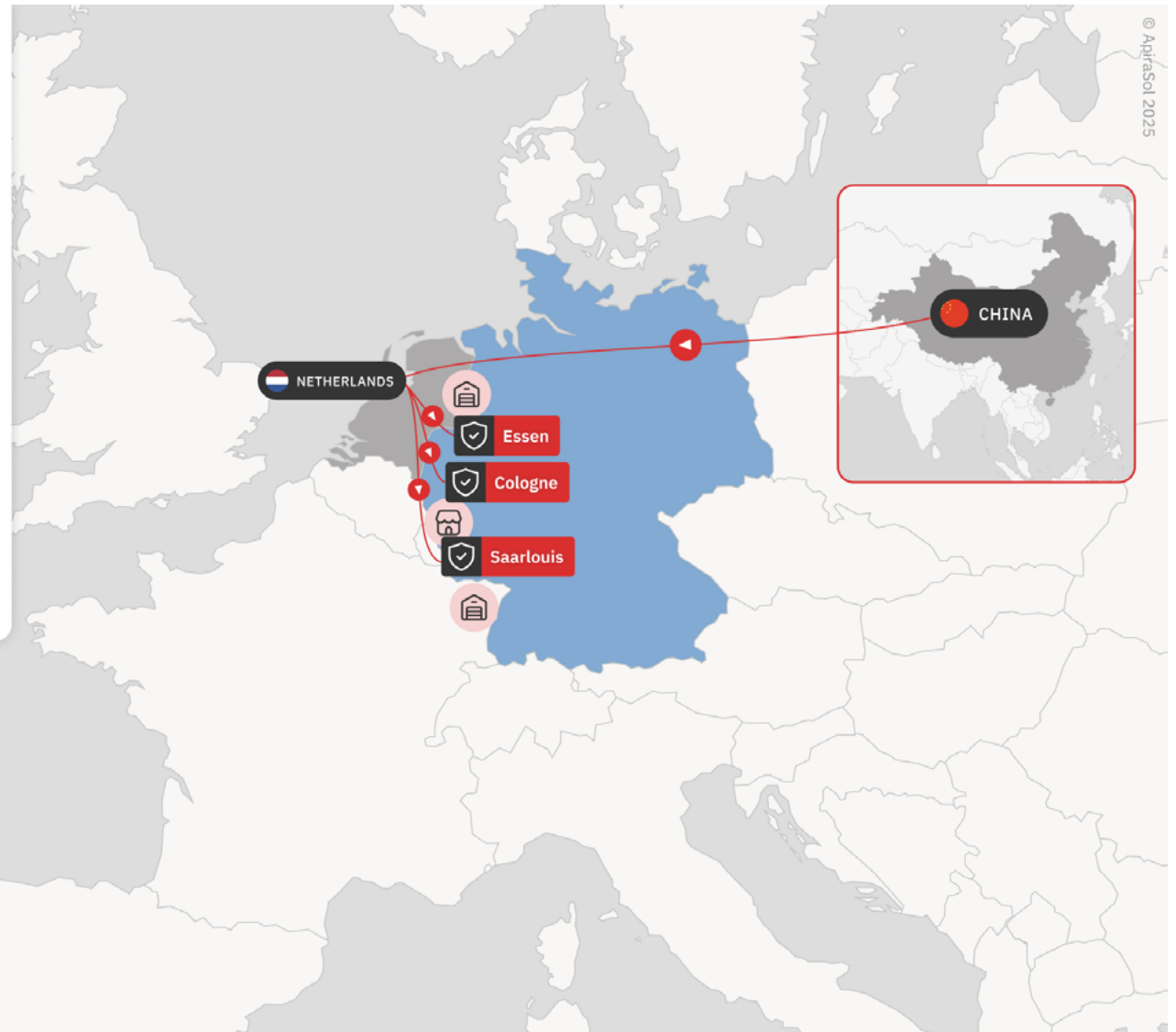


GERMANY ILLCIT TRADE OVERVIEW

German customs and police have dismantled smuggling rings moving untaxed e-cigarettes from China via the Netherlands, with large-scale seizures in warehouses, shops, and even garden sheds in cities like Cologne, Essen, and Saarlouis. Raids have uncovered hundreds of thousands of illegal e-cigarettes, often concealed in trucks or hidden among other goods, and have led to the arrest of suspects from multiple nationalities.

Legend

-  Seizure
-  Warehouses
-  Shops
-  Illicit Shipment
-  ENDS are regulated





GERMANY ENFORCEMENT NEWS

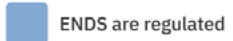
Cologne customs intercepted a Romanian truck heading from Paris to Germany, seizing 45,000 illegal e-cigarettes and 1,100 liters of untaxed e-liquid worth over €1 million—the city’s largest e-cigarette bust in recent years.

German Authorities Seize 45,000 Illegal E-Cigarettes in Cologne; Confiscated Products Resemble Fumot Devices

Jun. 12

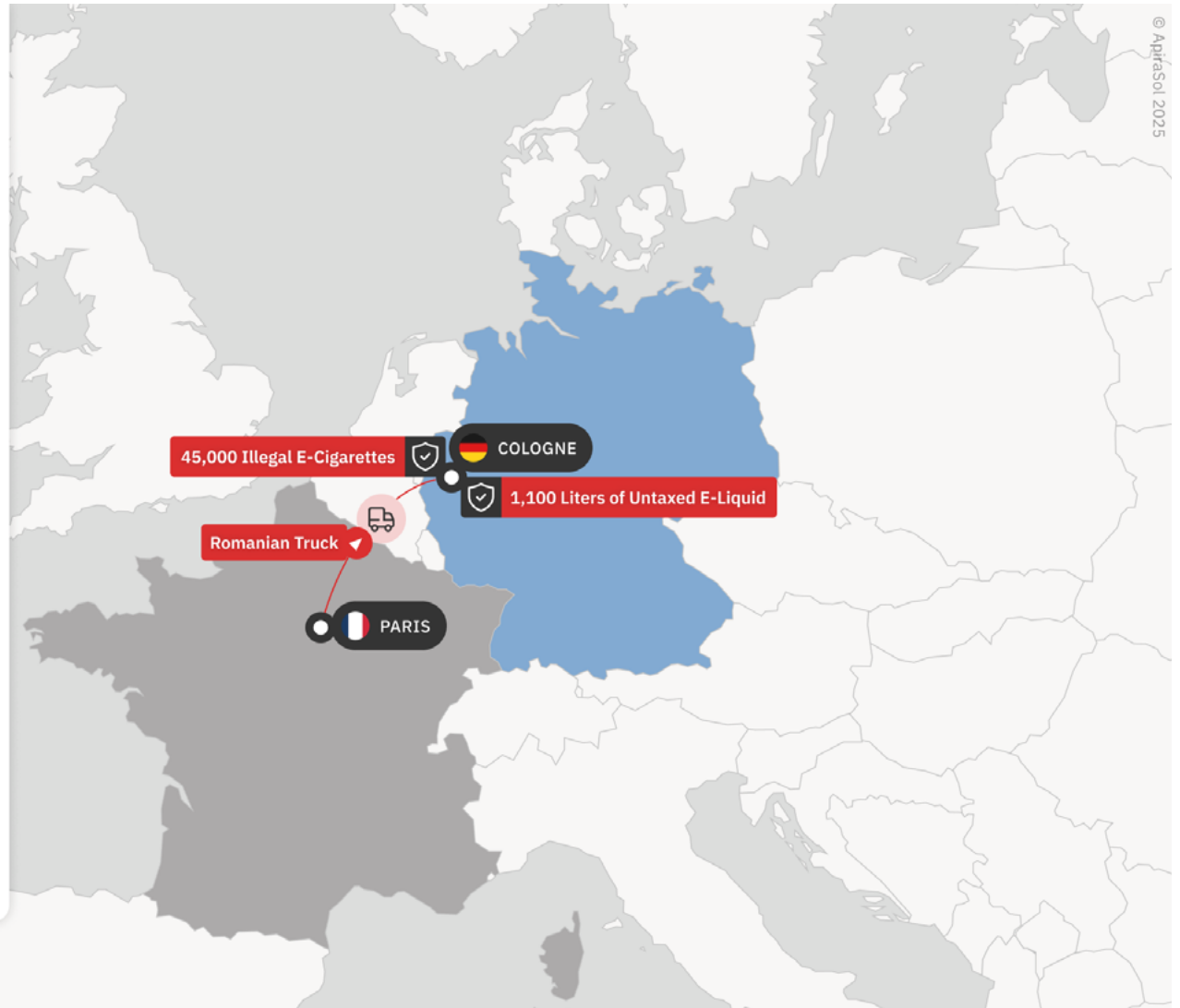


Legend



Source

<https://www.2firsts.com/news/german-customs-seize-45000-illegal-e-cigarettes-on-a4-highway>



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