

# ApiraSol

## E-CIGARETTES IN ITALY 2024/2025 – Q2

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SUPPLY CHAIN INTELLIGENCE  
APRIL 2026



# Overview

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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.

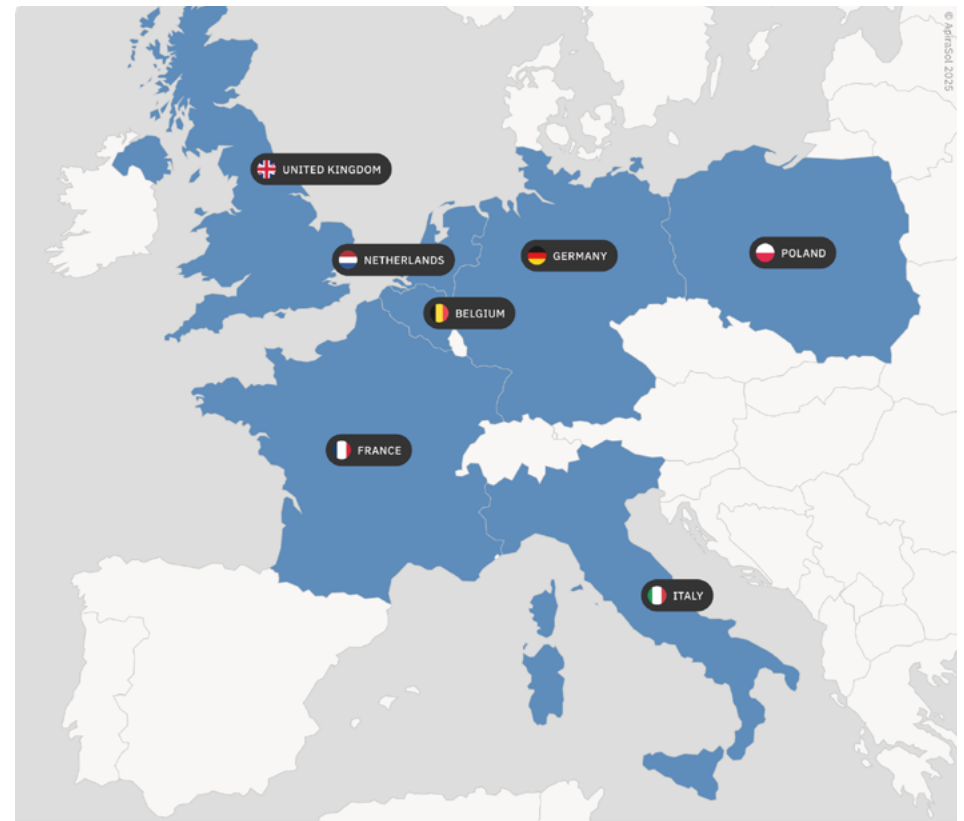
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**E-CIGARETTE  
TRADE - EUROPE**

# E-Cigarette Trade - Europe

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

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 -  
ITALY

# Summary

The 2024 mirror data for e-cigarettes between China and Italy show a positive statistical gap of about USD 4.47 million, with China reporting higher exports than Italy reports as imports from China. This gap reflects how Italy's regulated e-cigarette market, complex trade routing and data limitations interact, rather than a single isolated cause.

- **Regulatory Environment:** Italy applies EU-TPD rules plus a specific excise on e-cigarette products, within a broader, mature tobacco-control and tax framework. Differences in how Italy and China classify and tax nicotine products (for example which items fall under e-cigarette vs other nicotine categories) can lead China to record more value under e-cigarette-related codes than appears in Italy's corresponding import lines.
- **Re-Routing:** Chinese e-cigarette products destined for Italy may be shipped via third-country hubs or other EU entry points, with China recording direct exports to Italy under e-cigarette-specific codes while some of these goods are ultimately cleared in Italy under broader or different product categories. This routing and re-attribution can contribute to China's export totals not matching Italy's more narrowly captured import figures.
- **Misdeclaration and Evasion:** Traders facing Italy's excise and regulatory obligations may misdeclare devices, liquids or components under alternative tariff lines, under-value shipments, or route some flows through semi-formal channels to reduce tax and scrutiny. Such practices can mean that part of what China records as e-cigarette exports is not fully mirrored in Italy's declared e-cigarette imports, because some consignments are hidden within other headings or not properly declared at import.
- **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 Italy and its trading partners exacerbate discrepancies, making reconciliation of bilateral trade figures challenging.
- **Prevalence of Smuggling and Illicit Trade:** Italy has relatively low illicit cigarette consumption by EU standards, but still experiences notable illicit tobacco activity and a growing problem with contraband and counterfeit e-cigarettes. In this context, some e-cigarette flows recorded in China's export data may enter Italy through smuggling, misdeclaration or other illicit channels and therefore be only partially or inconsistently reflected in Italy's official import statistics, making the prevalence of smuggling and illicit trade a plausible contributor to the observed gap.

## Regulatory Overview

Italy regulates e-cigarettes under the framework of the European Union's Tobacco Products Directive, which sets standards for nicotine concentration and volume, packaging, health warnings, and advertising restrictions. The sale and distribution of e-liquids are tightly controlled, with only specialist e-cigarette shops, tobacconists, pharmacies, and parapharmacies authorized to sell these products offline. As of January 1, 2025, the online sale of nicotine-containing e-liquids is strictly prohibited, both domestically and across borders.

Taxation on e-liquids has also been revised in 2025. Nicotine-containing e-liquids are subject to an excise duty of €0.14 per milliliter, while nicotine-free variants are taxed at a lower rate of €0.10 per milliliter. All e-liquid products must carry a tax label, and non-compliance can lead to severe penalties, including license suspension and criminal charges.

Italy enforces a strict minimum age of 18 for the purchase and use of e-cigarettes. Retailers are required to verify customer age at the point of sale, and digital platforms must implement robust age verification systems. Packaging and labeling regulations are aligned with the EU Tobacco Products Directive, which includes clear health warnings and other product details.

Italy's advertising rules for e-cigarettes are among the most lenient in the EU, allowing certain promotional activities under regu-

lated conditions. Public use of e-cigarettes is also less restricted compared to other member states, with fewer limitations on where vaping is permitted. Despite these relaxed rules, enforcement against illegal sales and non-compliant products remains strict, with hundreds of unauthorized websites shut down in recent years.

## Statistical Data (China as Origin)

China's declared exports of e-cigarettes to Italy in 2024 totaled \$133,955,000, while Italy's declared imports from China reached \$129,484,000—creating a **discrepancy of approximately \$4.47 million**. This discrepancy can be linked to a combination of factors: regulatory environment, differences in product classification and coverage, misdeclaration or under-recording on the Italian import side, timing and revision effects in annual trade statistics, customs-data limitations (especially for small parcels and complex product mixes), and the role of illicit and semi-formal e-cigarette flows that may be only partially reflected in Italy's official import figures despite Chinese exports being recorded under e-cigarette categories.

### Total Value 2024:

- Total Exports from China 2024: \$133,955,000
- Total Imports from China 2024: \$129,484,000
- **Statistical Gap: \$4,471,000**

## EXPORTS OF E-CIGARETTES FROM CHINA TO ITALY - 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	ITALY	69,573	31,044
24041990	Other products containing nicotine substitutes, intended for inhalation without combustion	CHINA	ITALY	2,438	973
24041910	Other products containing tobacco substitutes, intended for inhalation without combustion	CHINA	ITALY	11	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	ITALY	61,933	28,330
<b>Total:</b>				<b>133,955</b>	<b>60,347</b>

## IMPORTS OF E-CIGARETTES TO ITALY 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	ITALY	106,836	61,701
24041990	Products containing nicotine substitutes, intended for inhalation without combustion (excl. . . .	CHINA	ITALY	2,201	1201
24041910	Products containing tobacco substitutes, intended for inhalation without combustion (excl. . . .	CHINA	ITALY	0	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	ITALY	20,447	9,849
<b>Total:</b>				<b>129,484</b>	<b>72,751</b>

 **ITALY**  
STATISTICAL DATA

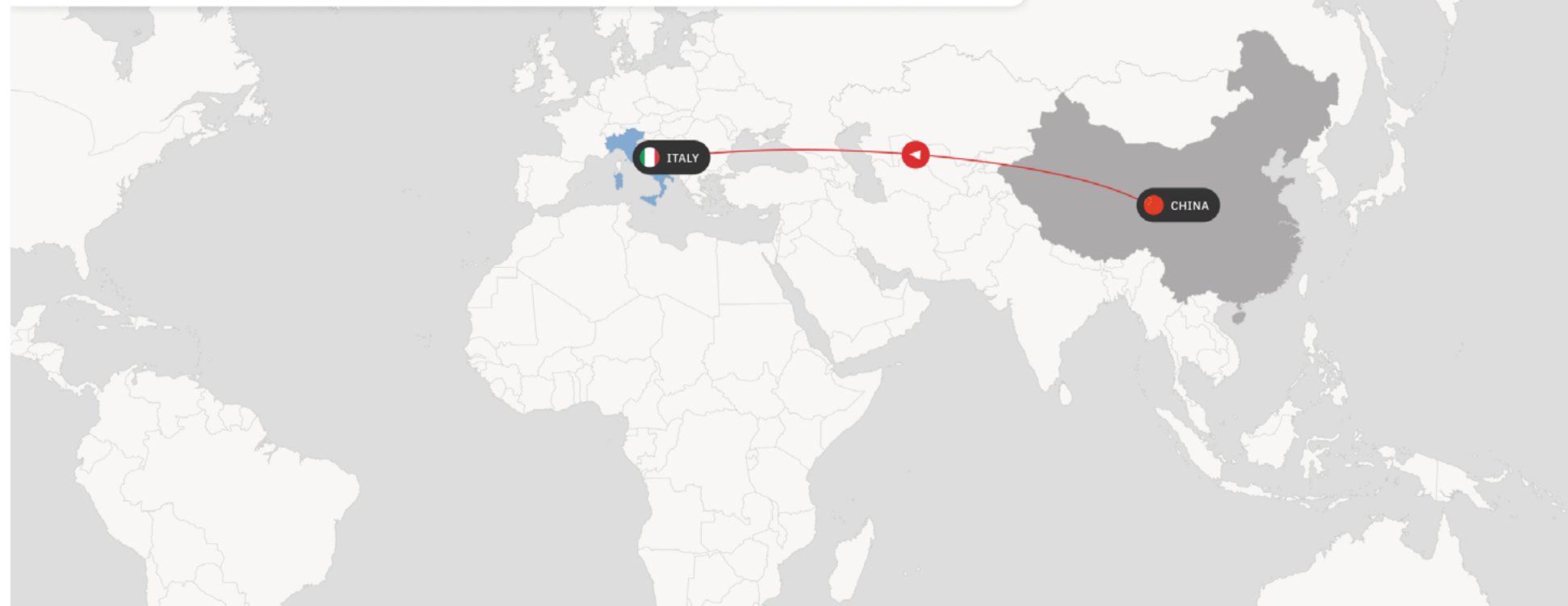


Exports from China to Italy  
**133,955,000**  
Total 2024 Value (USD)  
1H 2025 Value (USD): 60,347,000

Imports to Italy from China  
**129,484,000**  
Total 2024 Value (USD)  
1H 2025 Value (USD): 72,751,000

**Statistical Data Gap \***  
**4,471,000**

\* 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 Italy**.

Italian enforcement reports show that e-cigarette controls now range from local retail checks to industrial-scale seizures, with a strong focus on tax, licensing and product-safety breaches. Authorities repeatedly highlight missing state tax stamps, lack of authorization from the customs and monopoly agency, and excessive nicotine or contaminant levels, treating many cases as tobacco contraband rather than minor regulatory infractions.

Italian authorities have intercepted massive quantities of illegal e-cigarettes and accessories in warehouses and logistics hubs, including in areas such as Viareggio and Gallarate, as well as in other regions across the country. Raids in provinces like Brianza and Lucca have led to the confiscation of millions of products, some non-compliant or aimed at minors, and to the reporting or arrest of local suspects involved in their distribution.

Across these operations, methods of concealment and organisation mirror classic tobacco contraband: unlicensed storage depots, hidden bulk stocks, products channelled outside the monopoly system to evade excise, and large online sales schemes supplying consumers nationwide. Enforcement responses combine criminal complaints for contraband and unauthorized sale of monopoly goods, very high administrative fines, suspension of retail licences, and blocking or takedown of illicit online outlets,

confirming that Italy now treats illicit e-cigarettes as a core component of its broader tobacco-smuggling and fiscal-fraud landscape.







- **Locations of seizures:** Seizures in retail outlets in Cirò Marina (Calabria), in a large warehouse in the province of Monza e Brianza (Lombardy), and in a major warehouse and online-sales hub in the Viareggio/Lucca area (Tuscany).
- **Products seized:** Hundreds of thousands to tens of millions of items, including disposable e-cigarettes, refillable devices, filters, papers and e-liquids, often without state tax stamps, sold without monopoly authorisation, or containing excessive nicotine and contaminants.
- **Brands seized:** Reporting focuses on legality and safety (foreign, often Chinese, “e-cig” and disposables) rather than detailed brand lists, with emphasis on non-compliance and youth appeal.
- **Methods:** Stocks hidden in back rooms, clandestine depots and mixed with legitimate goods, or misdeclared as toys or cosmetics in pallets and containers, alongside large-scale online contraband supplied from hidden warehouses.
- **Enforcement:** Guardia di Finanza and customs/monopoly authorities conduct coordinated raids and audits, treating cases as contraband and unauthorized sale of monopoly goods, with criminal charges against Italian and foreign (including Chinese) suspects, very high fines, licence suspensions, and measures against illegal online sellers.

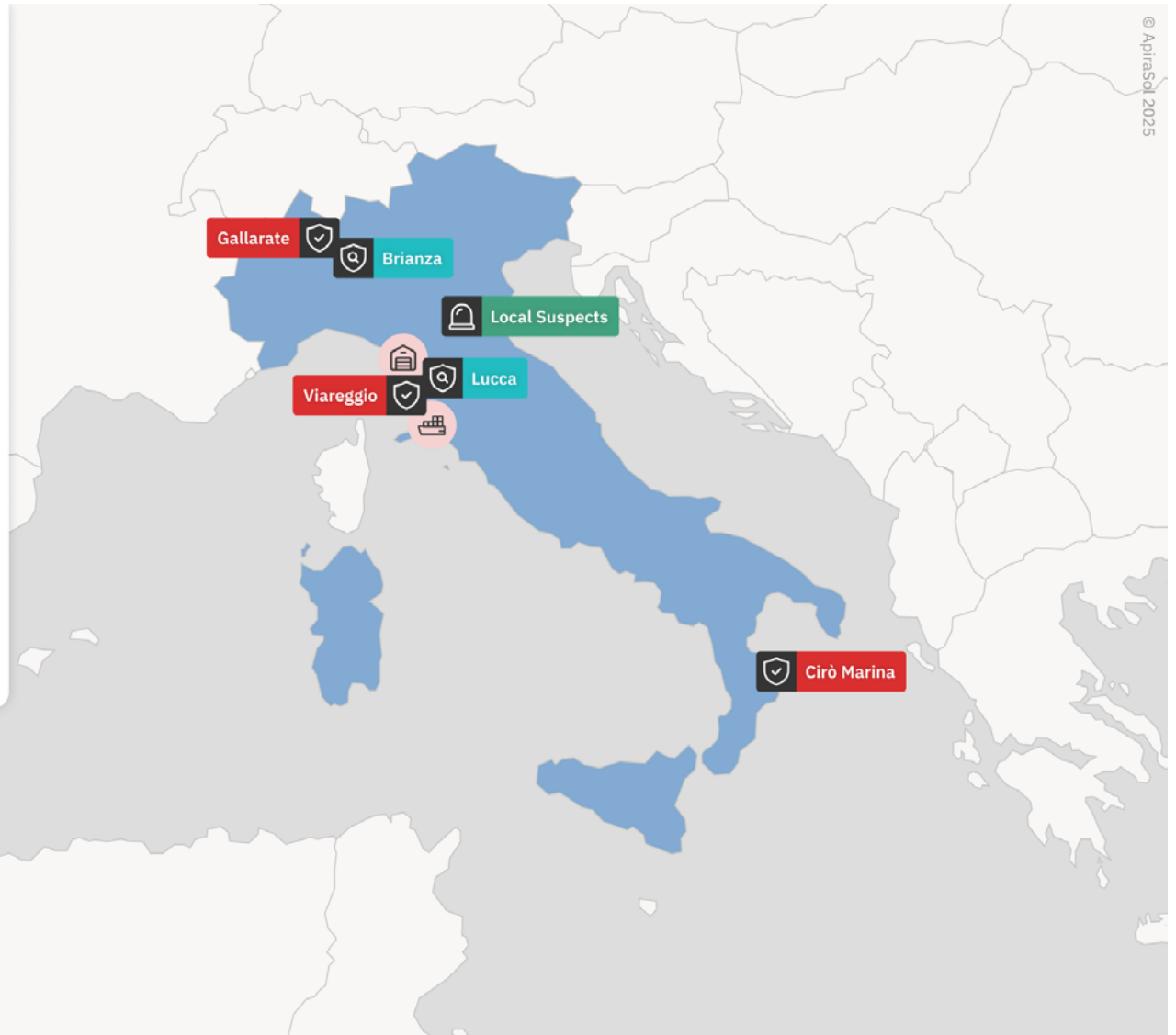


## ITALY ILLCIT TRADE OVERVIEW

Italian authorities have intercepted massive quantities of illegal e-cigarettes and accessories in warehouses and logistics hubs, including in areas such as Viareggio and Gallarate, as well as in other regions across the country. Raids in provinces like Brianza and Lucca have led to the confiscation of millions of products, some non-compliant or aimed at minors, and to the reporting or arrest of local suspects involved in their distribution.

### Legend

-  Seizure
-  Raid
-  Arrest
-  Warehouses
-  Ports
-  ENDS are regulated



In 2025, Italian tax police in Versilia seized more than 50 million illegal e-cigarettes and related smoking products from an unlicensed warehouse and online business.

### Maxi sequestro di oltre 50 milioni di sigarette elettroniche e prodotti accessori al fumo

by Redazione Ore 12 | 27 Settembre 2024 | 0



#### Legend

-  Seizure
-  E-Cigarettes
-  ENDS are regulated

#### Source

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