

ApiraSol

E-CIGARETTES IN KAZAKHSTAN 2024/2025 – Q2

SUPPLY CHAIN INTELLIGENCE
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Overview

1. INTRODUCTION & METHODOLOGY

2. E-CIGARETTE TRADE - RUSSIA AND CENTRAL ASIA

3. E-CIGARETTE TRADE - KAZAKHSTAN

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.

2

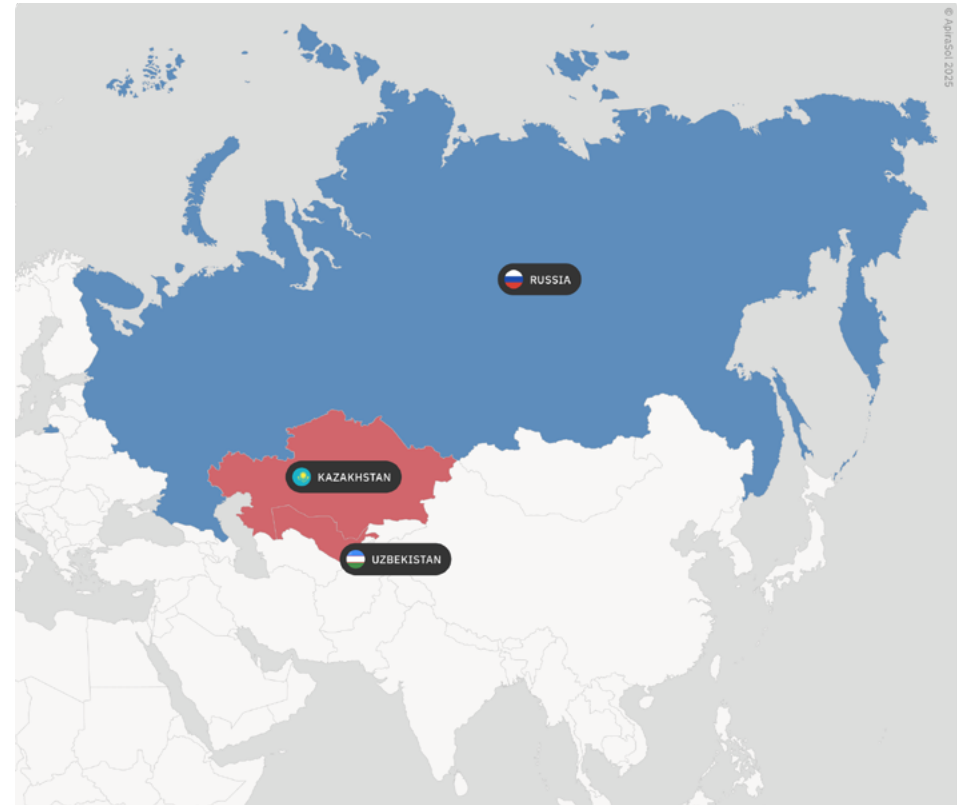
**E-CIGARETTE TRADE -
RUSSIA AND CENTRAL ASIA**

E-Cigarette Trade - Russia and Central Asia

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

The e-cigarette regulatory environment in **Russia and Central Asia** is becoming increasingly restrictive. In **Russia**, e-cigarettes are permitted but subject to stringent controls under Federal Law and related technical standards. Current measures include mandatory licensing for production, storage, import, and retail (effective March 2026), product certification, health warnings, and bans on advertising and online sales. Additional rules impose excise tax hikes, while a nationwide ban on retail sales is under active consideration following proposals supported by the Ministry of Health. In **Central Asia**, the trend is toward prohibition: **Kazakhstan** imposed a full ban on the sale, production, and import of e-cigarettes in 2024, with severe penalties for violations, and **Uzbekistan** followed in 2025 by banning all circulation of e-cigarettes, disposable e-cigarettes, and nicotine pouches. These measures reflect growing concerns over youth uptake, illicit trade, and public health across the region.

Russia is one of China's largest e-cigarette export destinations, with Chinese customs reporting **hundreds of millions of dollars in shipments annually**. While Russia's official statistics import data has not been available since its invasion of Ukraine, the



Russian customs trade data indicates significantly lower imports from China, suggesting that a significant share of these products may enter the market through unrecorded or untaxed channels, fueling illicit trade. In **Kazakhstan**, despite the June 2024 ban, Chinese export data show shipments continuing through late 2024 and into 2025 implying smuggling through informal routes. In **Uzbekistan**, prior to its 2025 ban, declared imports from China exceeded China's reported exports, creating a statistical gap that suggests the country may have served as a transshipment hub.

Given Uzbekistan's strategic location in Central Asia, this pattern indicates that e-cigarettes—both legal and illicit—were likely imported, stored, and then re-exported to neighboring markets. This pattern continued into early 2025, with Chinese customs data still reporting millions of dollars in e-cigarette exports to Uzbekistan, even after the nationwide ban on circulation came into effect.

Illicit e-cigarette trade remains widespread across the region despite bans and strict regulations. Enforcement reports from **Russia** highlight a deeply entrenched black market, with Tamarind Intelligence citing illicit trade levels at around 60%. Recent raids have dismantled illegal production sites and intercepted cross-border shipments sourced from East Asia. In **Kazakhstan**, where Euromonitor estimates illicit e-cigarette penetration to be over 90%, authorities have conducted major operations at border checkpoints and warehouses, uncovering

smuggling networks linked to China and Russia, with the messaging app Telegram being used as a sales channel. **Uzbekistan** has concentrated on disrupting distribution networks in urban and regional hubs, conducting customs inspections and raids in schools and warehouses that resulted in the seizure of thousands of devices. Many of these products are suspected to originate from China and appear intended for redistribution to neighboring countries. These patterns reveal ongoing cross-border smuggling and organized networks exploiting porous borders and bans, fueling a robust underground market.

3

E-CIGARETTE TRADE - KAZAKHSTAN

Summary

In 2024, the statistical gap of \$10.9 million between China's reported e-cigarette exports to Kazakhstan and Kazakhstan's own import figures highlights critical challenges in the reliability and interpretation of trade data. Official trade statistics remain the primary tool for assessing the scale and direction of cross-border flows, yet in this sector, they increasingly fail to capture the true volume and value of goods moving between countries.

Key statistical and trade data issues include:

- **Regulatory Environment:** Ongoing changes to Kazakhstan's import regulations for e-cigarettes and vaping products, including evolving requirements for product registration, labeling, and import licensing, complicate reporting and may cause discrepancies.
- **Re-Routing:** Shipments are often re-routed through third countries, logistics hubs, or regional free zones, obscuring the true origin and final destination. This can inflate or mask actual trade flows and introduce gaps in partner records.
- **Misdeclaration and Evasion:** Exporters and intermediaries may deliberately misdeclare product quantities, values, or HS codes, under-invoicing to reduce taxes or avoid regulatory scrutiny. Such practices make bilateral reconciliation difficult and conceal the real scope of the trade.

- **Incomplete or Delayed Reporting:** Some shipments lack complete data—such as shipment weight or transport mode—hampering transparency and granular reconciliation.
- **Customs Data Limitations:** The almost \$11 million discrepancy reveals inconsistencies in recording, tariff classification, and reporting methodology, complicating any attempt to reconcile bilateral trade flows.
- **Prevalence of Smuggling and Illicit Trade:** The gap is significant enough to suggest that the issue is not merely one of data reliability, but also indicative of potential illicit trade, with products likely entering Kazakhstan through informal or illegal channels that bypass customs oversight and regulatory controls.

Ultimately, Kazakhstan's experience underscores how statistical gaps and market-specific trade data limitations can both mask the scale of the illicit market and limit the effectiveness of regulatory initiatives, highlighting the ongoing need for more integrated, transparent trade monitoring in the region.

Regulatory Overview

Kazakhstan has implemented a full ban on e-cigarettes and related products as part of its intensified efforts to combat nicotine addiction and protect public health. Following amendments

to the “Law on Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on Health Issues, including the Health Code” signed by the President on April 2024, a full prohibition on the importation, production, sale, and distribution of electronic cigarettes, vaping devices, e-liquids, and flavorings came into effect on June 20, 2024. The ban includes non-combustible tobacco products, electronic nicotine delivery systems, and flavored liquids, particularly those exceeding permissible levels of nicotine and tar or failing to meet sanitary standards.

Violations of this ban are subject to severe penalties under the newly introduced Article 301-1 of the Criminal Code. Individuals found selling or distributing prohibited products face fines of up to 200 Monthly Calculation Indexes (MCI), community service, or arrest for up to 50 days. For those involved in importation or manufacturing, penalties escalate to fines of up to 2,000 MCI, confiscation of property, and imprisonment for up to 2 years, with harsher sentences of up to 5 years for repeat or group offenses.

The legislation does not currently allow for regulated sale or use of e-cigarettes, meaning there are no provisions for packaging, advertising, public use, or age restrictions, as the products themselves are banned. This marks Kazakhstan as one of the few countries in the region to adopt a zero-tolerance policy toward vaping, reflecting growing concerns over youth usage and public health risks.

Statistical Data (China as Origin)

China’s declared exports of e-cigarettes to Kazakhstan in 2024 totaled \$25,272,000, while Kazakhstan’s declared imports from China reached \$14,338,000—creating a **discrepancy of approximately \$10.9 million**. This notable gap highlights differences in customs reporting, possible re-routing or transshipment practices, and reflects broader challenges in reconciling bilateral trade statistics for the e-cigarette sector.

Total Value 2024:

- Total Exports from China 2024: \$25,272,000
- Total Imports from China 2024: \$14,338,000
- **Statistical Gap: \$10,934,000**

EXPORTS OF E-CIGARETTES FROM CHINA TO KAZAKHSTAN - 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	KAZAKHSTAN	16,318	676
24041990	Other products containing nicotine substitutes, intended for inhalation without combustion	CHINA	KAZAKHSTAN	0	0
24041910	Other products containing tobacco substitutes, intended for inhalation without combustion	CHINA	KAZAKHSTAN	0	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	KAZAKHSTAN	8,954	5,874
Total:				25,272	6,550

IMPORTS OF E-CIGARETTES TO KAZAKHSTAN 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)
2404120000	Products containing nicotine, intended for inhalation without combustion (excl. containing . . .	CHINA	KAZAKHSTAN	3,420	N/A
2404190001	Products containing tobacco or nicotine substitutes, intended for inhalation without combustion . . .	CHINA	KAZAKHSTAN	0	N/A
2404190009	Products containing tobacco or nicotine substitutes, intended for inhalation without combustion . . .	CHINA	KAZAKHSTAN	0	N/A
8543400000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	KAZAKHSTAN	10,918	N/A
Total:				14,338	-



Exports from China to Kazakhstan

25,272,000

Total 2024 Value (USD)
1H 2025 Value (USD): 6,550,000

Imports to Kazakhstan from China

14,338,000

Total 2024 Value (USD)
1H 2025 Value (USD): N/A

Statistical Data Gap *

10,934,000

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



KAZAKHSTAN

TRADE DATA

The trade data shows that Kazakhstan serves as a key destination for e-cigarette and heated tobacco products mainly sourced from China. Shipments primarily move by air to Astana and Almaty, led by major manufacturers and local distributors. The presence of both global tobacco brands and independent e-cigarette producers indicates a mixed market structure combining regulated and commercial vaping flows, with limited transparency on shipping routes.

Shipments:	1,037 Trade Shipments
Period:	January - December 2024
Origin Countries:	China: 98 %, Indonesia: 2 %
Origin Ports:	Not identified: 98 %, Batam Hang Nadim U: 2 %
Destination Countries:	Kazakhstan
Destination Ports:	Astana: 82 %, Almaty: 11 %, Not identified: 7 %
Products:	Electronic cigarettes, disposable pod devices, smoking devices, etc.
E-Cigarette Brands:	<i>Placeholder text for E-Cigarette Brands</i>
Mode of Transport:	Air: 84 %, Road: 15 %, Unknown: 1 %
Value declared:	61,985,400.33 USD (100 % of shipments)

KAZAKHSTAN

Weight declared:	620,356.68 KG (100 % of shipments)
Number of exporters:	45
Number of importers:	29
Top Exporters:	<i>[Redacted]</i>
Top Importers:	<i>[Redacted]</i>
HS Codes declared in shipments:	<p>240412: Other products containing nicotine, intended for inhalation without combustion (730 shipments)</p> <p>854340: Electronic cigarettes and similar personal electric vaporising devices (307 shipments)</p>



Shipments (Period FY 2024)

1,037 | **61,985,400.33**
Quantity | Value (USD)

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



Destination Ports

- Astana (82 %)
- Almaty (11 %)
- Not identified (7 %)



Origin Ports from China and Indonesia

- Not identified (98 %)
- Batam Hang Nadim U (2 %)

Mode of Transportation

Air: 84 %, Road: 15 %, Unknown: 1 %

E-Cigarette Products

Electronic cigarettes, disposable pod devices, smoking devices, etc.

Legal Brands at Time of Shipment

Blurred text listing legal brands at the time of shipment.

Top Importers

Blurred text listing top importers.

Top Exporters

Blurred text listing top exporters.

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

Kazakh authorities have launched a series of operations targeting illegal e-cigarette trade, with large-scale seizures at vehicle checkpoints, warehouses, and customs posts such as Dostyk and Alakol on the Chinese border. Many shipments originate from China and Russia, with some cases involving trucks and Telegram-based sales networks. Raids in cities like Astana, Almaty, and Pavlodar have uncovered workshops, chemicals, and thousands of devices, reflecting a persistent cross-border smuggling challenge.

Subsequent enforcement measures have focused on dismantling both domestic production workshops and criminal supply networks used for distribution. Notable seizures have included high-value brands and undocumented devices, and authorities have destroyed hundreds of thousands of confiscated vaping products to disrupt grey-market inflows. Intensified coordination among customs, police, and tax service agencies has led to arrests and the exposure of clandestine operations, illustrating the systemic nature of illicit trade and the need for comprehensive oversight.

Kazakhstan's ongoing crackdown underscores its growing role as both a destination and a transit point for illegal e-cigarette products, with sophisticated logistics and digital sales tactics fueling

persistent enforcement challenges. Enhanced regulatory vigilance and cross-agency collaboration remain critical for closing gaps in border control, market documentation, and public health protection.

- **Locations of Seizures:** Major checkpoints (Dostyk, Jiangbulak), Almaty, Astana, and warehouses nationwide.
- **Products Seized:** Hundreds of thousands of illicit e-cigarettes, pods, e-cigarette liquids, and related accessories, destroyed or confiscated in raids.
- **Brands Seized:** [REDACTED], and other major Chinese labels.
- **Methods:** Smuggled in trucks, hidden in warehouses, distributed through informal retail and illegal local production.
- **Enforcement:** Border and police raids, arrests, dismantling of clandestine factories, and widespread product destruction—all stepped up after stricter regulations.



KAZAKHSTAN ILLCIT TRADE OVERVIEW

Kazakh authorities have launched a series of operations targeting illegal e-cigarette trade, with large-scale seizures at vehicle checkpoints, warehouses, and customs posts such as Dostyk and Alakol on the Chinese border. Many shipments originate from China and Russia, with some cases involving trucks and Telegram-based sales networks. Raids in cities like Astana, Almaty, and Pavlodar have uncovered workshops, chemicals, and thousands of devices, reflecting a persistent cross-border smuggling challenge.

Legend



Seizure



Raid



Workshops and Storage Site



Overland Transport



Telegram-Based Sales Network



Illicit Shipment



ENDS are banned



Kazakhstan's Agency for Financial Monitoring (AFM) reported the detention of two trucks arriving from the Russian Federation carrying a large shipment of prohibited products, including 13,000 e-cigarette devices and 2,000 units of e-cigarette liquid. Two individuals were sentenced to six months in prison.

Забитые вейпами грузовики остановили на въезде из России в Казахстан

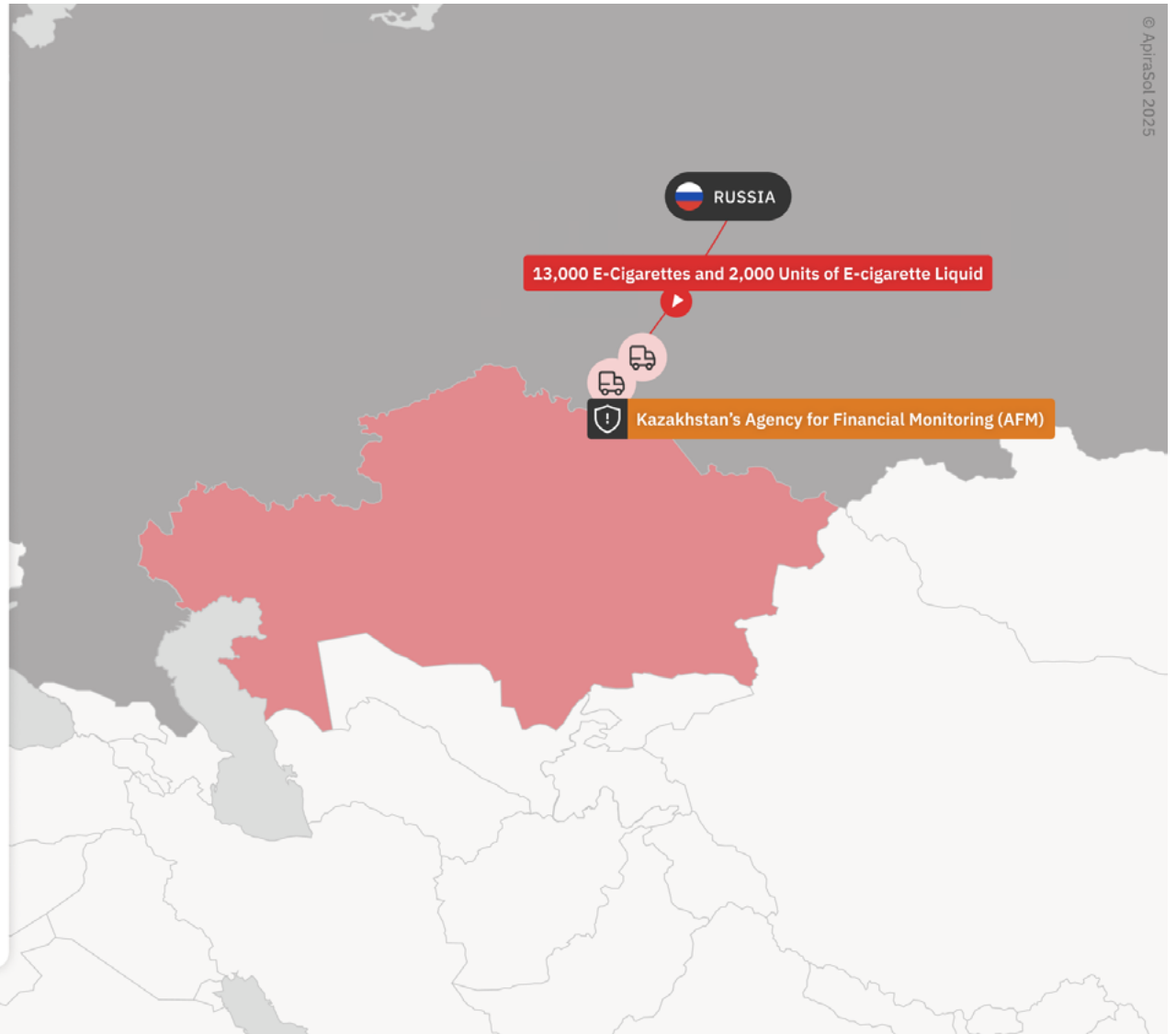


Legend

-  **Interception**
-  **Truck Carrying Prohibited Products**
-  **Illicit Shipment**
-  **ENDS are banned**

Source

<https://www.zakon.kz/sobytiia/6484596-zabitye-veypami-gruzoviki-ostanovili-na-vezde-iz-rossii-v-kazakhstan.html>



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