

ApiraSol

E-CIGARETTES IN MALAYSIA 2024/2025 – Q2

SUPPLY CHAIN INTELLIGENCE
APRIL 2026



Overview

1. INTRODUCTION & METHODOLOGY

2. E-CIGARETTE TRADE - ASIA

3. E-CIGARETTE TRADE - MALAYSIA

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 - ASIA**

E-Cigarette Trade - Asia

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

The e-cigarette landscape across Asia is marked by a diverse and rapidly evolving regulatory environment. Countries like **India, Singapore, Taiwan, Thailand, Vietnam**, and **Hong Kong** have implemented strict bans on the import, sale, and use of e-cigarettes, citing public health concerns and youth protection. Others, such as **Australia, Malaysia, Indonesia** and the **Philippines**, have opted for regulated frameworks, allowing e-cigarettes under specific conditions—often with licensing, age restrictions, and product standards. Meanwhile, **China** and **South Korea** treat e-cigarettes as tobacco products, subjecting them to taxation, licensing, and safety regulations.

In many countries, there is a significant discrepancy between the value of e-cigarettes declared as exported from China and the value reported as imported by the destination country—**often with China’s export figures being much higher**. This statistical gap may indicate the **presence of illicit trade**, where products enter markets without being officially recorded or taxed.

However, in cases like **Singapore** and **Hong Kong**, the opposite trend is observed: declared imports from China exceed China’s reported exports. This suggests these locations may serve as transshipment hubs, where e-cigarettes—both legal and illicit—

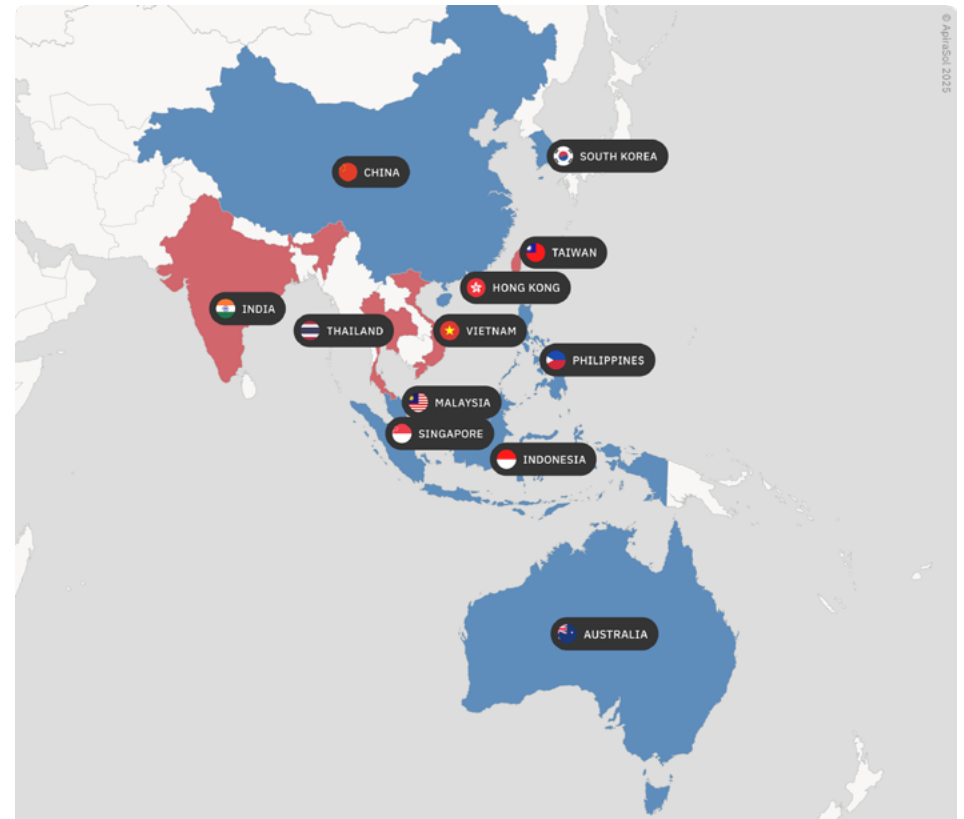
are imported, stored, and re-exported to other countries in the region.

Illicit e-cigarette trade continues to rise across Asia despite regulatory measures. Euromonitor estimates illicit incidence to be at least 60% in Indonesia and Malaysia, and around 80% in South Korea and the Philippines—underscoring the scale and persistence of the problem across the region. Enforcement reports consistently identify China as the main source, with large volumes of unregistered, untaxed, flavored, and high-nicotine devices produced in southern China and smuggled into most neighboring countries.

While most seizures trace directly back to **China**, some cases involve other routes—such as products intercepted in **Indonesia, Singapore, Malaysia**, and **Thailand** coming through Southeast Asian countries, and shipments in **India** linked to Middle Eastern suppliers. These are few compared to the overwhelming volume of China-origin products dominating the market.

Authorities—including customs, health ministries, and anti-smuggling units—have intensified crackdowns, seizing millions of illegal devices and launching awareness campaigns. Yet enforcement gaps and strong consumer demand fuel a thriving underground market, increasingly tied to organized crime. Australia

illustrates how these dynamics can escalate: since 2023, authorities have reported multiple bombing incidents and violent attacks connected to criminal groups involved in illicit tobacco and vaping products. This trend suggests that the illicit e-cigarette trade is not only a regulatory concern but may also pose broader public safety risks as it intersects with organized crime and, in some cases, adulterated or drug laced products.



3

E-CIGARETTE TRADE - MALAYSIA

Summary

Malaysia's e-cigarette trade data for 2024 reveal substantial statistical gaps when compared with export records from supplier countries, particularly China and Indonesia. While exporter data suggest significant volumes and values shipped to Malaysia, Malaysia's own import statistics consistently reflect much lower figures. This persistent gap can be attributed to several interrelated factors:

- **Regulatory Environment:** Malaysia permits regulated import, sale, and use of e-cigarettes, but frequent amendments and enforcement complexities create uncertainty and loopholes. Periodic crackdowns and changing requirements for licensing, product registration, and taxation result in evasion, fragmented compliance, and unreported flows—further widening the statistical gap.
- **Re-routing:** A considerable share of e-cigarette shipments are routed through third countries such as Taiwan and Thailand before reaching Malaysia. Taiwanese companies, including logistics and trading firms, appear as top importers in trade records, obscuring the true origin and bypassing direct customs scrutiny. This routing complicates origin identification and distorts bilateral trade numbers.
- **Misdeclaration and evasion:** E-cigarette products may be declared under unrelated HS codes, misrepresented as other goods, or split into smaller consignments by intermediaries to

avoid regulatory detection and minimize taxes.

- **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 Malaysia and its trading partners exacerbate discrepancies, making reconciliation of bilateral trade figures challenging.
- Data Transparency Gaps:** With China not making detailed customs export data public and indirect shipments through Taiwan and Indonesia, logistical traceability and transparency are further undermined.
- **Prevalence of Smuggling and Illicit Trade:** Smuggling syndicates exploit local and regional networks to move products covertly across borders, using methods such as bonded trucks, concealed storage sites, and informal facilitation to avoid detection. These tactics allow large shipments to bypass formal reporting channels and reduce the likelihood of interception by enforcement agencies.

Enforcement actions confirm these trends, with Malaysian authorities intercepting illicit shipments at major ports, border crossings, and within local supply hubs. The identified role of Taiwanese intermediaries in import records, combined with the widespread use of covert channels, highlights both the complexi-

ty of e-cigarette trafficking in Southeast Asia and the urgent need for improved cross-border data sharing, coordinated enforcement, and regulatory harmonization.

Regulatory Overview

Malaysia implemented a comprehensive regulatory framework for vaping products starting October 1, 2024, under the Control of Smoking Products for Public Health Act 2024. Initially, the government considered strict measures such as banning flavors and enforcing plain packaging, but ultimately opted for more moderate restrictions.

The Ministry of Health or Tobacco Control Unit under Ministry of Health, are responsible for regulatory oversight. This includes mandatory laboratory testing of all e-cigarette variants for nicotine concentration, prohibited additives, and compliance with approved product standards.

Sales and distribution are tightly regulated. E-cigarettes cannot be sold through self-service machines, near schools and educational institutions (within 40 meters), or in any form of online channels. Packaging must include graphic health warnings, while advertising and promotional activities are prohibited across all media platforms. Excise taxes apply to nicotine-containing liquids, and product packaging weight and volume limits are enforced to reduce youth appeal and strengthen market controls.

Statistical Data (China as Origin)

China's declared exports of e-cigarettes to Malaysia in 2024 totaled \$384,509,296, while Malaysia's declared imports from China reached \$31,785,000—creating a discrepancy of approximately \$352.7 million. This significant statistical gap may be explained by misdeclaration of goods, transshipment activities through third countries, underreporting to evade taxes or regulatory barriers, and differences in customs practices or reporting periods. The discrepancy highlights the likelihood of large-scale informal or illicit trade, as well as potential vulnerabilities in trade monitoring and enforcement between the two countries.

Total Value 2024:

- Total Exports from China 2024: \$384,509,296
- Total Imports from China 2024: \$ 31,785,000
- **Statistical Gap: \$352,724,296**

Statistical Data (Indonesia as Origin)

Indonesia's reported exports of e-cigarettes to Malaysia in 2024 amounted to \$90,000 while Malaysia registered \$1,008,000 in imports from Indonesia, highlighting a considerable statistical discrepancy of \$918,000. This considerable statistical discrepancy suggests that e-cigarette shipments from Indonesia to Malaysia may be underreported at origin, over-invoiced at destination, or subject to re-routing and misdeclaration. Differences in customs practices, reporting timelines, and possible involvement

of third-country intermediaries may also contribute to these mismatched figures, reflecting underlying complexities and potential vulnerabilities in the bilateral trade monitoring process.

Total Value 2024:

- Total Exports from Indonesia 2024: \$ 90,000
- Total Imports from Indonesia 2024: \$1,008,000
- **Statistical Gap: \$ 918,000**

EXPORTS OF E-CIGARETTES FROM CHINA TO MALAYSIA - 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	MALAYSIA	329,953	151,952
24041990	Other products containing nicotine substitutes, intended for inhalation without combustion	CHINA	MALAYSIA	707	386
24041910	Other products containing tobacco substitutes, intended for inhalation without combustion	CHINA	MALAYSIA	0	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	MALAYSIA	53,849	18,389
Total:				384,509	170,727

IMPORTS OF E-CIGARETTES TO MALAYSIA 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)
2404121000	Products containing nicotine, intended for inhalation without combustion (excl. containing . . .	CHINA	MALAYSIA	26,566	N/A
2404192000	Products containing tobacco or nicotine substitutes, intended for inhalation without combustion . . .	CHINA	MALAYSIA	227	N/A
8543400000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	MALAYSIA	4,992	N/A
Total:				31,785	-

EXPORTS OF E-CIGARETTES FROM INDONESIA TO MALAYSIA - 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)
24041210	E-cigarette liquid or gel	INDONESIA	MALAYSIA	68	1
24041290	Products intended for inhalation without combustion, containing nicotine, other than e-cigarette . . .	INDONESIA	MALAYSIA	4	0
24041910	Products intended for inhalation without combustion, containing tobacco substitutes	INDONESIA	MALAYSIA	5	0
24041920	Products intended for inhalation without combustion, containing nicotine substitutes	INDONESIA	MALAYSIA	0	0
85434000	Electronic cigarettes and similar personal electric vaporising devices	INDONESIA	MALAYSIA	13	868
Total:				90	869

IMPORTS OF E-CIGARETTES TO MALAYSIA FROM INDONESIA - 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)
2404121000	Products containing nicotine, intended for inhalation without combustion (excl. containing . . .	INDONESIA	MALAYSIA	3	N/A
2404192000	Products containing tobacco or nicotine substitutes, intended for inhalation without combustion . . .	INDONESIA	MALAYSIA	N/A	N/A
8543400000	Electronic cigarettes and similar personal electric vaporizing devices	INDONESIA	MALAYSIA	1,005	N/A
Total:				1,008	-

 **MALAYSIA**
STATISTICAL DATA



Exports from China to Malaysia

384,509,296

Total 2024 Value (USD)
1H 2025 Value (USD): 170,727,000

Imports to Malaysia from China

31,785,000

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

Statistical Data Gap *

352,724,296

Exports from Indonesia to Malaysia

90,000

Total 2024 Value (USD)
1H 2025 Value (USD): 869,000

Imports to Malaysia from Indonesia

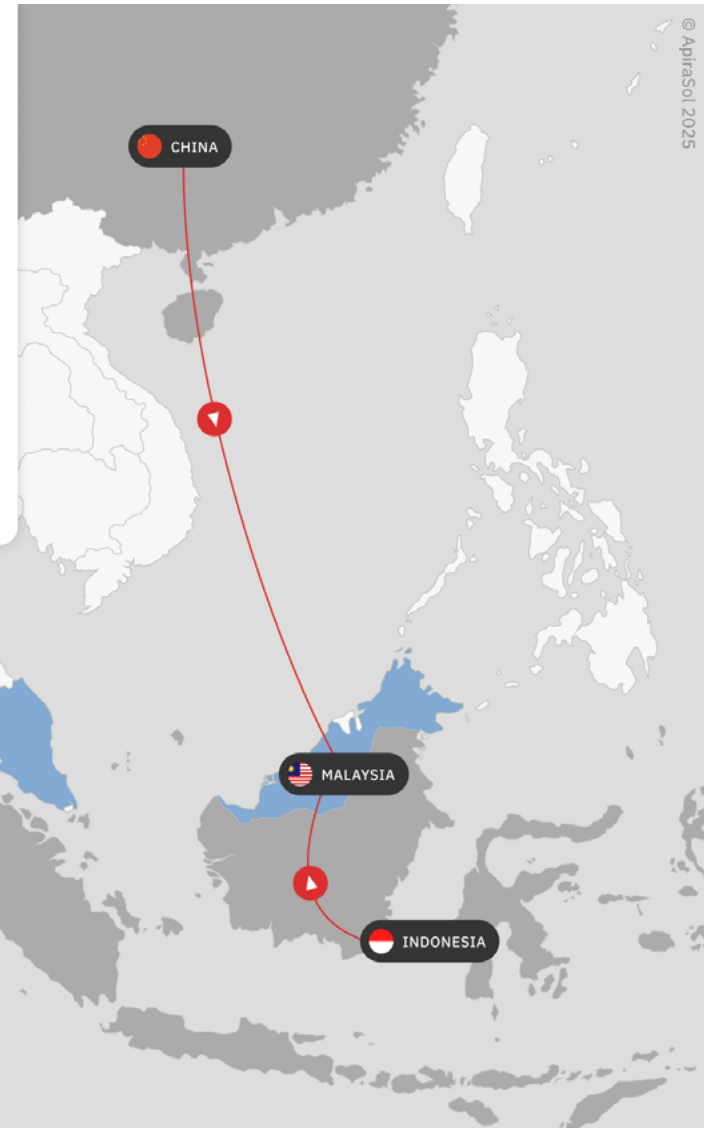
1,008,000

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

Statistical Data Gap *

-918,000

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



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MALAYSIA

TRADE DATA (MIRRORED DATA FROM INDONESIA)

The 2024 trade data shows active e-cigarette shipments from Indonesia to Malaysia, including diverse brands and products across multiple ports. However, the lack of documented direct trade from China—despite its status as a major manufacturer—is partly due to China not making detailed customs export data publicly available. This, combined with possible transshipment and reclassification through Indonesia, contributes to persistent gaps in trade transparency and complicates accurate tracking of supply chain origins in the regional e-cigarette market.

Shipments:	100 Trade Shipments
Period:	January - December 2024
Origin Countries:	Indonesia
Origin Ports:	Cengkareng Soekarno Hatta U: 45 %, Surabaya Juanda U: 30%, Batu Ampar: 23 %, Tanjung Priok: 1 %, Denpasar Ngurah Rai U: 1 %
Destination Countries:	Malaysia
Destination Ports:	Kuala Lumpur: 77 %, Pasir Gudang Johor: 9 %, Singapore: 7 %, Port Kelang: 7 %
Products:	Pods, disposable e-cigarettes, e-liquid cartridges, etc.
E-Cigarette Brands:	<i>[Blurred text]</i>

MALAYSIA

Mode of Transport:	Unknown
Value declared:	957,998.07 USD (100 % of shipments)
Weight declared:	10,424.67 KG (100 % of shipments)
Number of exporters:	10 (The exporters' names were not declared in 6 shipments)
Number of importers:	12
Top Exporters:	[REDACTED]
Top Importers:	[REDACTED]
HS Codes declared in shipments:	<p>240412: Other products containing nicotine, intended for inhalation without combustion (60 shipments)</p> <p>854340: Electronic cigarettes and similar personal electric vaporising devices (26 shipments)</p> <p>240419: Other products intended for inhalation without combustion (14 shipments)</p>



MALAYSIA TRADE DATA (Mirrored Data from Indonesia)



Shipments (Period FY 2024)

100

Quantity

957,998.07

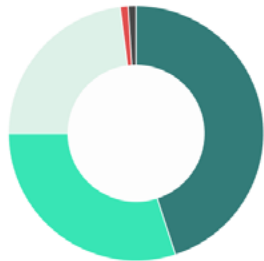
Value (USD)

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



Destination Ports

- Kuala Lumpur (77 %)
- Pasir Gudang Johor (9 %)
- Singapore (7 %)
- Port Kelang (7 %)
- Other ports (3 %)



Origin Ports from Indonesia

- Cengkareng Soekarno Hatta U (45 %)
- Surabaya Juanda U (30 %)
- Batu Ampar (23 %)
- Tanjung Priok (1 %)
- Denpasar Ngurah Rai U (1 %)

Mode of Transportation

Unknown

E-Cigarette Products

Pods, disposable e-cigarettes, e-liquid cartridges, etc.

Legal Brands at Time of Shipment

Unknown

Top Importers

Unknown

Top Exporters

Unknown

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

Malaysian enforcement teams have seized illegal e-cigarette shipments at key entry points such as Port Klang, the North Butterworth Container Terminal, and areas along the Thai border. Many of the intercepted products originate from China and Thailand, with some cases involving drug-laced e-cigarette liquids processed in local laboratories. Raids have targeted warehouses, bonded trucks, and residential units, revealing the involvement of organized networks and highlighting gaps that enforcement agencies continue to address.

These actions reveal the sophistication and reach of organized smuggling groups, who use maritime, land, and air routes to channel large quantities of e-cigarette devices and liquids into Malaysia for domestic sale and regional re-export, particularly to Singapore. Investigations uncovered instances of customs officers taking bribes to facilitate illegal container clearance, highlighting compliance gaps and the need for integrity in enforcement.

Further, the discovery of locally operated drug labs manufacturing amphetamine and cocaine-laced e-cigarette products underscores a growing public health risk. Enforcement teams have dismantled these operations, arresting international chemists and seizing millions of ringgit in contraband.

Overall, the recurrent seizures and enforcement actions underscore

both the challenges and the progress in Malaysia's efforts to curb illicit vaping products and related criminal activity. Strengthened inter-agency cooperation, stricter cargo inspections, and continued initiatives to enhance oversight within the supply chain remain essential to reducing the flow of illegal e-cigarette goods and supporting more effective regulatory control.

- **Locations of seizures:** Seizures in Rantau Panjang (Kelantan border), Penang, Port Klang, and Brickfields (Kuala Lumpur condo drug lab).
- **Products seized:** Confiscated 900+ e-cigarette devices, hundreds of bottles of e-cigarette liquid (some amphetamine-laced), and hundreds of thousands of e-cigarettes in large shipments. Seized goods include suspected contraband from Thailand and products meant for Singapore.
- **Methods:** Smuggling by car through illegal jetties, bulk shipments routed via ports, use of concealed containers, and even illicit drug manufacturing in condos.
- **Scale & Value:** Major operations netted RM221,500, RM5.17 million (Penang), RM329 million (drug lab raid), and up to 300,000 e-cigarettes per shipment.
- **Agency Actions & Trends:** Police, customs, and anti-drug agencies have arrested syndicate members, disrupted attempts to evade enforcement, and destroyed seized illicit products. Cross-border networks and specialized chemists have been implicated in higher value cases, reflecting the increasingly sophisticated methods used by trafficking groups.



MALAYSIA ILLICIT TRADE OVERVIEW

Malaysian enforcement teams have seized illegal e-cigarette shipments at Port Klang, North Butterworth Container Terminal, and along the Thai border. Products often originate from China and Thailand, with some cases involving drug-laced e-cigarette liquids processed in local labs. Raids have targeted warehouses, bonded trucks, and condominiums, exposing both syndicates and corrupt officials.

Legend



Seizure



ENDS are regulated





In July 2025, Malaysian Customs seized 300,000 e-cigarettes hidden as furniture in a misdeclared shipment from China at Port Klang, believed destined for Singapore via maritime trafficking routes.

300,000 vapes seized in Malaysia's Port Klang believed to be headed for Singapore

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Legend



Seizure



ENDS are regulated



Illicit Shipment

Source

<https://www.straitstimes.com/singapore/courts-crime/300000-vapes-seized-in-port-klang-believed-to-be-headed-to-singapore>



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Contact us

ApiraSol GmbH

Pappelallee 78

10437 Berlin, Germany

+49 3023 61 60 22

info@apirasol.com

www.apirasol.com