

# ApiraSol

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

---

SUPPLY CHAIN INTELLIGENCE  
APRIL 2026



# Overview

---

1. INTRODUCTION & METHODOLOGY

---

2. E-CIGARETTE TRADE - LATIN AMERICA

---

3. E-CIGARETTE TRADE - MEXICO

---

**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  
LATIN AMERICA**

# E-Cigarette Trade - Latin America

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

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

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



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

# 3

## E-CIGARETTE TRADE - MEXICO

# Summary

In 2024, China's official data recorded \$26.37 million in e-cigarette exports to Mexico, while Mexico reported imports from China amounting to only \$2.40 million. This created a statistical gap of approximately \$23.97 million, highlighting notable inconsistencies in the reported trade flows.

- **Regulatory Environment:** Mexico has implemented a nationwide ban on the production, marketing, and importation of e-cigarettes, which limits the presence of officially documented imports and encourages alternative, often informal, trade channels.
- **Re-Routing:** Many shipments are redirected through third countries or neighboring nations, or use indirect logistics to enter Mexico, complicating identification of the true trade flow in official statistics.
- **Misdeclaration and Evasion:** Shipments may be disguised as other consumer goods or components, misdeclared to avoid regulatory scrutiny and interception at customs.
- **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 Mexico and its trading partners exacerbate discrepancies, making reconciliation of bilateral trade figures challenging.

- **Prevalence of Smuggling and Illicit Trade:** A robust and adaptive black market continues to supply e-cigarettes despite the ban, relying on clandestine distribution networks operating parallel to formal supply chains.

These factors together explain the substantial statistical gap observed in 2024 and underscore the challenges of monitoring and enforcing e-cigarette trade regulations in the current Mexican market context.

## Regulatory Overview

Mexico currently enforces a strict regulatory stance on e-cigarettes, with a total ban on their importation, advertisement, sale, distribution, and use, regardless of nicotine content. This prohibition is grounded in the General Health Law, which has been progressively strengthened over the years. The most recent reform was submitted to the Chamber of Deputies on September 26, 2025, by President Claudia Sheinbaum, which expanded the scope of the law to include a complete prohibition of e-cigarette devices and electronic cigarettes, as well as other analogous systems. The proposed amendments aim to criminalize the commercial handling of e-cigarettes—including their production, packaging, transportation, and sale—with prison sentences ranging from one to eight years. Additionally, individuals involved in advertising

or promoting these products would face similar penalties. These measures reflect Mexico's commitment to protecting public health, particularly among youth, and addressing the risks associated with nicotine addiction and unregulated vaping products.

## Statistical Data (China as Origin)

China's declared exports of e-cigarettes to Mexico in 2024 totaled \$26,371,000, while Mexico's declared imports from China reported \$2,403,000—creating a **discrepancy of approximately \$23.97 million**. This statistical gap highlights issues such as possible underreporting, misdeclaration, re-routing of shipments, and the influence of Mexico's regulatory environment—which may drive a large portion of trade into unrecorded or illicit channels, complicating accurate monitoring of e-cigarette flows between the two countries.

### Total Value 2024:

- Total Exports from China 2024: \$26,371,000
- Total Imports from China 2024: \$2,403,000
- **Statistical Gap: \$23,968,000**

## EXPORTS OF E-CIGARETTES FROM CHINA TO MEXICO - 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	MEXICO	14,513	28
24041990	Other products containing nicotine substitutes, intended for inhalation without combustion	CHINA	MEXICO	97	0
24041910	Other products containing tobacco substitutes, intended for inhalation without combustion	CHINA	MEXICO	0	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	MEXICO	11,761	68
<b>Total:</b>				<b>26,371</b>	<b>96</b>

## IMPORTS OF E-CIGARETTES TO MEXICO 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	MEXICO	N/A	N/A
24041990	Products containing nicotine substitutes, intended for inhalation without combustion (excl. . . .	CHINA	MEXICO	N/A	N/A
24041910	Products containing tobacco substitutes, intended for inhalation without combustion (excl. . . .	CHINA	MEXICO	N/A	N/A
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	MEXICO	2,403	N/A
<b>Total:</b>				<b>2,403</b>	<b>-</b>

 **MEXICO**  
STATISTICAL DATA



Exports from China to Mexico

**26,371,000**

Total 2024 Value (USD)  
1H 2025 Value (USD): 96,000

Imports to Mexico from China

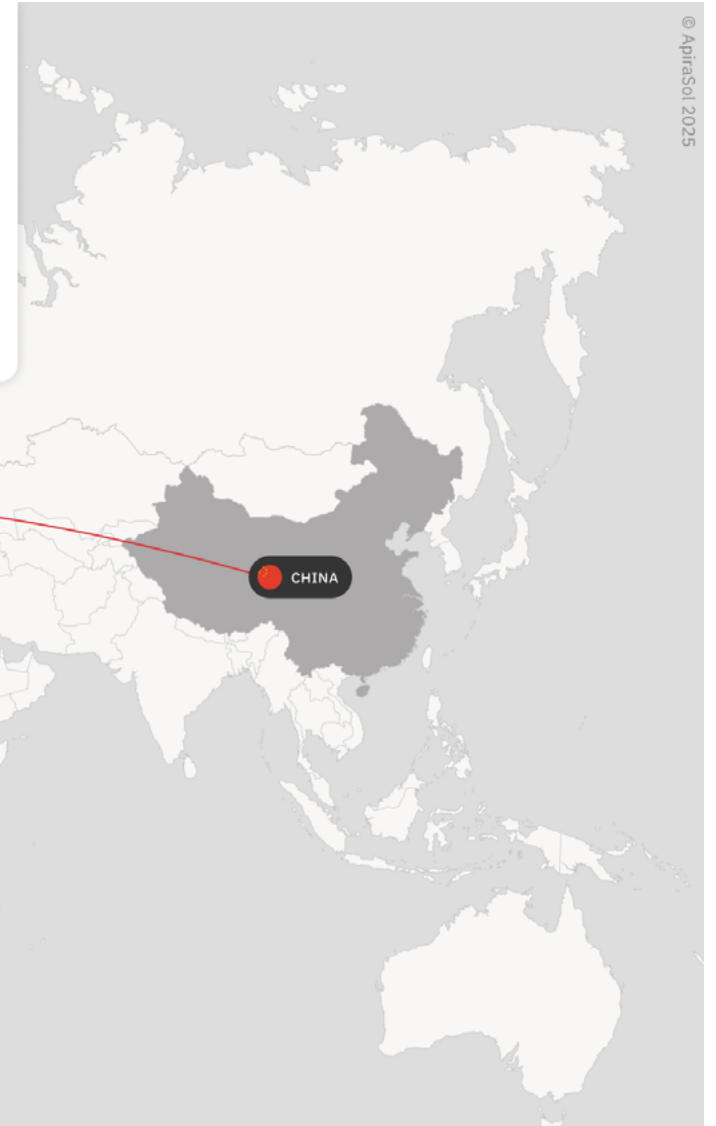
**2,403,000**

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

Statistical Data Gap \*

**23,968,000**

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



© ApiraSol 2025

# MEXICO

## TRADE DATA

The 2024 trade flows of e-cigarette and e-cigarette shipments from China to Mexico reflect a dynamic and diverse market landscape. Shipments enter through multiple key entry points across several Mexican states, with products described broadly as electronic nicotine delivery systems and devices for vaporizing liquid. These goods move by various modes of transport—including sea, land, and air—illustrating the flexibility and reach of supply networks in this sector. The widespread movement across ports and transport methods underscores the continued relevance and complexity of cross-border e-cigarette trade between China and Mexico.

<b>Shipments:</b>	<b>872 Trade Shipments</b>
Period:	January - December 2024
Origin Countries:	China
Origin Ports:	Not declared
Destination Countries:	<b>Mexico</b>
Destination Ports:	Not declared: 43 %, Colombia Nuevo León: 30%, Manzanillo Colima: 25 %, Guadalajara Tlajomulco De Zúñiga Jalisco: 1 %, Nuevo Laredo Nuevo Laredo Tamaulipas: 1 %
Products:	<b>Electronic nicotine delivery systems, devices for vaporizing liquid (e-cigarettes)</b>
E-Cigarette Brands:	<b>[REDACTED]</b>
Mode of Transport:	Sea: 38 %, Land: 30 %, Truck Flights: 30 %, Air: 2 %

## MEXICO

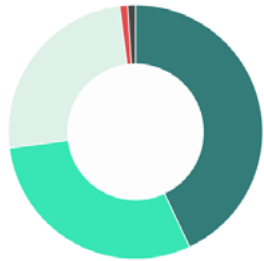
Value declared:	<b>114,680,183.80 USD</b> (100 % of shipments)
Weight declared:	2,784,745.74 KG (100 % of shipments)
Number of exporters:	3 (No exporters' names were declared in 382 shipments)
Number of importers:	3 (No importers' names were declared in 276 shipments)
Top Exporters:	[REDACTED]
Top Importers:	[REDACTED]
HS Codes declared in shipments:	<b>240412:</b> Other products containing nicotine, intended for inhalation without combustion (28 shipments) <b>854340:</b> Electronic cigarettes and similar personal electric vaporising devices (844 shipments)



Shipments (Period FY 2024)

**872** | **114,680,183.80**  
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**

- Not declared (43 %)
- Colombia Nuevo León (30 %)
- Manzanillo Colima (25 %)
- Guadalajara Tlajomulco De Zúñiga Jalisco (1 %)
- Nuevo Laredo Nuevo Laredo Tamaulipas (1 %)

**Mode of Transportation**

Sea: 38 %, Land: 30 %, Truck Flights: 30 %, Air: 2 %

**E-Cigarette Products**

Electronic nicotine delivery systems, devices for vaporizing liquid (e-cigarettes)

**Legal Brands at Time of Shipment**

**Top Importers**

**Top Exporters**

**Origin Ports from China**

Not declared

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

Mexican authorities have intensified crackdowns on illegal e-cigarette products, seizing thousands of devices in shopping malls, warehouses, and universities, particularly in Mexico City. Smuggling networks, linked to cartels and sometimes Asian groups, move goods between clandestine storage sites and established sales networks, including private universities. Shipments are concealed within clothing or everyday items, and enforcement operations have uncovered cannabis-infused e-cigarettes and mafia controlled supply routes, aligning with reports that cartels increasingly mark their own e-cigarette ‘brands’ to assert control. A vigorous, multi-agency crackdown—including customs, finance, and security authorities—has resulted in large scale seizures in commercial hubs and warehouses such as Plaza Izazaga and the Tepito neighborhood, exposing deeply entrenched black market infrastructure supplying both formal retail shops and informal urban centers. Illicit e-cigarettes now represent major revenue streams for at least seven cartels, reflecting how prohibition has strengthened organized crime rather than reduced demand. Reports further indicate that cartels are exploiting the vacuum left by shuttered legal businesses, using extortion, intimidation, and violence to dominate the production and distribution of e-cigarettes.

- **Locations of seizures:** Mexico City (notably Plaza Izazaga in the Centro Histórico, warehouses in Tepito), shopping malls, universities, and clandestine storage sites.
- **Products Seized:** Thousands of e-cigarettes and e-cigarette devices, including cannabis-infused e-cigarettes.
- **Brands Seized:** Multiple brands; enforcement news often does not disclose specific names, indicating a diverse illicit product mix.
- **Methods:** Smuggling networks use concealment strategies such as disguising shipments as clothing or everyday items; distribution through retail stores, informal markets, and even private universities; mafia-linked and Asian-associated networks have been identified.
- **Enforcement:** Major operations by the Secretariat of Citizen Security (SSC), the Secretariat of Administration and Finance (SAF), and other agencies; intensified raids, seizures, and ongoing efforts to disrupt mafia and organized crime-controlled distribution networks.

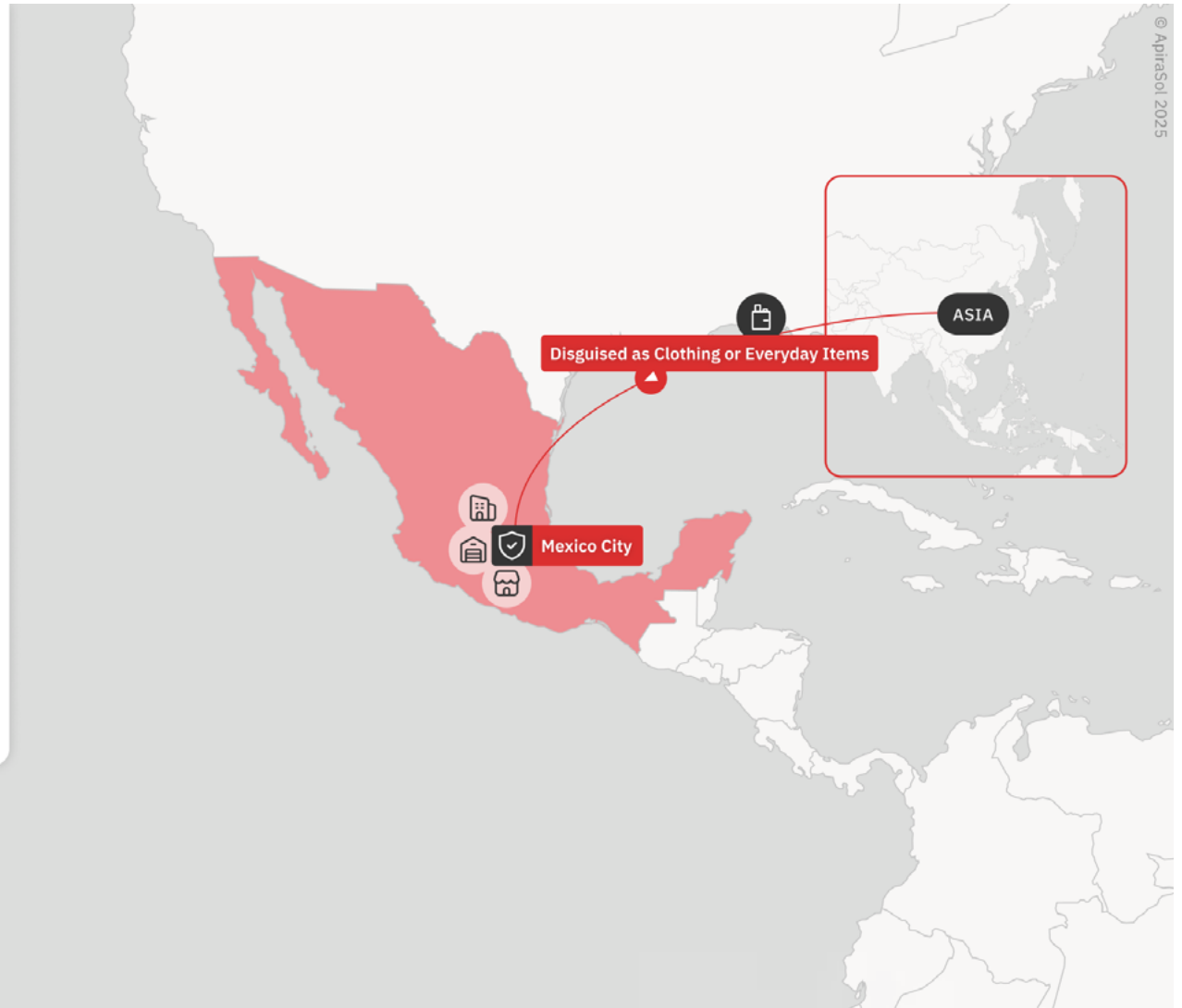


## MEXICO ILLCIT TRADE OVERVIEW

Mexican authorities have intensified crackdowns on illegal e-cigarette products, seizing thousands of devices in shopping malls, warehouses, and universities, particularly in Mexico City. Smuggling networks, sometimes linked to Asian groups, move goods between clandestine storage sites and established sales networks, including private universities. Some shipments are disguised as clothing or everyday items, and enforcement actions have also uncovered cannabis-infused e-cigarettes and mafia-controlled distribution.

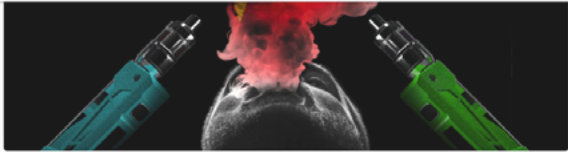
### Legend

- Seizure
- Shopping Malls
- Warehouses
- Universities
- Asia-Origin Illegal E-cigarettes
- Illicit Shipment
- ENDS are banned



© ApiraSol 2025

Mexico's e-cigarette ban has led to a thriving black market controlled by Chinese, Korean, and Italian groups. These networks smuggle large quantities of e-cigarettes—sometimes up to 50,000 devices per shipment—often disguised as clothing or other goods, and distribute both nicotine and THC products in universities and clandestine warehouses, mainly targeting young people.



Sergio Rincón y Enrique Alvarado González (colaboración especial)

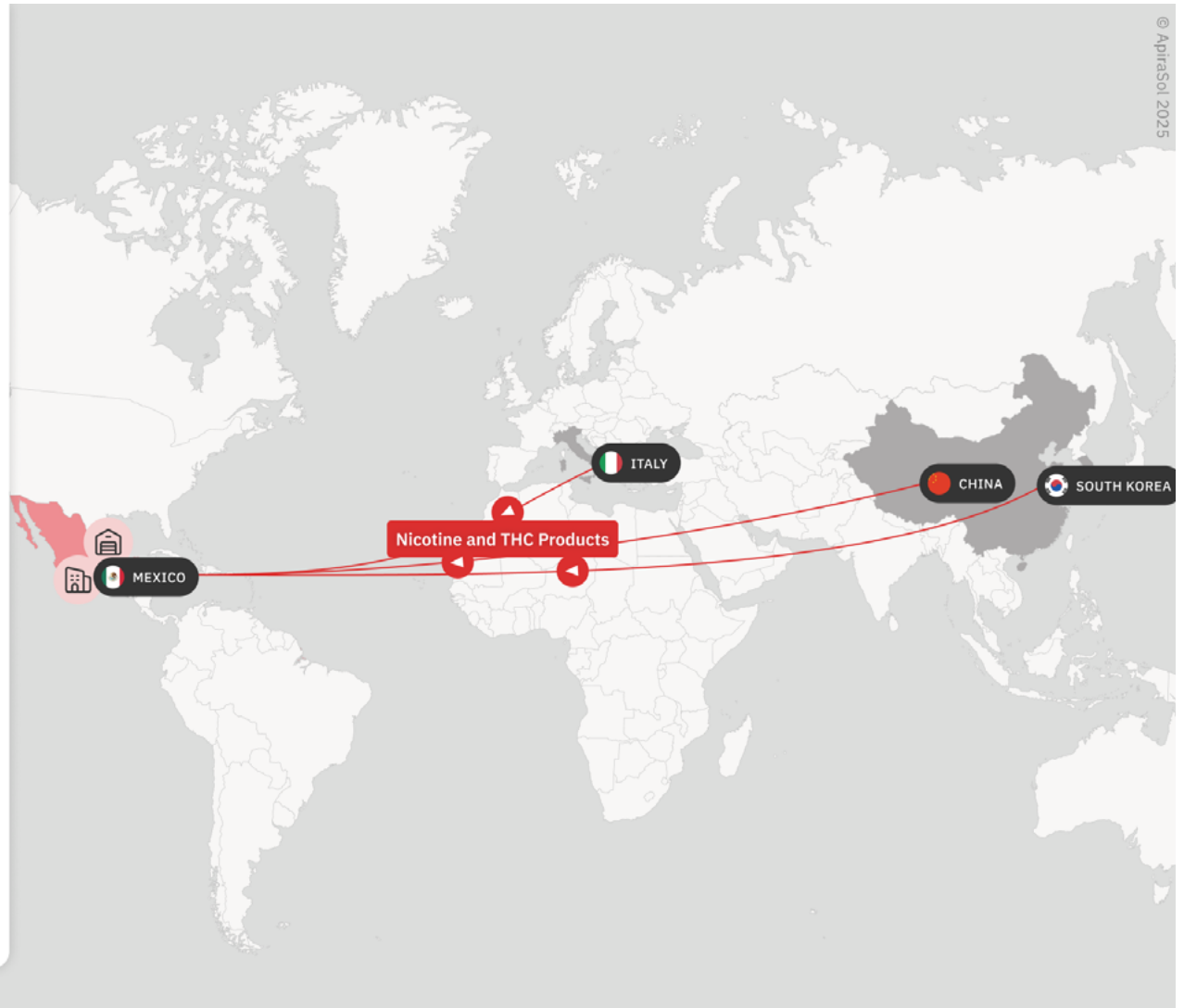
## Así operan las mafias del mercado negro de vapeadores en CDMX

### Legend

-  Clandestine Warehouses
-  Universities
-  ENDS are banned

### Source

<https://elceo.com/investigaciones-especiales/asi-peran-las-el-mercado-negro-de-vapeadores-en-cdmx/>



# References

- [Euromonitor International: More than 75% of global e-vapor volume is driven by illicit market – The Media Pub News™](#)
- [Over 75% of global e-vapour volume is driven by illicit market: Euromonitor International - The Daily Brit](#)
- [Navigating the E-Vapour Market and the Growth of Illicit Products - Euromonitor.com](#)
- [Illicit e-vapour market booms - Tobacco Journal International](#)
- [Legal vs Illicit E-Vapour Products in the Middle East: A Closer Look - Euromonitor.com](#)
- [Market and legal information in the e-cigarette and vaping sector](#)
- [Tamarind Intelligence Podcast: The Illicit Vape Problem](#)
- [Episode 1: The Illicit Vape Problem - Tamarind Intelligence Podcast | Podcast on Spotify](#)
- [Enforcement tracker: authorities across globe break records in illicit vape seizures - ECigIntelligence](#)
- [Illicit Vape Market Undermines Global Tobacco Harm Reduction Progress - allAfrica.com](#)
- [Announcement of the State Tobacco Monopoly Administration \(No. 1 of 2022\) Administrative Measures for E-cigarettes Official Gazette of the State Council No. 18 of 2022 Chinese Government Website](#)
- [China-Admin.-Rules-for-E-Cigarette-Import-Export.pdf](#)
- [WHO report on the global tobacco epidemic, 2025: warning about the dangers of tobacco, June 2025](#)
- [Countries Banning E-Cigarette Sales | Ecigator](#)
- [Regulation E-Cigarettes | Tobacco Insider](#)
- [Analysis of Vape Bans and Regulatory Policies in Various Countries | Vape Observation](#)
- [China Customs Statistics Portal](#)
- [Trade Map \(International Trade Centre\)](#)
- [Mexico Nationwide Ban on E-Cigarettes – Ecigator](#)
- [Mexico Implements Nationwide Ban on E-Cigarettes – Sada Elbalad](#)
- [Vape bans and cartels: security implications of Mexico’s policy](#)
- [AP News: Mexico’s vaping cartels and links to China and organized crime](#)
- [New Mexican study confirms that prohibition does not work](#)
- [Mexico’s vaping ban: a gift to cartels](#)
- [Humo, vapeo y poder \(report on vaping, politics, and power\)](#)
- [DT-2025-3: Colmex discussion paper on illicit markets and vaping](#)

# Enforcement news sources

- [Golpe a vapeadores y cigarros electrónicos: decomisaron miles de piezas en Plaza Izazaga de la CDMX – Infobae](#)
- [Mexican authorities seize huge quantity of illegal e-cigarettes – 2FIRSTS](#)
- [AGEPSA decomisa vapeadores en CDMX – Consultor Salud](#)
- [Así operan las el mercado negro de vapeadores en CDMX – EL CEO](#)
- [Decomisan productos ilícitos en bodega de Tepito: cigarros, tenis, medicamentos y vapeadores – Latinus](#)
- [K Street @ 10,000 feet: Inhaling the ... – Washington Reporter](#)

## Contact us

---

**ApiraSol GmbH**

Pappelallee 78

10437 Berlin, Germany

+49 3023 61 60 22

info@apirasol.com

**www.apirasol.com**