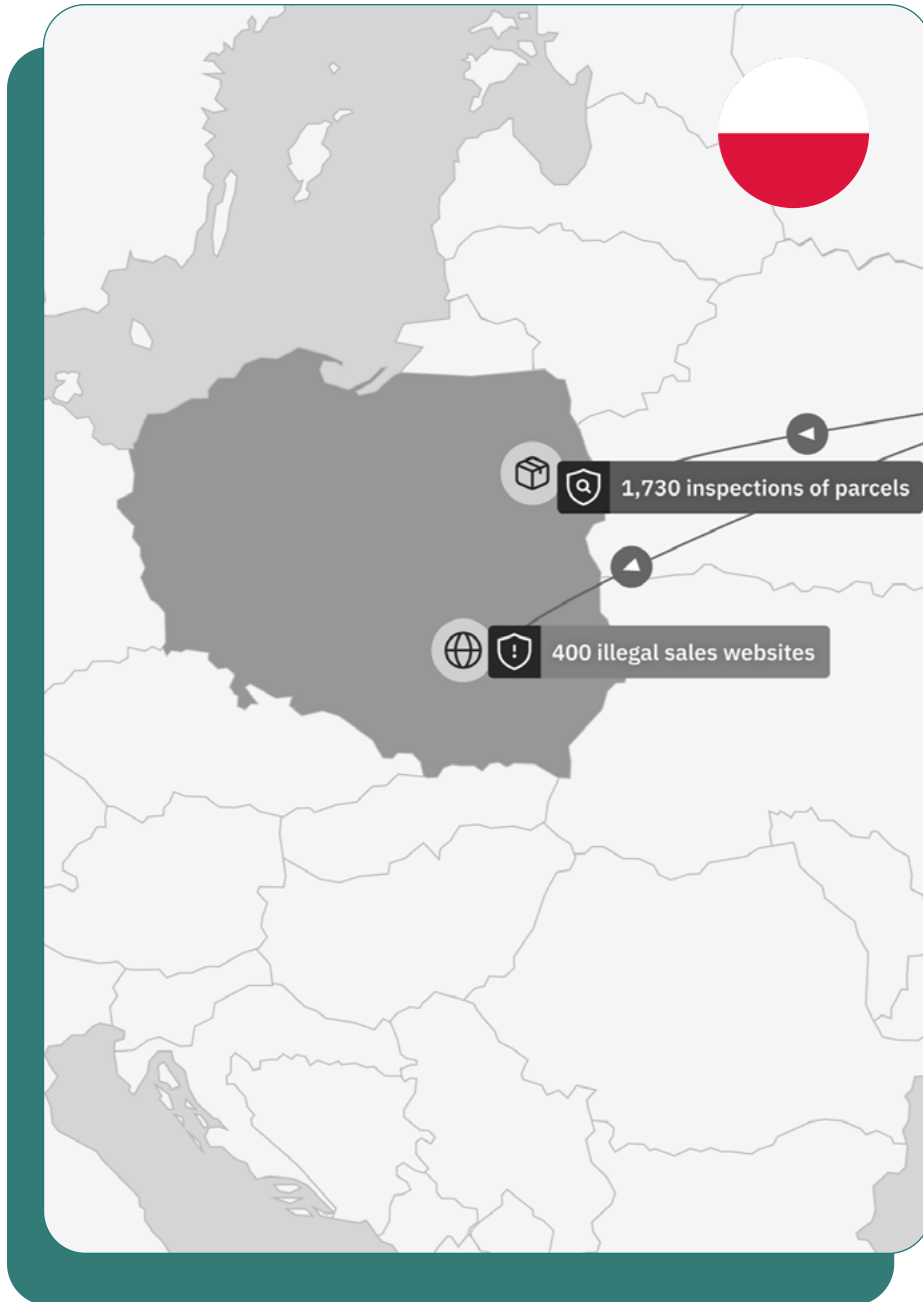


ApiraSol

E-CIGARETTES IN POLAND 2024/2025 – Q2

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.

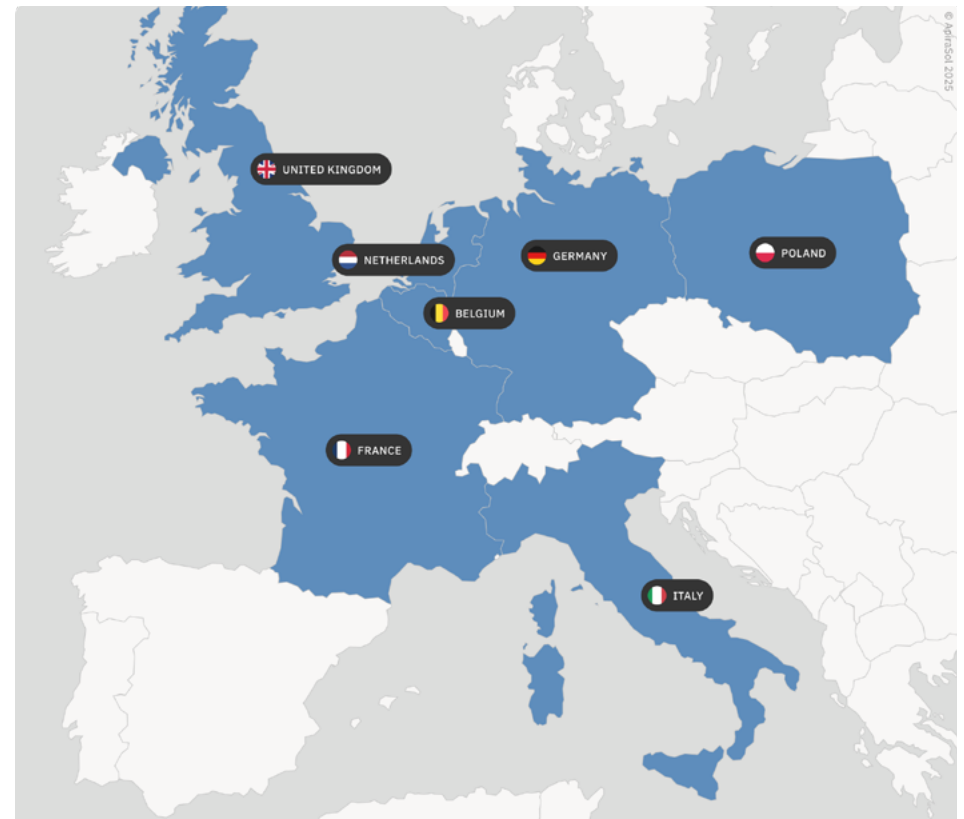
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**E-CIGARETTE
TRADE - EUROPE**

E-Cigarette Trade - Europe

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

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 -
POLAND

Summary

China's declared e-cigarette exports to Poland in 2024 totaled 197.45 million USD, while Poland's reported imports from China reached 162.79 million USD, creating a statistical gap of about 34.66 million USD. This discrepancy can be interpreted through several reinforcing factors:

- **Regulatory Environment:** Poland's tightening rules on e-cigarettes (restrictions on disposables, sales to minors, marketing and taxation) increase compliance risk and cost, giving traders incentives to under-declare, divert, or partially conceal sensitive e-cigarette flows. In practice, stricter regulation tends to push more product into gray or semi-formal channels, which are less accurately captured in official import statistics.
- **Re-Routing:** Shipments recorded by China as destined for Poland may be routed through intermediary hubs (other EU states or logistics centers), where they are cleared, stored, or re-exported. This can cause Chinese export data to show Poland as destination, while Polish import data attribute the same goods to a different partner or do not link them directly to the original Chinese shipment.
- **Misdeclaration and Evasion:** Traders may under-invoice values, split consignments, or classify e-cigarettes and nicotine liquids under broader or alternative product codes to reduce excise, VAT, or regulatory scrutiny. Such misdeclaration moves part of the trade out of the main e-cigarette categories used for

mirror comparison, widening the apparent gap between exports and imports.

- **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 Poland and its trading partners exacerbate discrepancies, making reconciliation of bilateral trade figures challenging.
- **Prevalence of Smuggling and Illicit Trade:** Evidence from Polish media and enforcement bodies points to significant illicit or semi-formal inflows of Chinese e-cigarettes and disposables, including untaxed or non-compliant products sold online and through informal networks. These channels often involve under-reporting, mis-reporting, or complete non-declaration in Polish customs data, so part of the physical trade visible in Chinese export statistics will not appear symmetrically in Poland's official import figures.

Taken together, these factors suggest that the China–Poland mirror differences in e-cigarette trade are a structural feature of how this cross-border market operates and is recorded, rather than a temporary statistical anomaly.

Regulatory Overview

Poland regulates e-cigarettes under the Act on Health Protection Against the Effects of Tobacco and Tobacco Products, which was amended in 2025 to include nicotine-free products such as refill containers and disposable devices. While e-cigarettes are not classified as tobacco products, they are subject to similar restrictions. The law aligns with the EU Tobacco Products Directive, requiring manufacturers and importers to register products via the EU-CEG system, submit ingredient disclosures, and comply with packaging standards.

All e-cigarette products must be registered through the EU Common Entry Gate (EU-CEG) system. Manufacturers and importers are required to submit detailed product information, including ingredients, emissions, toxicological data, and refill mechanisms and pay notification fees depending on company size.

Poland introduced a steep excise tax on e-liquids and devices in 2025. All e-liquids, regardless of nicotine content, are taxed at PLN 0.96 (€0.23) per ml, rising to PLN 1.44 (€0.34) in 2026 and PLN 1.90 (€0.45) in 2027. Disposable e-cigarettes and devices face a high flat tax of PLN 40 (€9.40) per unit, aimed at discouraging their use, especially among youth.

Poland has taken firm steps to restrict access and distribution of e-cigarettes. The minimum legal age for purchasing and using

these products is 18 years old, covering both nicotine-containing and nicotine-free variants. Additionally, distance sales, including online and cross-border transactions, are prohibited, requiring consumers to buy e-cigarettes and refill containers in person from authorized retailers.

Statistical Data (China as Origin)

China's declared exports of e-cigarettes to Poland in 2024 totaled \$197,451,000, while Poland's declared imports from China reached \$162,791,000—creating a **discrepancy of approximately \$34.66 million**. This discrepancy is consistent with a mix of factors, including transshipment and re-routing via other hubs, misdeclaration and partial evasion in customs filings, incomplete or asynchronous reporting between export and import statistics, limitations of publicly accessible customs data, and the role of smuggling and illicit trade in supplying the Polish market with Chinese disposable e-cigarettes.

Total Value 2024:

- Total Exports from China 2024: \$197,451,000
- Total Imports from China 2024: \$162,791,000
- **Statistical Gap: \$34,660,000**

EXPORTS OF E-CIGARETTES FROM CHINA TO POLAND - 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	POLAND	117,301	53,538
24041990	Other products containing nicotine substitutes, intended for inhalation without combustion	CHINA	POLAND	1,976	1,099
24041910	Other products containing tobacco substitutes, intended for inhalation without combustion	CHINA	POLAND	85	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	POLAND	78,089	31,943
Total:				197,451	86,580

IMPORTS OF E-CIGARETTES TO POLAND 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	POLAND	104,829	27,094
24041990	Products containing nicotine substitutes, intended for inhalation without combustion (excl. . . .	CHINA	POLAND	2,615	190
24041910	Products containing tobacco substitutes, intended for inhalation without combustion (excl. . . .	CHINA	POLAND	34	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	POLAND	55,313	22,305
Total:				162,791	49,589

 **POLAND**
STATISTICAL DATA



Exports from China to Poland
197,451,000

Total 2024 Value (USD)
1H 2025 Value (USD): 86,580,000

Imports to Poland from China
162,791,000

Total 2024 Value (USD)
1H 2025 Value (USD): 49,589,000

Statistical Data Gap *
34,660,000

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



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POLAND

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

China–Poland shipment data for 2024 indicate a structured e-cigarette supply chain in which China provides the overwhelming share of recorded consignments and Indonesia a minor supporting role. At the same time, not all movements are visible in available trade data: neither China nor Poland publishes full, shipment-level customs records, so the observable datasets represent only a subset of underlying e-cigarette flows between the two countries.

Shipments:	36 Trade Shipments
Period:	January - December 2024
Origin Countries:	China: 92 % Indonesia: 8 %
Origin Ports:	Not declared: 92 %, Denpasar Ngurah Rai U: 6 %, Cengkareng Soekarno Hatta U: 2 %
Destination Countries:	Poland
Destination Ports:	Not declared: 89 %, Warsaw: 11 %
Products:	Electronic cigarettes, liquid for electronic cigarettes, e-cigarettes, etc.
E-Cigarette Brands:	
Mode of Transport:	Railway: 89 %, Unknown: 8 %, Road: 3 %
Value declared:	11,909,591.73 USD (100 % of shipments)

POLAND

Weight declared:	223,378.25 KG (100 % of shipments)
Number of exporters:	12
Number of importers:	24
Top Exporters:	<i>>Lorem ipsum dolor amet, consectetur adipiscing elit. Sedibus rutrum gravida pulvinar dignissim ultrices imperdiet convallis? Dignissim neque condimentum cursus nulla scelerisque semper fermentum.</i>
Top Importers:	<i>gravida gravida. Phasellus faucibus efficitur quam semper egestas etiam luctus. Accumsan aliquam odio ultricies pulvinar, turpis dolor necetur feugiat. Aliquam idem lacus lacus ornare.</i>
HS Codes declared in shipments:	<p>240412: Other products containing nicotine, intended for inhalation without combustion (16 shipments)</p> <p>854340: Electronic cigarettes and similar personal electric vaporising devices (16 shipments)</p> <p>240419: Other products intended for inhalation without combustion (4 shipments)</p>



POLAND

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



Shipments (Period FY 2024)

36

Quantity

11,909,591.73

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 (89 %)
- Warsaw (11 %)



Origin Ports from China and Indonesia

- Not declared (92 %)
- Denpasar Ngurah Rai U (6 %)
- Cengkareng Soekarno Hatta U (2 %)

Mode of Transportation

Railway: 89 %, Unknown: 8 %, Road: 3 %

E-Cigarette Products

Electronic cigarettes, liquid for electronic cigarettes, e-cigarettes, etc.

Legal Brands at Time of Shipment

Wang, Wuyang, Wuyang, Wuyang

Top Importers

Wang Wuyang, Wuyang Wuyang, Wuyang Wuyang, Wuyang Wuyang

Top Exporters

Wang Wuyang, Wuyang Wuyang, Wuyang Wuyang, Wuyang Wuyang

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

Polish media and enforcement reporting indicate a rapidly expanding, China-linked market for disposable e-cigarettes in Poland, with controls struggling to keep up with online and informal distribution channels. Journalistic and expert estimates suggest that annual sales of disposable e-cigarettes are approaching 100 million units, a sharp increase within a year, and that a significant share of these products originates from China and targets teenagers with cheap, sweet, and fruity flavors. In response, medical associations, pediatricians, and public health experts have issued appeals to the health ministry and government to ban single-use e-cigarettes and tighten regulations, framing the spread of disposables as a growing epidemic among youth.

Polish customs and market monitoring agencies have reported a surge in disposable e-cigarettes imported from China, despite a national ban. Inspections at postal and courier facilities, as well as shops in cities like Białystok and Przemyśl, have led to the confiscation of hundreds of thousands of cartridges and liquids. Coverage emphasizes that much of the problematic market consists of Chinese-made, brightly packaged devices sold both online and in small retail outlets, often without excise stamps or compliance with EU rules on nicotine concentration and liquid volume. Investigative pieces on Money.pl and related portals highlight that a substantial part of this trade operates in a grey

or outright illegal zone, fed by direct imports from outside the EU and sustained by low prices and constant product rotation, making enforcement more difficult. At the same time, online availability is a key driver: illegal e-cigarettes can be ordered through webshops and social media with minimal or no age verification, and state authorities are portrayed as racing to block websites and social profiles that continuously reappear under new identities.

Enforcement reports from 2Firsts and other outlets describe concrete actions by customs, tax authorities, and police, including seizures of over 1,600 illegal e-cigarette products from an online seller and 8,500 unlabeled e-liquid bottles during an inspection of a business in Świdnica, with criminal fiscal proceedings and product-safety investigations opened in these cases. Officials frame these operations as part of a broader crackdown on untaxed and non-compliant nicotine products, combining fiscal control with health protection by sending seized goods for laboratory testing and checking labeling, composition, and documentation. However, press coverage repeatedly questions whether existing resources and tools are sufficient to contain a fast-growing, digitally enabled market that can quickly adapt its supply routes, branding, and sales channels in response to enforcement pressure.

- **Locations of Seizures:** Lublin (online store case handled by the Lublin Customs Office in Biała Podlaska), Białystok, Świdnica

in Lower Silesia, and inspections in shops and facilities in cities such as Białystok and Przemyśl, alongside controls of postal and courier consignments.

- **Products Seized:** Mainly disposable e-cigarettes and e-liquids without excise stamps or compliant labeling, including thousands of unlabeled bottles and untaxed devices; media note these are largely low-cost, flavored Chinese products aimed at young users, with brands seldom named in official releases.
- **Methods:** Products kept “hidden in plain sight” in shop or warehouse inventory without excise marks, and routed through postal and courier networks under generic or misleading descriptions, sometimes packed as ordinary consumer goods to avoid detection.
- **Enforcement:** Customs and tax authorities open fiscal crime investigations, send seized goods for testing, increase checks on parcels, and work to block websites selling untaxed e-cigarettes, though experts question whether these measures are sufficient against a fast-growing, adaptive illegal market.

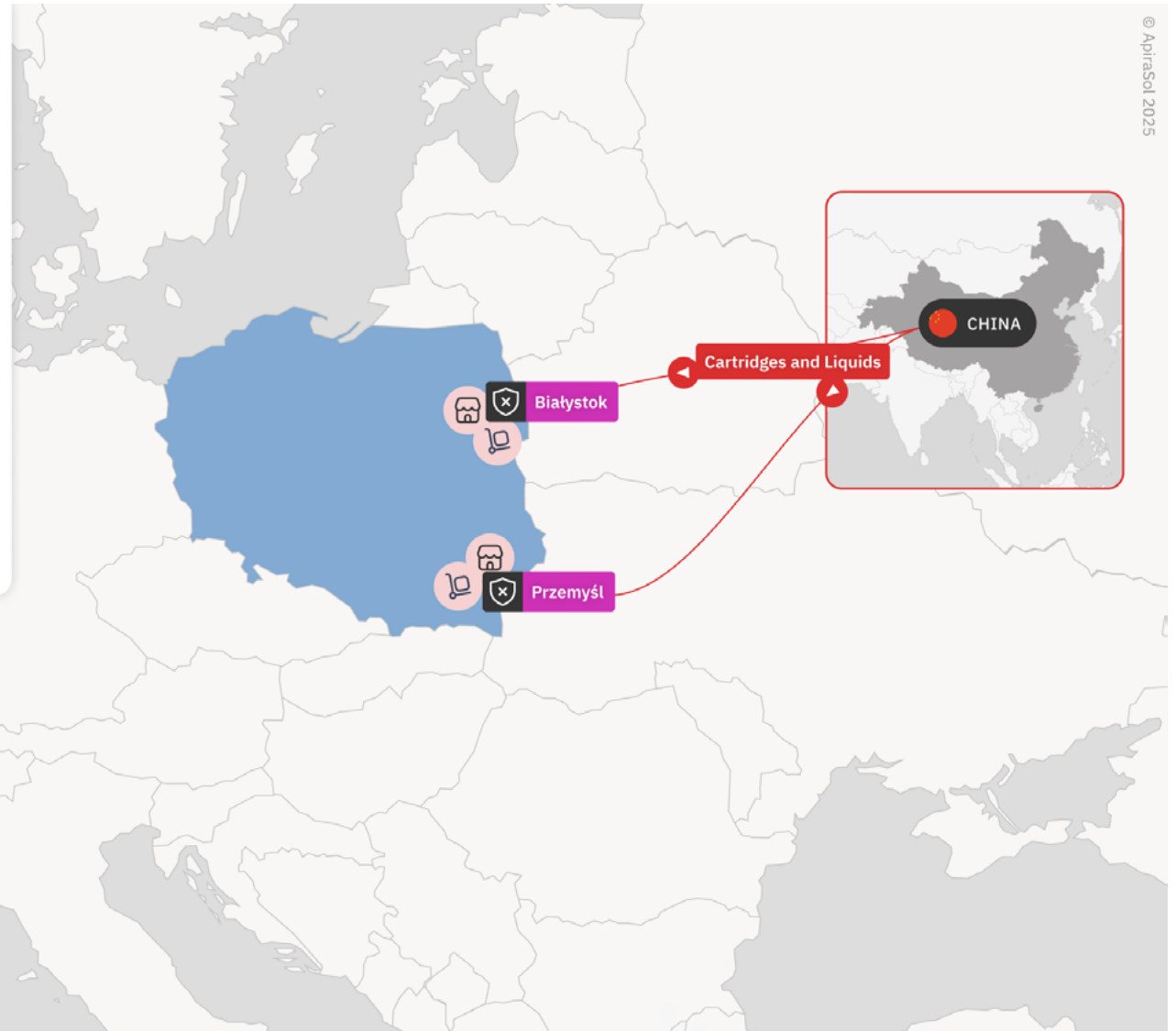


POLAND ILLCIT TRADE OVERVIEW

Polish customs and market monitoring agencies have reported a surge in disposable e-cigarettes imported from China, despite a national ban. Inspections at postal and courier facilities, as well as shops in cities like Białystok and Przemyśl, have led to the confiscation of hundreds of thousands of cartridges and liquids.

Legend

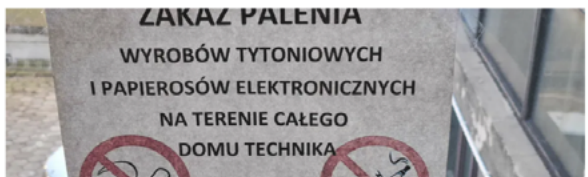
- Confiscation
- Postal and Courier Facilities
- Shops
- Illicit Shipment
- ENDS are regulated



Polish authorities conducted 1,730 inspections of parcels containing e-cigarettes and liquids between 2024 and August 2025, blocking nearly 400 illegal sales websites; most of the seized and inspected products originated from outside the EU, primarily China.

Nielegalne e-papierosy z Chin. Handel już kwitnie

Nielegalny handel papierosami elektronicznymi w internecie kwitnie. Zdolność aparatu państwowego do egzekwowania przepisów prawa i zakazu sprzedaży takich wyrobów nieletnim stoi pod znakiem zapytania - zwraca uwagę "Rzeczpospolita". Większość szarej strefy to dostawy przede wszystkim z Chin.

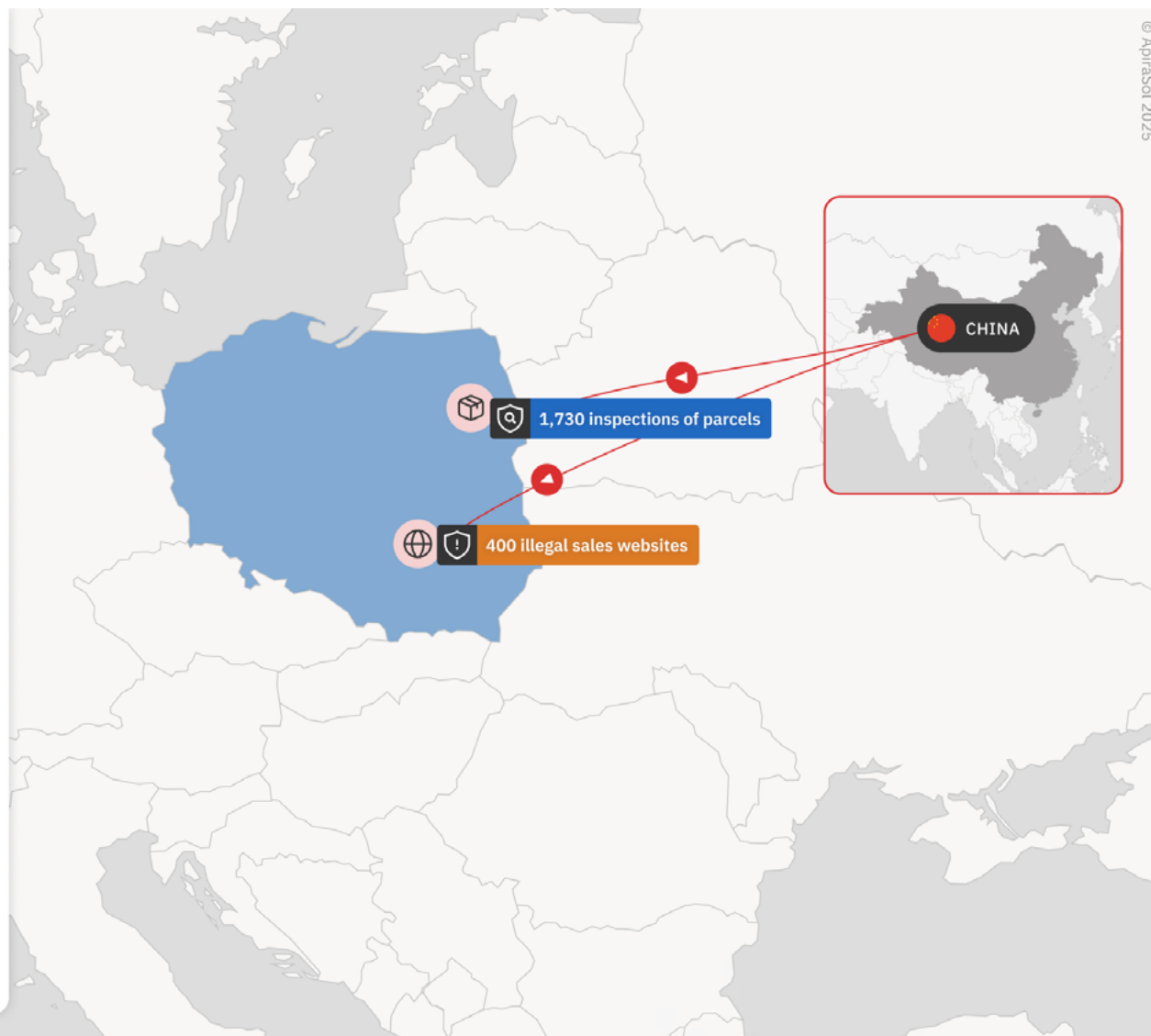


Legend

-  Inspection
-  Interception
-  Parcels
-  Websites
-  ENDS are regulated

Source

<https://www.money.pl/gospodarka/nielegalne-e-papierosy-z-chin-handel-juz-kwitnie-7195792464100256a.html>



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