

ApiraSol

E-CIGARETTES IN THAILAND 2024/2025 – Q2

SUPPLY CHAIN INTELLIGENCE
APRIL 2026



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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.

2

**E-CIGARETTE
TRADE - ASIA**

E-Cigarette Trade - Asia

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

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—

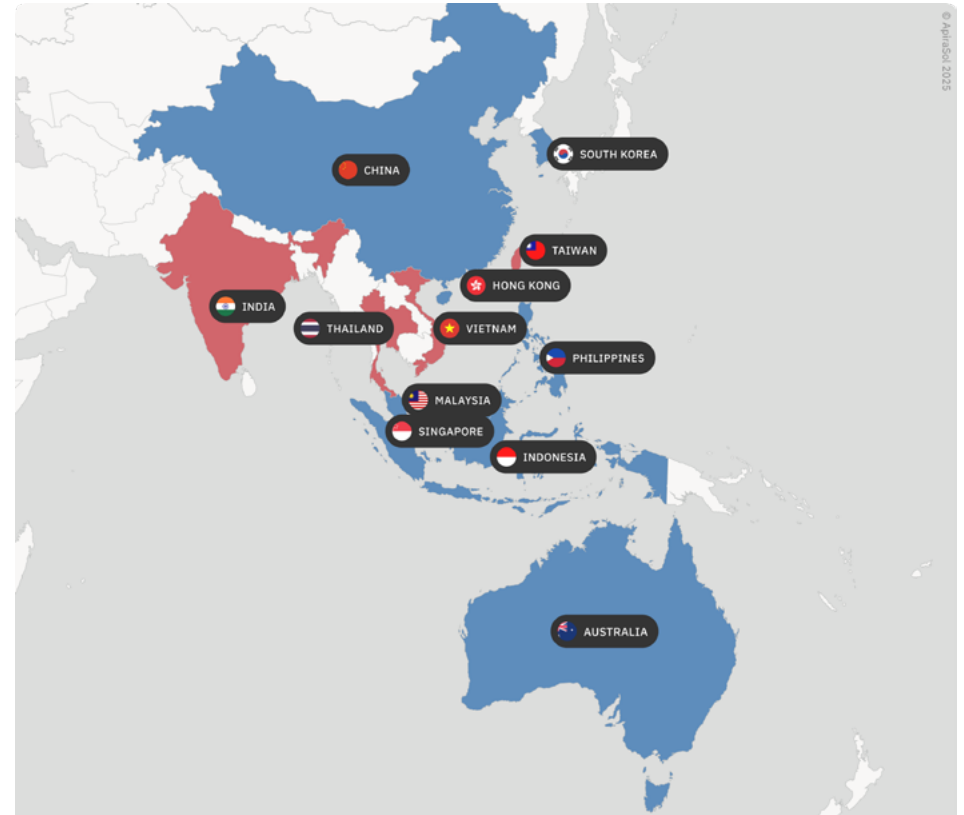
are imported, stored, and re-exported to other countries in the region.

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 offers a

stark example: since 2023, criminal syndicates have carried out more than 200 bombings and multiple homicides. This escalation underscores that the illicit e-cigarette trade is not merely a regulatory issue—it is a growing public safety threat intertwined with organized crime and, increasingly, drug-laced products.



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E-CIGARETTE TRADE - THAILAND

Summary

Thailand's official trade data for e-cigarettes shows considerable gaps and inconsistencies when compared to declared export figures from partner countries. These statistical anomalies arise primarily from Thailand's comprehensive ban on the import, sale, and possession of e-cigarette products, which forces the majority of market activities into unregulated and informal channels.

Key factors contributing to these gaps include:

- **Regulatory Environment:** The outright ban on e-cigarettes compels market participants to avoid customs clearance and formal reporting, resulting to no legitimate import entries in trade statistics.
- **Re-routing:** Some imports may be rerouted, declared under other product categories, or transshipped through third-party jurisdictions to evade detection and facilitate illicit sales domestically.
- **Misdeclaration and evasion:** Traders may falsely declare e-cigarette shipments as unrelated goods or use incorrect HS codes to disguise their true nature. These tactics are deployed to avoid customs inspection and regulatory penalties, allowing illicit products to enter Thailand's market despite the comprehensive ban, and rendering much of the trade invisible in official records.
- **Incomplete or Delayed Reporting:** Some shipments lack com-

plete 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 Thailand and its trading partners exacerbate discrepancies, making reconciliation of bilateral trade figures challenging.
- **Prevalence of Smuggling and Illicit Trade:** Large volumes of e-cigarette devices and liquids enter Thailand through clandestine methods, often concealed within other shipments, routed through neighboring countries, or distributed via black market networks, which are not captured in official customs data. Intensified crackdowns, large-scale raids, and frequent seizures by Thai authorities underscore the size of the undocumented market, with illicit products widely sold through online stores and social media platforms, further highlighting how official flows fall short of representing real consumer access and demand.

Overall, these factors ensure that Thailand's official trade data substantially underestimates actual cross-border movements of e-cigarette products. The country's regulatory stance, combined with the persistence of illicit supply chains, underscores the need for more harmonized international reporting, adaptive enforcement strategies, and improved monitoring to better understand and respond to the real scale of e-cigarette flows within the region.

Regulatory Overview

Thailand has enforced a strict prohibition on e-cigarettes since 2014, beginning with the Notification of the Ministry of Commerce Prohibiting the Import of Baraku and Electronic Cigarettes (B.E. 2557), which designates all electronic cigarettes and related components as prohibited import goods under the Export and Import of Goods Act. Importation is punishable by imprisonment for not more than 10 years or a fine of 5 times the price of the product, or both. This ban was strengthened in 2024 by the Consumer Protection Board through Decree No. 24/2024, which expanded restrictions to include a nationwide ban on the manufacture, sale, and provision of services for “Baraghu [baraku, hookah, or shisha], electric Baraghu or electric cigarettes or liquids for refilling electric Baraghu or electric cigarettes”. As a result, all forms of importation, production, distribution, and commercial handling of e-cigarettes are illegal in Thailand, regardless of nicotine. In addition, under the Customs Act B.E. 2560 (2017), individuals who possess e-cigarettes—or assist in concealing, transporting, purchasing, or receiving them—may be charged with handling prohibited or smuggled goods, an offense punishable by up to five years’ imprisonment or fines equal to four times the value of the goods, or both.

Statistical Data (China as Origin)

China’s declared exports of e-cigarettes to Thailand in 2024 totaled \$17,289,020, while Thailand’s declared imports from China reached \$198,000—creating a **discrepancy of approximately \$17 million**. This significant statistical gap indicates that large volumes of China-origin e-cigarettes are entering Thailand outside official channels, consistent with widespread smuggling and transshipment designed to bypass Thailand’s ban on e-cigarettes. The scale of this disparity suggests official records capture only a fraction of real market activity, highlighting persistent challenges in controlling illicit trade and enforcing import restrictions.

Total Value 2024:

- Total Exports from China 2024: \$17,289,020
- Total Imports from China 2024: \$ 198,000
- **Statistical Gap: \$17,091,000**

EXPORTS OF E-CIGARETTES FROM CHINA TO THAILAND - 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	THAILAND	16,896	34
24041990	Other products containing nicotine substitutes, intended for inhalation without combustion	CHINA	THAILAND	11	0
24041910	Other products containing tobacco substitutes, intended for inhalation without combustion	CHINA	THAILAND	0	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	THAILAND	382	5
Total:				17,289	39

IMPORTS OF E-CIGARETTES TO THAILAND 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)
24041210000	Products containing nicotine, intended for inhalation without combustion (excl. containing . . .	CHINA	THAILAND	163	N/A
24041290000	Products containing nicotine, intended for inhalation without combustion (excl. containing . . .	CHINA	THAILAND	1	160
24041910000	Products containing tobacco or nicotine substitutes, intended for inhalation without combustion . . .	CHINA	THAILAND	0	0
85434000000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	THAILAND	33	0
85434000999	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	THAILAND	1	0
Total:				198	160

 **THAILAND**
STATISTICAL DATA



Exports from China to Thailand

17,289,020

Total 2024 Value (USD)
1H 2025 Value (USD): 39,000

Imports to Thailand from China

198,000

Total 2024 Value (USD)
1H 2025 Value (USD): 160,000

Statistical Data Gap *

17,091,000

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



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THAILAND

TRADE DATA (MIRRORED DATA FROM INDONESIA)

Thailand's lack of official trade data for e-cigarettes is primarily the result of its stringent prohibition on the importation, sale, and possession of these products. The regulatory framework compels commercial activity to move outside formal channels, with most e-cigarette inflows circumventing customs and entering the country through unregistered or illicit routes. As a result, conventional trade reporting mechanisms do not capture the real scope of cross-border e-cigarette movements into Thailand.

Shipments:	4 Trade Shipments
Period:	January - December 2024
Origin Countries:	Indonesia
Origin Ports:	Sekupang: 100 %
Destination Countries:	Thailand
Destination Ports:	Bangkok: 100 %
Products:	Samples
E-Cigarette Brands:	<i>[Redacted]</i>
Mode of Transport:	Unknown
Value declared:	4.32 USD (100 % of shipments)
Weight declared:	0.48 KG (100 % of shipments)

THAILAND

Number of exporters:	1
Number of importers:	1
Top Exporters:	[REDACTED]
Top Importers:	[REDACTED]
HS Codes declared in shipments:	240419: Other products intended for inhalation without combustion (4 shipments)



THAILAND TRADE DATA (Mirrored Data from Indonesia)



Shipments (Period FY 2024)

4 Quantity | **4.32** Value (USD)

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



Destination Ports

■ Bangkok (100 %)



Origin Ports from Indonesia

■ Sekupang (100 %)

Mode of Transportation

Unknown

E-Cigarette Products

Samples

Legal Brands at Time of Shipment

None

Top Importers

None

Top Exporters

None

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

Thai enforcement agencies have launched aggressive nationwide crackdowns on illegal e-cigarette operations, uncovering vast smuggling networks and distribution hubs. Raids have targeted warehouses, shipping containers, and online sellers, with major seizures taking place in Nonthaburi, Saraburi, and Laem Chabang Port. Authorities have confiscated millions of e-cigarette products—many imported from China—often misdeclared as electronics or hidden among everyday goods. Investigations have revealed sophisticated supply chains involving Chinese investors and Thai nationals, with products distributed through over 100 retail outlets and prominent social media platforms, including X (formerly Twitter), Facebook (accounts and groups), Instagram, and TikTok. Some operations were linked to school zones and youth-targeted marketing, including toy-themed disposable e-cigarettes.









- **Locations of seizures:** Raids in Bangkok, Nonthaburi, Phuket, Pattaya.
- **Products seized & Scale:** Thousands to 20,000+ illegal e-cigarettes seized in single raids, including drug-laced products.
- **Methods:** Illicit e-cigarettes were sold via shops, factories run by foreign nationals, and online platforms (X, Facebook, Instagram, TikTok).
- **Enforcement Actions:** Police conducted multi-location raids, arrested suspects, and shut down online sales channels.

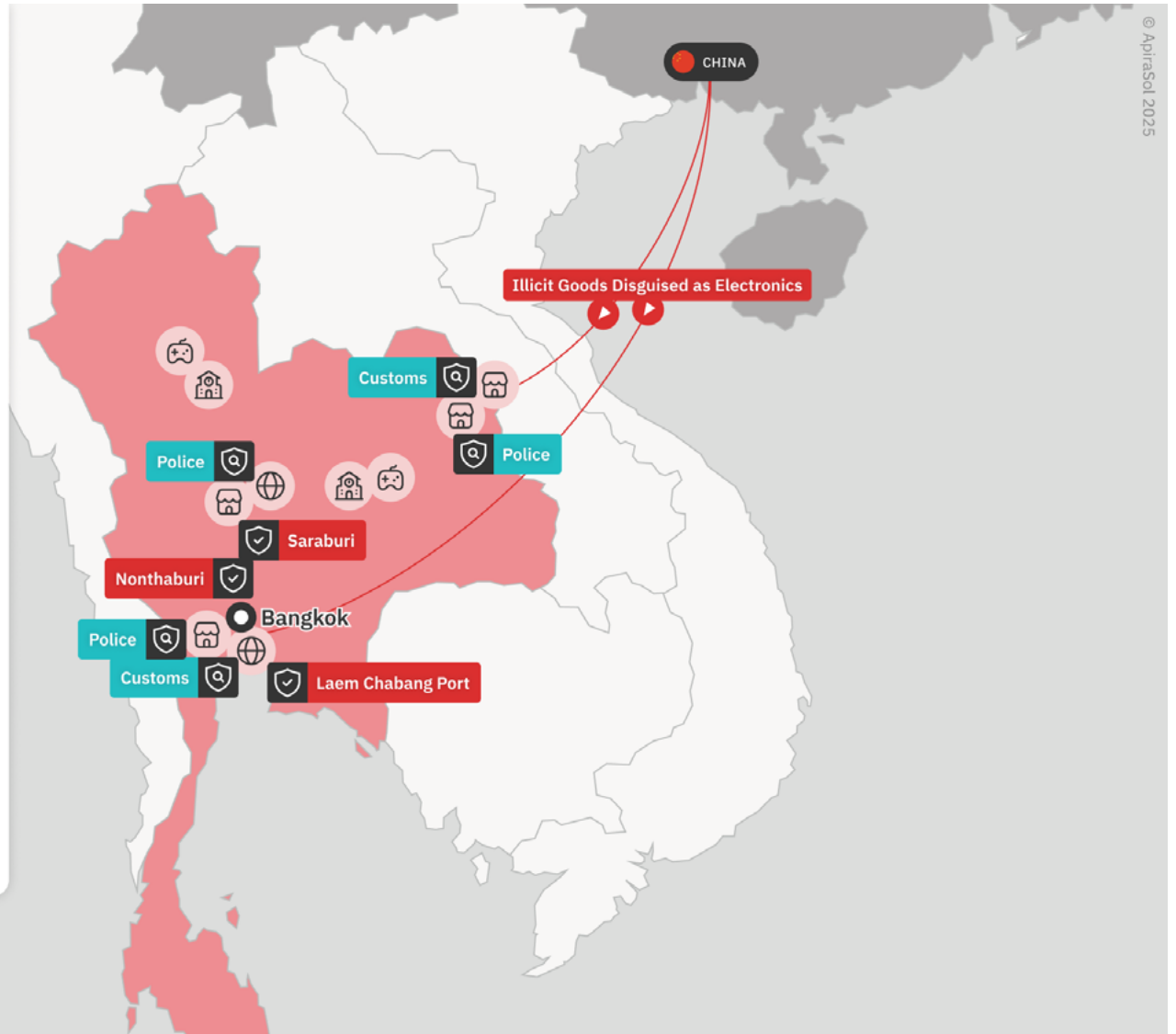


THAILAND ILLCIT TRADE OVERVIEW

Thai enforcement agencies have launched aggressive nationwide crackdowns on illegal e-cigarette operations, uncovering vast smuggling networks and distribution hubs. Raids have targeted warehouses, shipping containers, and online sellers, with major seizures taking place in Nonthaburi, Saraburi, and Laem Chabang Port. Authorities have confiscated millions of e-cigarette products—many imported from China—often misdeclared as electronics or hidden among everyday goods. Investigations have revealed sophisticated supply chains involving Chinese investors and Thai nationals, with products distributed through over 100 retail outlets and social media platforms. Some operations were linked to school zones and youth-targeted marketing, including toy-themed disposable e-cigarettes.

Legend

-  Seizure
-  Raid
-  Retail Outlet
-  Online Sales
-  School
-  Toy-Shaped E-cigarette
-  Illicit Shipment
-  ENDS are banned



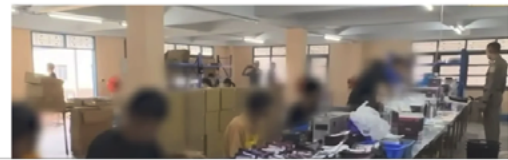
Police in Bangkok arrested 2 Chinese and 11 Burmese nationals at an illegal e-cigarette factory, seizing over 60,000 illicit e-cigarette products and equipment.

2 Chinese and 11 Burmese arrested in Bangkok e-cigarettes factory raid

Officers uncover millions worth of illicit products and seize machines

 Petch Petpaalin · Wednesday, September 10, 2025 Last Updated: Wednesday, September 10, 2025 1 minute read

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Legend



Seizure



ENDS are banned

Source

<https://thethaiger.com/news/bangkok/2-chinese-and-11-burmese-arrested-in-bangkok-e-cigarettes-factory-raid>



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