

# ApiraSol

## E-CIGARETTES IN THE UNITED KINGDOM 2024/2025 – Q2

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SUPPLY CHAIN INTELLIGENCE  
APRIL 2026



# Overview

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**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.

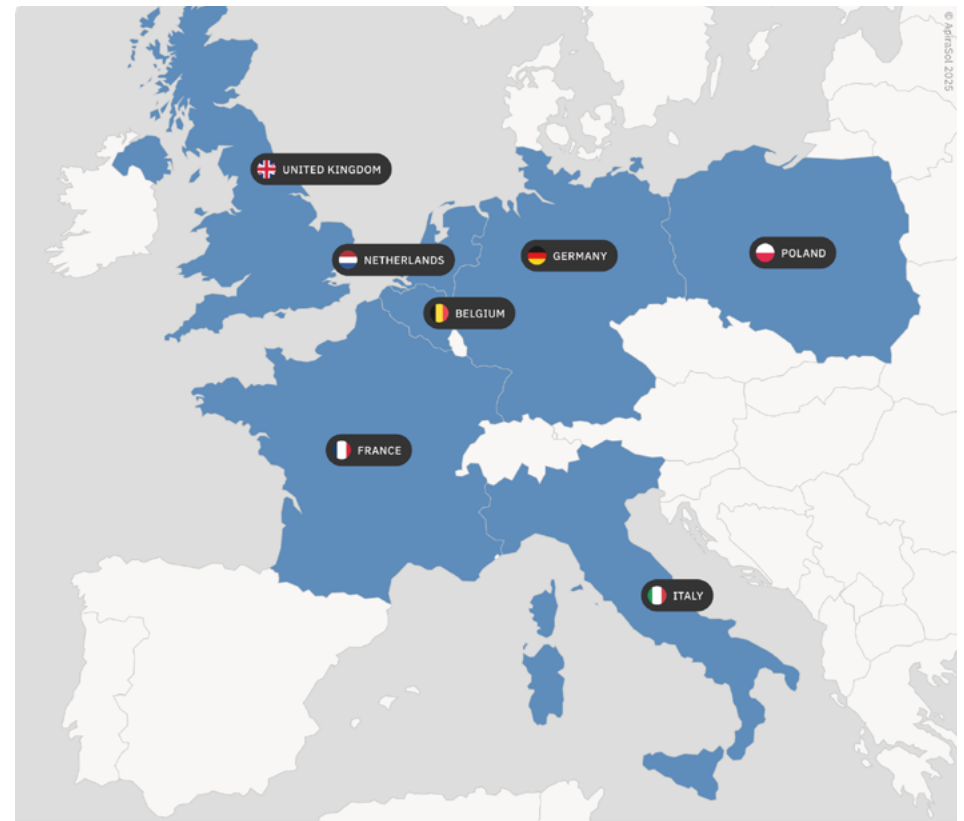
**2**

**E-CIGARETTE  
TRADE - EUROPE**

# E-Cigarette Trade - Europe

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

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.

**3**

**E-CIGARETTE TRADE -  
UNITED KINGDOM**

# Summary

China's declared e-cigarette exports to the UK in 2024 exceeded UK-reported imports by about 122.91 million USD, creating a clear statistical (mirror) gap between the two datasets. This gap reflects several overlapping factors:

- **Regulatory Environment:** The UK has introduced tighter controls on vaping products, including youth-vaping measures, excise rules and a legislated ban on disposable e-cigarettes from 2025, which raise compliance risks and costs for importers. These pressures can encourage diversion into grey channels, under-declaration, or the use of less visible routes that are not fully reflected in standard import data.
- **Re-Routing:** Chinese exports nominally destined for the UK may be routed via intermediary hubs (other EU states or regional logistics centres), where goods are cleared, stored or re-exported. In such cases, China may still record the UK as destination, while UK customs attribute the same shipments to a different immediate partner, breaking the one-to-one match between the two sides' figures.
- **Misdeclaration and Evasion:** Traders may under-invoice, split consignments, or classify e-cigarettes and nicotine liquids under broader or alternative product codes to reduce excise, VAT or regulatory scrutiny. This behaviour shifts part of the flow out of the main e-cigarette headings used for mirror comparison, so exports and imports diverge even when the underlying

physical trade is substantial.

- **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 the United Kingdom and its trading partners exacerbate discrepancies, making reconciliation of bilateral trade figures challenging.
- **Prevalence of Smuggling and Illicit Trade:** Evidence from UK enforcement and market reports points to extensive illicit and semi-formal e-cigarette inflows, including non-compliant or untaxed products from China sold via informal networks and online channels. Such flows frequently involve under-reporting, false declarations or non-declaration on the UK side, meaning that some trade fully counted in Chinese export data will not appear symmetrically in UK import figures.

Taken together, these factors indicate that the China–UK mirror gap in e-cigarette trade reflects how this cross-border supply chain is regulated, routed, declared and affected by the scale of illicit and semi-formal trade that lies outside fully compliant reporting channels.

## Regulatory Overview

The UK has significantly tightened its e-cigarette regulations in response to rising youth vaping rates and environmental concerns, particularly around disposable e-cigarettes. While the EU Tobacco Products Directive (TPD) was implemented by the UK government, devolved administrations—such as those in Scotland, Wales, and Northern Ireland—have introduced supplementary measures, including stricter advertising rules, flavor restrictions, and public use bans tailored to local health priorities.

Under the Tobacco and Vapes Bill, the UK government is granted broad discretionary powers to regulate all aspects of vaping products. This includes composition, packaging, marketing, retail licensing, and enforcement. A nationwide ban on disposable e-cigarettes came into effect on 1 June 2025 through the Environmental Protection (Single-use Vapes) Regulations 2024 which involved single-use devices due to their environmental impact and popularity among youth.

The bill also introduces a retail licensing scheme, a ban on vending machines, and provisions for restricted premises orders. Nicotine-free e-cigarettes, previously treated as consumer products, will be regulated under the same framework as nicotine-containing devices. Flavors remain permitted, but the government may restrict them using powers conferred by the bill. Packaging must be child-resistant and include health warnings such as “This product contains nicotine. Nicotine is an addictive chemical.” Online sales

are allowed with mandatory age verification.

An excise duty of £0.22 per mL on e-liquids is scheduled to begin in October 2026, marking the first time vaping products will be taxed similarly to tobacco.

## Statistical Data (China as Origin)

China’s declared exports of e-cigarettes to the United Kingdom in 2024 totaled \$1,227,364,000, while the United Kingdom declared imports from China reached \$1,104,455,000—creating a **discrepancy of approximately \$122.91 million**. This type of discrepancy is consistent with a mix of factors, including re-routing of consignments via intermediary hubs, strategic misdeclaration or under-invoicing to reduce tax and regulatory scrutiny, timing and valuation differences between Chinese export and UK import statistics, limitations in publicly available customs microdata, and the role of illicit or semi-formal e-cigarette channels that supply the UK market but are only partially captured in official import figures.

### Total Value 2024:

- Total Exports from China 2024: \$1,227,364,000
- Total Imports from China 2024: \$1,104,455,000
- **Statistical Gap: \$122,909,000**

## EXPORTS OF E-CIGARETTES FROM CHINA TO THE UNITED KINGDOM - 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	UK	965,911	236,313
24041990	Other products containing nicotine substitutes, intended for inhalation without combustion	CHINA	UK	8,111	1232
24041910	Other products containing tobacco substitutes, intended for inhalation without combustion	CHINA	UK	0	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	UK	253,342	322,677
<b>Total:</b>				<b>1,227,364</b>	<b>560,222</b>

## IMPORTS OF E-CIGARETTES TO THE UNITED KINGDOM 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	UK	974,337	470,113
24041990	Products containing nicotine substitutes, intended for inhalation without combustion (excl. . . .	CHINA	UK	1,210	1366
24041910	Products containing tobacco substitutes, intended for inhalation without combustion (excl. . . .	CHINA	UK	416	25
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	UK	128,492	58,691
<b>Total:</b>				<b>1,104,455</b>	<b>530,195</b>



Exports from China to the United Kingdom

**1,227,364,000**

Total 2024 Value (USD)  
1H 2025 Value (USD): 560,222,000

Imports to the United Kingdom from China

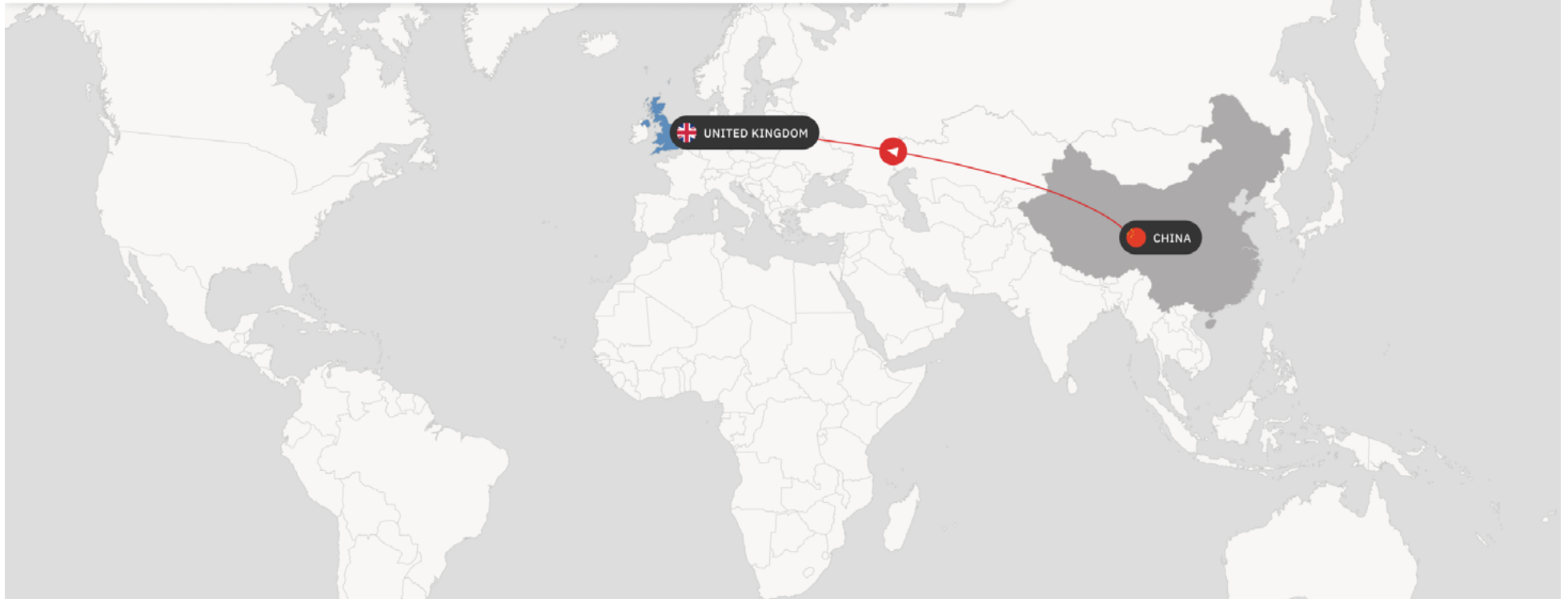
**1,104,455,000**

Total 2024 Value (USD)  
1H 2025 Value (USD): 530,195,000

Statistical Data Gap \*

**122,909,000**

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



# UNITED KINGDOM

## TRADE DATA

Trade data for 2024 indicate a diversified supply chain of e-cigarette devices and nicotine products from both Indonesia and China into the United Kingdom, pointing to an established cross-border corridor supplying the UK market with hardware and nicotine-containing consumables across varied shipment sizes and values. At the same time, visibility of these flows is inherently incomplete because China does not publish detailed shipment-level customs data and UK customs data, while available, are limited in scope and granularity, so publicly accessible trade data are unlikely to reflect the full scale and structure of this trade.

<b>Shipments:</b>	<b>213 Trade Shipments</b>
Period:	January - December 2024
Origin Countries:	Indonesia: 65 %, China: 35 %
Origin Ports:	Tanjung Priok: 31 %, Yantian: 30 %, Batu Ampar: 19 %, Sekupang: 7 %, Not declared: 6 %, Cengkareng Soekarno Hatta U: 2 %, Batam Hang Nadim U: 2 %, Jakarta: 2 %, Surabaya Juanda U: 1 %
Destination Countries:	<b>United Kingdom</b>
Destination Ports:	Southampton: 36 %, Felixstowe: 31 %, Feltham: 12 %, United Kingdom: 6 %, London: 5 %, Not declared: 4 %, Heathrow Apt London: 2 %, Lochgelly: 2 %, Manchester Airport: 2 %
Products:	<b>Atomizer devices, products containing nicotine intended for inhalation without combustion, electronic nicotine delivery systems, electronic cigarettes and similar personal electric vaporizers, pods, etc.</b>
E-Cigarette Brands:	<b>[REDACTED]</b>
Mode of Transport:	Unknown: 63 %, Sea: 33 %, Road: 4 %

## UNITED KINGDOM

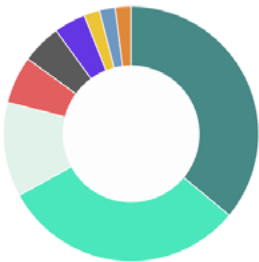
Value declared:	<b>2,443,884.13 USD</b> (67 % of shipments)
Weight declared:	1,105,098.86 KG (98 % of shipments)
Number of exporters:	17 - No exporters names were declared in 5 shipments
Number of importers:	13
Top Exporters:	<i>Placeholder text for top exporters</i>
Top Importers:	<i>Placeholder text for top importers</i>
HS Codes declared in shipments:	<p><b>240412:</b> Other products containing nicotine, intended for inhalation without combustion (156 shipments)</p> <p><b>854340:</b> Electronic cigarettes and similar personal electric vaporising devices (48 shipments)</p> <p><b>240419:</b> Other products intended for inhalation without combustion (9 shipments)</p>



Shipments (Period FY 2024)

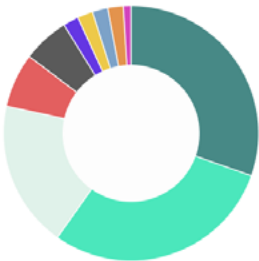
**213** | **2,443,884.13**  
Quantity | Value (USD)

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



**Destination Ports**

- Southampton (36 %)
- Felixstowe (31 %)
- Feltham (12 %)
- United Kingdom (6 %)
- London (5 %)
- Not declared (4 %)
- Heathrow Airport (2 %)
- Lochgelly (2 %)
- Manchester Airport (2 %)



**Origin Ports from China and Indonesia**

- Tanjung Priok (31 %)
- Yantian (30 %)
- Batu Ampar (19 %)
- Sekupang (7 %)
- Not declared (6 %)
- Cengkareng S. H. U (2 %)
- Batam Hang Nadim U (2 %)
- Jakarta (2 %)
- Surabaya (2 %)
- Juanda U (1 %)

**Mode of Transportation**

Unknown: 63 %, Sea: 33 %, Road: 4 %

**E-Cigarette Products**

Atomizer devices, products containing nicotine intended for inhalation without combustion, electronic nicotine delivery systems, electronic cigarettes and similar personal electric vaporizers, pods, etc.

**Legal Brands at Time of Shipment**

...

**Top Importers**

...

**Top Exporters**

...

## The online articles report on **seizures of illegal e-cigarette products in the United Kingdom.**

UK enforcement news from 2023–2025 shows an intense, geographically broad crackdown on illegal e-cigarettes, with Trading Standards and local councils removing substantial volumes of non-compliant products from ports, high streets, and small retailers. Across Kent, Leeds, Merseyside, Suffolk, Stoke-on-Trent, Manchester, Southend, Nottingham, Worcester and Newport, authorities report repeated raids on convenience stores, barbers, corner shops, and mini-markets, often uncovering hidden stocks of illicit e-cigarettes alongside illegal cigarettes. Individual cases range from “hundreds” to “thousands” of devices in small shops to major operations such as the Salford raid (illegal e-cigarettes valued at over £400,000) and Newport Trading Standards’ seizures of multi-million-pound mixed tobacco and e-cigarette consignments.

UK authorities have conducted widespread raids on ports, shops, and storage units, seizing millions of illegal e-cigarettes—many manufactured in China. Major operations at Kent ports and in cities like Manchester and London have uncovered products disguised as toys or beverages, with some shipments intercepted at the border and others found in hidden compartments within retail stores. The seized products are typically oversized or over-strength disposables, e-cigarettes with liquid capacities above the UK’s 2ml legal limit, devices with illegal nicotine con-

centrations, or items lacking correct health warnings and MHRA notification. Many are described as brightly packaged, child-appealing flavours and are sold cheaply, undercutting compliant products and attracting youth users. Enforcement reports repeatedly note e-cigarettes stored “out the back”, in ceiling voids or behind false walls, mixed in with other stock, or arriving in consignments mis-described on import paperwork, indicating deliberate concealment and misdeclaration along the supply chain.

Nationally, compiled figures indicate that more than a million illegal e-cigarettes a year are now being removed from the UK market, with seizures rising sharply and hotspots emerging in London (including Hillingdon), Essex, Liverpool, Kent, and parts of Wales. Enforcement tools include product seizures, fines, licence reviews or revocations, and, in serious cases, prosecutions and shop closure orders, but several analyses highlight that only a minority of identified illegal sellers currently face substantial penalties, raising questions about deterrent effect. At the same time, forthcoming measures—such as the national ban on disposable e-cigarettes, extended powers under the Tobacco and Vapes Bill, and increased funding for Trading Standards and border agencies—are expected to further strengthen the UK’s ability to disrupt non-compliant and illicit e-cigarette supply chains.

- **Locations of Seizures:** Raids in Kent (including ports), Leeds, Merseyside, Suffolk, Stoke-on-Trent, Manchester, Southend, Nottingham, Worcester, Newport, London boroughs (e.g.





Hillingdon) and across Essex, with National Trading Standards reporting over a million illicit e-cigarettes seized in a recent national crackdown.

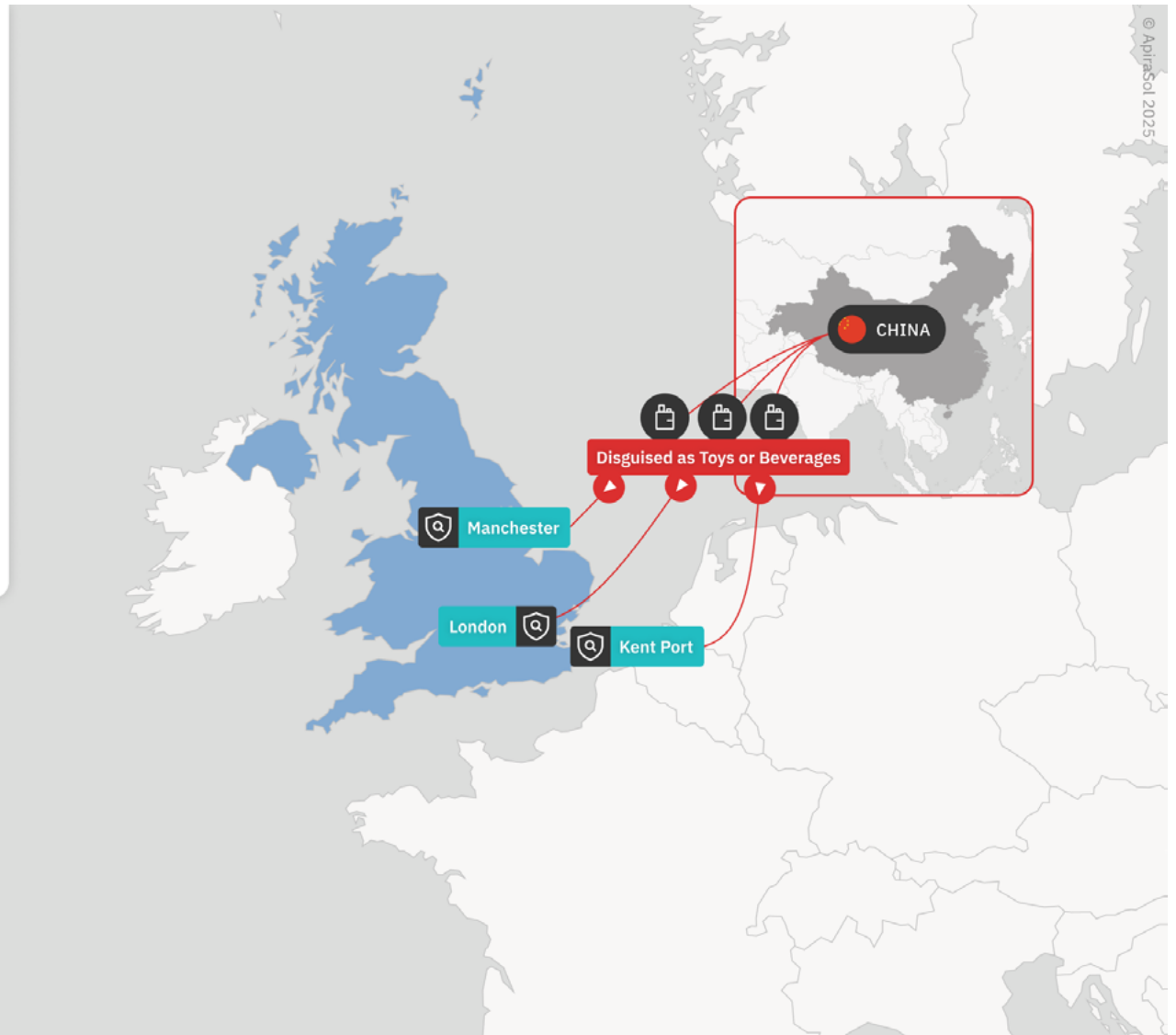
- **Products Seized:** Mostly disposable and refill e-cigarettes that exceed tank or nicotine limits, lack required warnings, or are unnotified; many are brightly packaged, flavoured devices described as imports from China and often sold alongside illicit cigarettes and hand-rolling tobacco.
- **Methods:** Illegal e-cigarettes hidden behind false walls, in ceilings, under floors, in base drawers, fridges or back-room stores, and mixed with legitimate stock; at the border and in warehouses they are embedded in mixed consignments and sometimes mis-described on paperwork.
- **Enforcement:** Trading Standards and councils use seizures, test purchases, fines, licence reviews/revocations, prosecutions and multi-agency raids (some worth hundreds of thousands of pounds in goods), under national operations such as Joseph and CeCe, though several reports question whether current penalties are strong enough to deter the illegal e-cigarette trade.

## UNITED KINGDOM ILLCIT TRADE OVERVIEW

UK authorities have conducted widespread raids on ports, shops, and storage units, seizing millions of illegal e-cigarettes—many manufactured in China. Major operations at Kent ports and in cities like Manchester and London have uncovered products disguised as toys or beverages, with some shipments intercepted at the border and others found in hidden compartments within retail stores.

### Legend

-  Raid
-  China-Made Illegal E-cigarettes
-  Illicit Shipment
-  ENDS are regulated



From 2024 to 2025, Newport Trading Standards seized £6.5 million (approximately \$8.13 million) worth of illegal tobacco, e-cigarettes, and counterfeit goods in 41 raids, including 300,000 cigarettes and 12,400 e-cigarette items.

**Newport, UK Seizes £6.5 Million Worth of Illegal Goods, Targeting E-Cigarettes and Counterfeit Products**

Jul 21, 2025



**Legend**



Raid



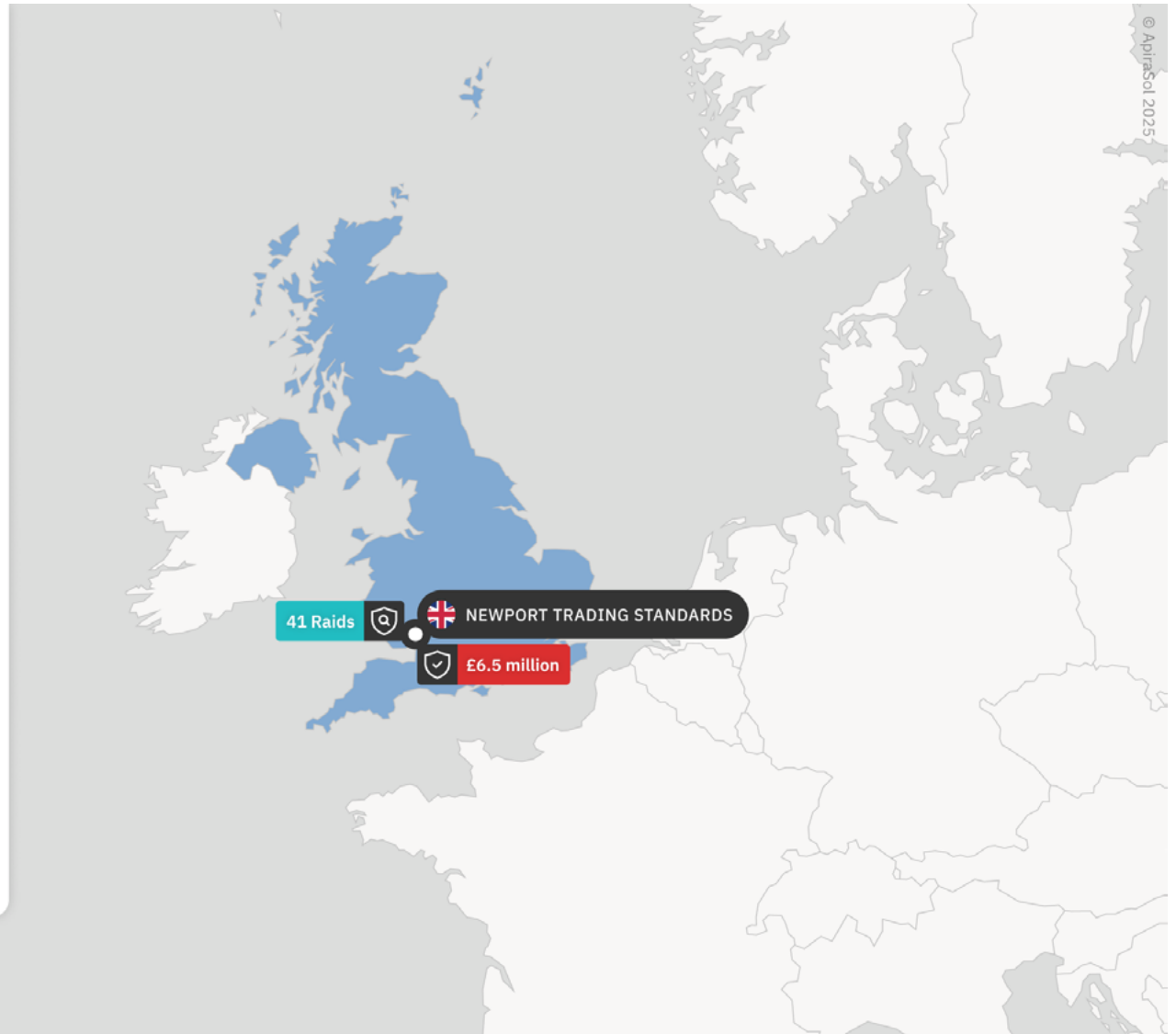
Seizure



ENDS are regulated

**Source**

<https://www.2firsts.com/news/uk-newport-city-seizes-813m-illegal-tobacco-e-cigarette-counterfeit-goods>



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