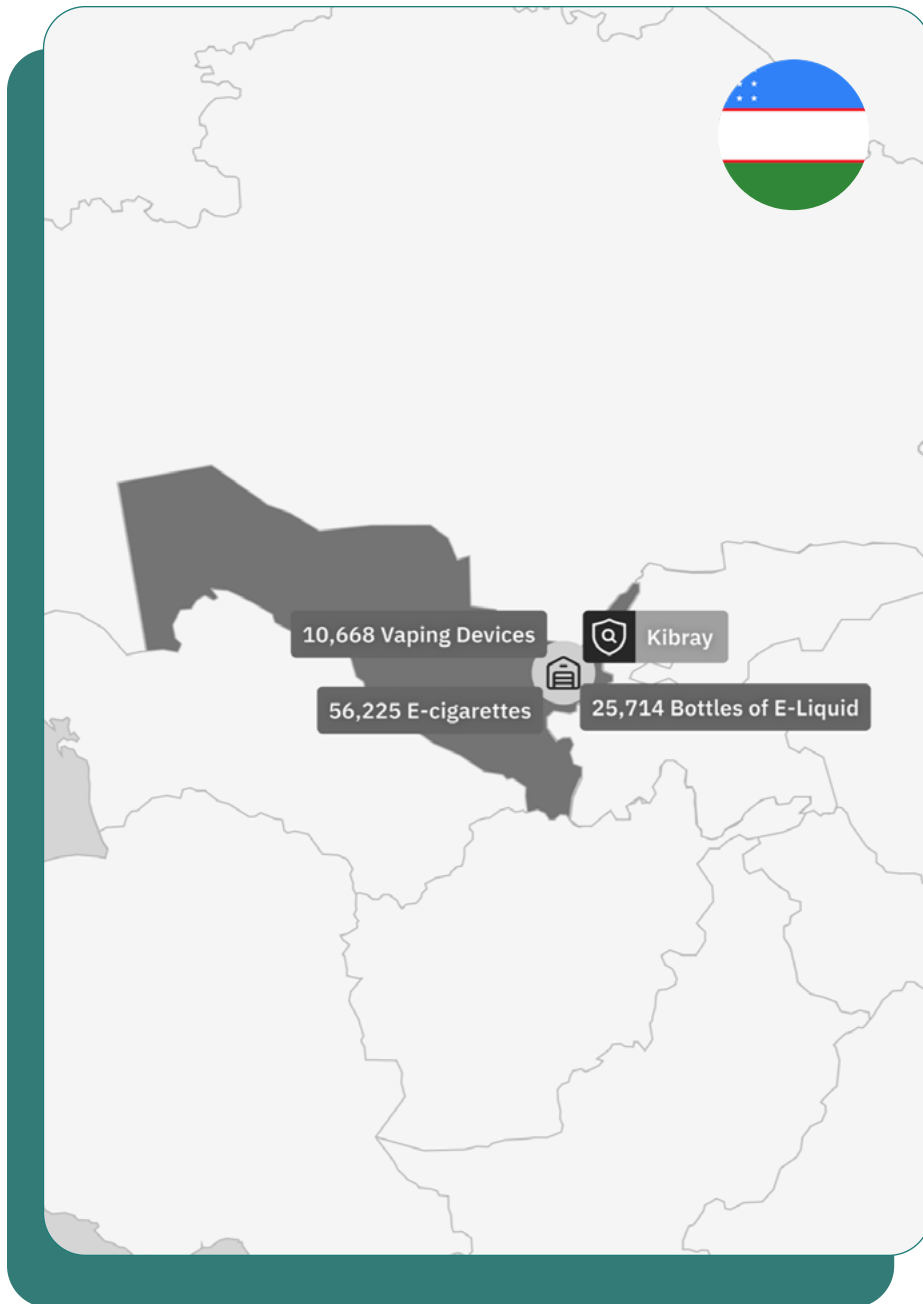


ApiraSol

E-CIGARETTES IN UZBEKISTAN 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.

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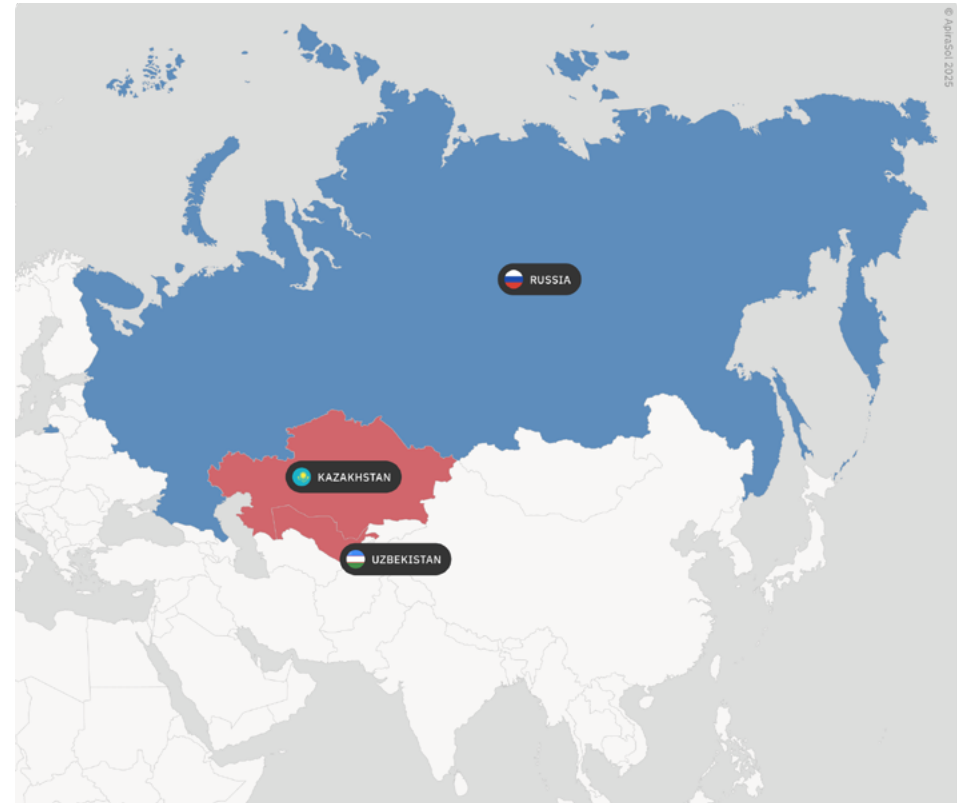
E-CIGARETTE TRADE - RUSSIA AND CENTRAL ASIA

E-Cigarette Trade - Russia and Central Asia

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

The e-cigarette regulatory environment in **Russia and Central Asia** is becoming increasingly restrictive. In **Russia**, e-cigarettes are permitted but subject to stringent controls under Federal Law and related technical standards. Current measures include mandatory licensing for production, storage, import, and retail (effective March 2026), product certification, health warnings, and bans on advertising and online sales. Additional rules impose excise tax hikes, while a nationwide ban on retail sales is under active consideration following proposals supported by the Ministry of Health. In **Central Asia**, the trend is toward prohibition: **Kazakhstan** imposed a full ban on the sale, production, and import of e-cigarettes in 2024, with severe penalties for violations, and **Uzbekistan** followed in 2025 by banning all circulation of e-cigarettes, disposable e-cigarettes, and nicotine pouches. These measures reflect growing concerns over youth uptake, illicit trade, and public health across the region.

Russia is one of China's largest e-cigarette export destinations, with Chinese customs reporting **hundreds of millions of dollars in shipments annually**. While Russia's official statistics import data has not been available since its invasion of Ukraine, the



Russian customs trade data indicates significantly lower imports from China, suggesting that a significant share of these products may enter the market through unrecorded or untaxed channels, fueling illicit trade. In **Kazakhstan**, despite the June 2024 ban, Chinese export data show shipments continuing through late 2024 and into 2025 implying smuggling through informal routes. In **Uzbekistan**, prior to its 2025 ban, declared imports from China exceeded China's reported exports, creating a statistical gap that suggests the country may have served as a transshipment hub.

Given Uzbekistan's strategic location in Central Asia, this pattern indicates that e-cigarettes—both legal and illicit—were likely imported, stored, and then re-exported to neighboring markets. This pattern continued into early 2025, with Chinese customs data still reporting millions of dollars in e-cigarette exports to Uzbekistan, even after the nationwide ban on circulation came into effect.

Illicit e-cigarette trade remains widespread across the region despite bans and strict regulations. Enforcement reports from **Russia** highlight a deeply entrenched black market, with Tamarind Intelligence citing illicit trade levels at around 60%. Recent raids have dismantled illegal production sites and intercepted cross-border shipments sourced from East Asia. In **Kazakhstan**, where Euromonitor estimates illicit e-cigarette penetration to be over 90%, authorities have conducted major operations at border checkpoints and warehouses, uncovering

smuggling networks linked to China and Russia, with the messaging app Telegram being used as a sales channel. **Uzbekistan** has concentrated on disrupting distribution networks in urban and regional hubs, conducting customs inspections and raids in schools and warehouses that resulted in the seizure of thousands of devices. Many of these products are suspected to originate from China and appear intended for redistribution to neighboring countries. These patterns reveal ongoing cross-border smuggling and organized networks exploiting porous borders and bans, fueling a robust underground market.

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E-CIGARETTE TRADE - UZBEKISTAN

Summary

Before the 2025 ban, in 2024 there was a significant statistical discrepancy between China's reported e-cigarette exports to Uzbekistan and Uzbekistan's reported imports from China, with the import figures notably exceeding the export figures. This mismatch points to long-standing issues in cross-border trade data, particularly for sensitive or regulated products like e-cigarettes.

Key reasons for the gap may include:

- **Regulatory Environment:** Uzbekistan's e-cigarette trade in 2024 took place against a dynamic regulatory backdrop. Prior to the 2025 ban, the sector was subject to increasing regulatory scrutiny, evolving import rules, and tightening compliance standards—especially for nicotine-containing and vaporizing products. These shifting policies heightened the reporting challenge for both exporters and importers.
- **Transshipment and Re-Routing:** Goods may be re-routed through third countries, logistics hubs, or free zones, causing discrepancies in origin reporting.
- **Misdeclaration and Evasion:** Exporters may deliberately understate values or quantities to reduce taxes, duties, or regulatory scrutiny, especially on the source side.
- **Incomplete or Delayed Reporting:** Some shipments lack complete data—such as shipment weight or transport mode—hampering transparency and granular reconciliation. Additionally,

differences in when shipments are recorded or delays in paperwork processing can create short-term statistical mismatches.

- **Customs Data Limitations:** Differences in classification standards, documentation practices, and valuation methods between Uzbekistan and its trading partners exacerbate discrepancies, making reconciliation of bilateral trade figures challenging.
- **Prevalence of Smuggling and Illicit Trade:** Part of the trade might occur through channels not reported in official statistics, including informal, grey market, or mislabeled shipments.

Trade data suggests a vigorous two-way flow, handled by a wide network of exporters and importers, primarily moving goods from China's major production centers. The gap highlights a need for strengthened transparency and alignment in cross-border reporting, particularly as regulatory controls tighten in Uzbekistan.

In summary, the significant statistical gap between China's declared exports and Uzbekistan's reported imports of e-cigarettes likely stems from indirect shipping, customs classification differences, underreporting, and informal flows. This discrepancy highlights persistent challenges in trade transparency and data alignment for regulated goods.

Regulatory Overview

Uzbekistan has enacted a complete ban on e-cigarettes and related products following legislative amendments approved by the Senate of the Oliy Majlis in April 2025. The new law prohibits the production, storage, transportation, import, export, sale, and use of electronic nicotine delivery systems (ENDS), including e-cigarettes and e-liquids, within the country. The ban does not apply to heated tobacco products (HTPs)—which use real tobacco sticks heated to produce aerosol.

The legislation introduces amendments to the Criminal Code, the Code of Administrative Responsibility, and the law “On restricting the distribution and consumption of alcohol and tobacco products.” Violations of the ban are subject to administrative penalties such as confiscation of prohibited items and fines ranging from \$2,897 to \$5,000 (37.5 to 75 million Uzbek soums). Repeat offenses or more serious violations may result in criminal penalties, including fines between \$11,600 to \$17,401 (150 to 225 million soums), up to 3 years of corrective labor, or up to 5 years of imprisonment. In large-scale or aggravated circumstances—such as group involvement, repeat offenses, or abuse of official position—penalties can reach up to 12 years in prison.

Because e-cigarettes are banned outright, there are no provisions for packaging, flavor regulation, advertising, public use, or age restrictions—these products are not permitted in any form. The law reflects Uzbekistan’s strong stance on tobacco control and its

commitment to protecting public health, especially among children and adolescents.

Statistical Data (China as Origin)

China’s declared exports of e-cigarettes to Uzbekistan in 2024 totaled \$5,739,000, while Uzbekistan’s declared imports from China reached \$9,517,000—creating a **discrepancy of approximately \$3.8 million**. The gap suggests possible issues such as underreporting on the Chinese side, overvaluation or inclusion of indirect shipments in Uzbek data, or timing and classification differences in customs reporting. Such mismatches are often seen in trade involving re-exports, transshipment through intermediary hubs, or incomplete HS code alignment.

Total Value 2024:

- Total Exports from China 2024: \$5,739,000
- Total Imports from China 2024: \$ 9,517,000
- **Statistical Gap: \$3,778,000**

EXPORTS OF E-CIGARETTES FROM CHINA TO UZBEKISTAN - 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	UZBEKISTAN	5,113	1,893
24041990	Other products containing nicotine substitutes, intended for inhalation without combustion	CHINA	UZBEKISTAN	0	0
24041910	Other products containing tobacco substitutes, intended for inhalation without combustion	CHINA	UZBEKISTAN	0	0
85434000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	UZBEKISTAN	626	7
Total:				5,739	1,900

IMPORTS OF E-CIGARETTES TO UZBEKISTAN 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)
2404120000	Products containing nicotine, intended for inhalation without combustion (excl. containing . . .	CHINA	UZBEKISTAN	8,457	N/A
2404190001	Products containing tobacco or nicotine substitutes, intended for inhalation without combustion . . .	CHINA	UZBEKISTAN	8	N/A
8543400000	Electronic cigarettes and similar personal electric vaporizing devices	CHINA	UZBEKISTAN	1,052	N/A
Total:				9,517	-

 **UZBEKISTAN**
STATISTICAL DATA



Exports from China to Uzbekistan

5,739,000

Total 2024 Value (USD)
1H 2025 Value (USD): 1,900,000

Imports to Uzbekistan from China

9,517,000

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

Statistical Data Gap *

-3,778,000

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



UZBEKISTAN

TRADE DATA

The data indicates a steady and diversified flow of e-cigarette products from China to Uzbekistan, dominated by shipments from major manufacturing hubs like Shenzhen and Guangzhou. The trade involves a broad mix of disposable and refillable vaping devices, reflecting an active consumer market. Multiple mid-sized exporters and importers participate, suggesting fragmented but consistent supply networks.

Shipments:	1,525 Trade Shipments
Period:	January - December 2024
Origin Countries:	China
Origin Ports:	Shenzhen: 69 %, Guangzhou: 4 %, Jiangmen: 2 %, Zhongshan: 1 %, Others: 24 %
Destination Countries:	Uzbekistan
Destination Ports:	Not identified: 100 %
Products:	Disposable electronic cigarettes, liquids with nicotine, disposable cartridges, electronic disposable vaporizers, electronic evaporative reusable devices without nicotine liquids, etc.
E-Cigarette Brands:	<i>Placeholder text for E-Cigarette Brands</i>
Mode of Transport:	Unknown: 100 %
Value declared:	5,580,011.14 USD (100 % of shipments)

UZBEKISTAN

Weight declared:	106,094.48 KG (100 % of shipments)
Number of exporters:	72
Number of importers:	43
Top Exporters:	<i> Lorem ipsum dolor amet, consectetur adipiscing elit. Sed ut elit, tincidunt nunc tristique. Aenean in ipsum. Nullam porttitor ligula. Duis ut enim justo. Rhoncus quam, est tincidunt elit. Vestibulum augue ante, semper consectetur condimentum et. Nullam nisi mauris convallis diam accumsan nisi enim. Sed euismod nunc, ac convallis ipsum. </i>
Top Importers:	<i> gravida gravida. Phasellus fructus efficitur quam tempus euismod elit. Vestibulum augue ante, semper consectetur condimentum et. Nullam nisi mauris convallis diam accumsan nisi enim. Sed euismod nunc, ac convallis ipsum. </i>
HS Codes declared in shipments:	<p>240412: Other products containing nicotine, intended for inhalation without combustion (1,362 shipments)</p> <p>854340: Electronic cigarettes and similar personal electric vaporising devices (153 shipments)</p> <p>240419: Other products intended for inhalation without combustion (10 shipments)</p>



Shipments (Period FY 2024)

1,525 **5,580,011.14**
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 identified (100 %)



Origin Ports from China and Indonesia

- Shenzhen (69 %)
- Guangzhou U (4 %)
- Jiangmen U (2 %)
- Zhongshan U (1 %)
- Others (24 %)

Mode of Transportation

Unknown: 100 %

E-Cigarette Products

Disposable electronic cigarettes, liquids with nicotine, disposable cartridges, electronic disposable vaporizers, electronic evaporative reusable devices without nicotine liquids, etc.

Legal Brands at Time of Shipment

Unknown: 100 %

Top Importers

Unknown: 100 %

Top Exporters

Unknown: 100 %

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

Uzbek enforcement agencies have confiscated illicit e-cigarettes in schools, public institutions, and during customs inspections in Tashkent and Navoi. Seizures include thousands of devices and related products, with some operations uncovering large caches in warehouses and residential areas. While the origin of many products is not always specified, authorities have focused on disrupting distribution in both urban and regional centers.

Analysis of recent enforcement news further highlights a clear policy shift and an intensifying crackdown on the illegal e-cigarette trade. Legislative measures advancing toward a full ban have been driven by growing concern over youth use. Authorities have dismantled clandestine production sites and filed criminal cases, revealing a mix of unauthorized retail, covert manufacturing, and black-market supply networks. These actions underscore rising law enforcement vigilance, persistent gaps in logistics transparency, and continuing tension between public health objectives and illicit market responses.

- **Locations of Seizures:** Seizures occurred in Tashkent, Kibray District, and at customs checkpoints.
- **Products Seized:** Tens of thousands of illicit e-cigarettes, pods, e-cigarette liquids, and illegal tobacco worth billions of soums.
- **Brands Seized:** Most official reports do not name brands, but

enforcement actions have referenced major Chinese brands such as **WUJIANG** and flavored disposables in line with trends seen in regional seizures.

- **Methods:** Goods were smuggled across borders, hidden in warehouses and retail outlets, with several underground manufacturing sites dismantled.
- **Enforcement:** Raids led to arrests, product destruction, and disruption of illicit supply chains—efforts intensified by upcoming regulatory bans.



UZBEKISTAN ILLCIT TRADE OVERVIEW

Uzbek enforcement agencies have confiscated illicit e-cigarettes in schools, public institutions, and during customs inspections in Tashkent and Navoi. Seizures include thousands of devices and related products, with some operations uncovering large caches in warehouses and residential areas. While the origin of many products is not always specified, authorities have focused on disrupting distribution in both urban and regional centers.

Legend



Seizure



Warehouse



Residential Area



ENDS are banned





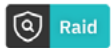
In Uzbekistan's Kibray district, authorities raided a clandestine workshop, seizing 144,567 packs of tobacco products—including 56,225 e-cigarettes, 25,714 bottles of e-liquid, 10,668 vaping devices, and 3,800 hookahs. Criminal cases were initiated for illegal production and sale.

Secret electronic cigarette manufacturers detained in Kibray

• Crime - 17 May 2025 • 3956 • 2 Minutes



Legend



Raid



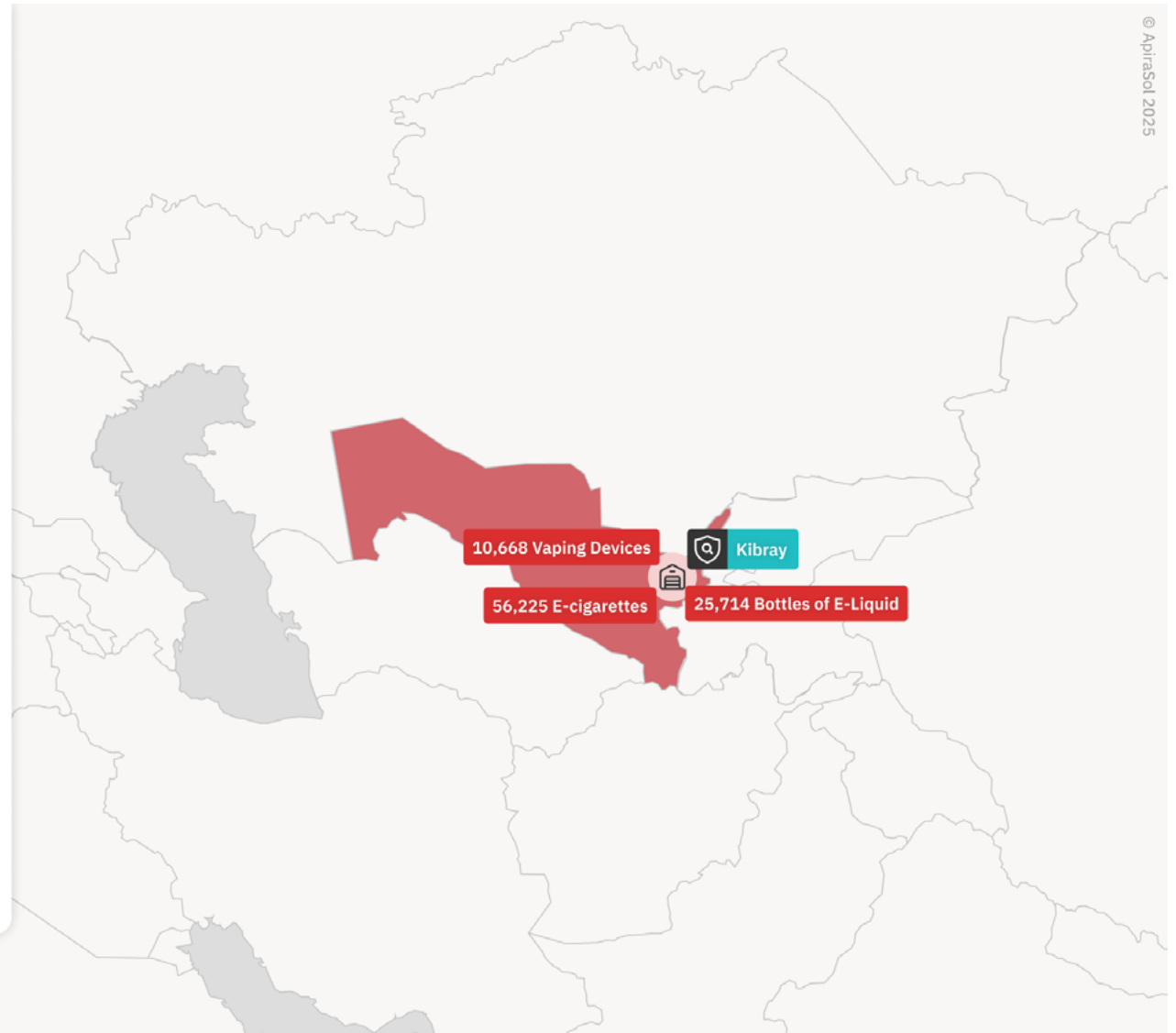
Clandestine Workshop



ENDS are banned

Source

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Contact us

ApiraSol GmbH

Pappelallee 78

10437 Berlin, Germany

+49 3023 61 60 22

info@apirasol.com

www.apirasol.com