

SUMMARY

# DARK CLOUDS

A preliminary exploration of the illegal vape trade in the Netherlands

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# Introduction

Vapes are everywhere; their visibility extends from end users on the street to social media content, movies, and the news. Medical professionals are raising concerns about a potential vaping epidemic due to significant health risks, particularly given the popularity of (flavored) vapes among (underage) youth.<sup>1</sup> Since 2020, legislation and regulations for vapes have been gradually amended. Since 2023, the online sale of vapes was banned, and an advertising ban was in place.<sup>2</sup> Since January 1, 2024, all flavors other than tobacco have been banned, with the aim of making e-cigarettes less attractive to young people.<sup>3</sup> Despite these changes in legislation, it appears that there are still many illegal vapes in circulation and being traded.<sup>4</sup> There is considerable media attention, with reports on the role of the tobacco industry, the sale of vapes on social media platforms, and descriptions of vape dealers.

## What are vapes?

Vapes, or e-cigarettes, are devices that contain a liquid with a mixture of flavorings and other substances. The device heats the e-liquid, creating vapor that the user inhales. The liquid does not contain tobacco, but often contains nicotine.<sup>5</sup> Every e-cigarette has three parts: a battery, a heating element, and a cartridge with e-liquid.<sup>6</sup> Users can choose different types of vapes, such as single-use vapes (disposable vapes) or vapes that they refill with liquid.

## Purpose of the study and approach

The underlying mechanisms of illegal trade in vapes were largely unknown until now. The Ministry of Health, Welfare, and Sport stated that there is insufficient knowledge of the nature and extent of the trade in vapes and asked Bureau Beke to investigate.

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1. Artsen Slaan Alarm, 2025.
  2. Government of the Netherlands, w.d. -1
  3. Government of the Netherlands, w.d. -1
  4. Netherlands Food and Consumer Product Safety Authority, 2025a; Written communication, dated October 7, 2025. (footnote 13 in report)
  5. National Institute for Public Health and the Environment, w.d.
  6. Schaap et al., 2023.



With the knowledge gained from the exploratory study, it is possible to:

1. Develop or refine targeted policies to combat the illegal vape trade;
2. Improve (the supervision of) compliance with the rules for vapes.

Five research questions were formulated (with five sub-questions). These concerns:

- The size of the market for illegal e-cigarettes
- The channels used for trade
- The motives, risk factors, and protective factors for trade
- The link between illegal e-cigarette trade and organized crime.

We carried out various research activities to answer the research questions, including:

- Literature review
- Two questionnaires (among the population and among social workers)<sup>7</sup>
- A social media analysis
- Interviews with 45 professionals and 20 youths.

This memo is a summary of the report *Dark Clouds*, a study conducted by Bureau Beke on behalf of the Ministry of Health, Welfare, and Sports.

This summary contains the most important findings and recommendations. For a detailed methodological justification and explanation of the research results, please refer to the original report.<sup>8</sup> Before we proceed with the content, it is important to emphasize that this is the first time that research has been conducted into the illegal vape trade in the Netherlands. There was relatively little knowledge and concrete data available. In addition, the lack of accounting and ‘secret’ working methods is characteristic of an illegal market, which means that the numerical conclusions in this summary should be approached with some caution. In any case, this summary provides an initial picture of the illegal vape trade.

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7. The general population questionnaire was completed by 5,529 people, including 501 who occasionally vape. The questionnaire for social workers was completed by 38 people.

8. See: Berger, E., Derksen, E., Dinnissen, C., & Van Esseveldt, J. (2025). *Donkere wolken: een eerste verkenning van illegale vapehandel in Nederland*. Bureau Beke.

# Size of the illegal e-cigarette market

Dutch law requires vapes to meet several standards. These standards limit the quantity of e-liquid (number of puffs), nicotine content per vape, permitted flavors (only tobacco), and sales channels (such as banning online sales, supermarkets, and hospitality venues). This study classifies a vape as 'illegal' based on these indicators.

This study mapped the illegal vape market using data from various population questionnaires and extrapolated findings to the full population. Because this is a rough estimate, the results should be interpreted with the necessary caution.

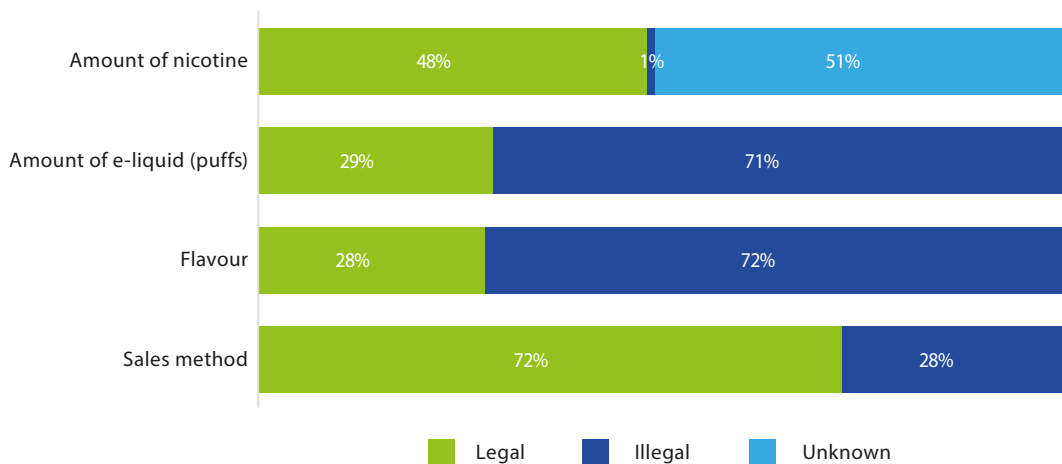
## Use illegal vapes

*“The whole of the Netherlands is flooded with those things.”  
(translated, Ro1, police)*

This study finds that 87 percent of the vaping population in the Netherlands uses illegal vapes or vapes obtained through illegal sales channels. This percentage highlights the dominance of the illegal market in the country. In most cases, there is a combination of three illegal indicators:

1. Use of an excessive amount of e-liquid (indicated by the number of puffs);
2. Use of a flavor other than tobacco, typically a sweet flavor;
3. Sales through an illegal channel, such as online sales.

Figure 1 - Proportion of legal, illegal, or unknown vapes per indicator



## Retail prices of vapes

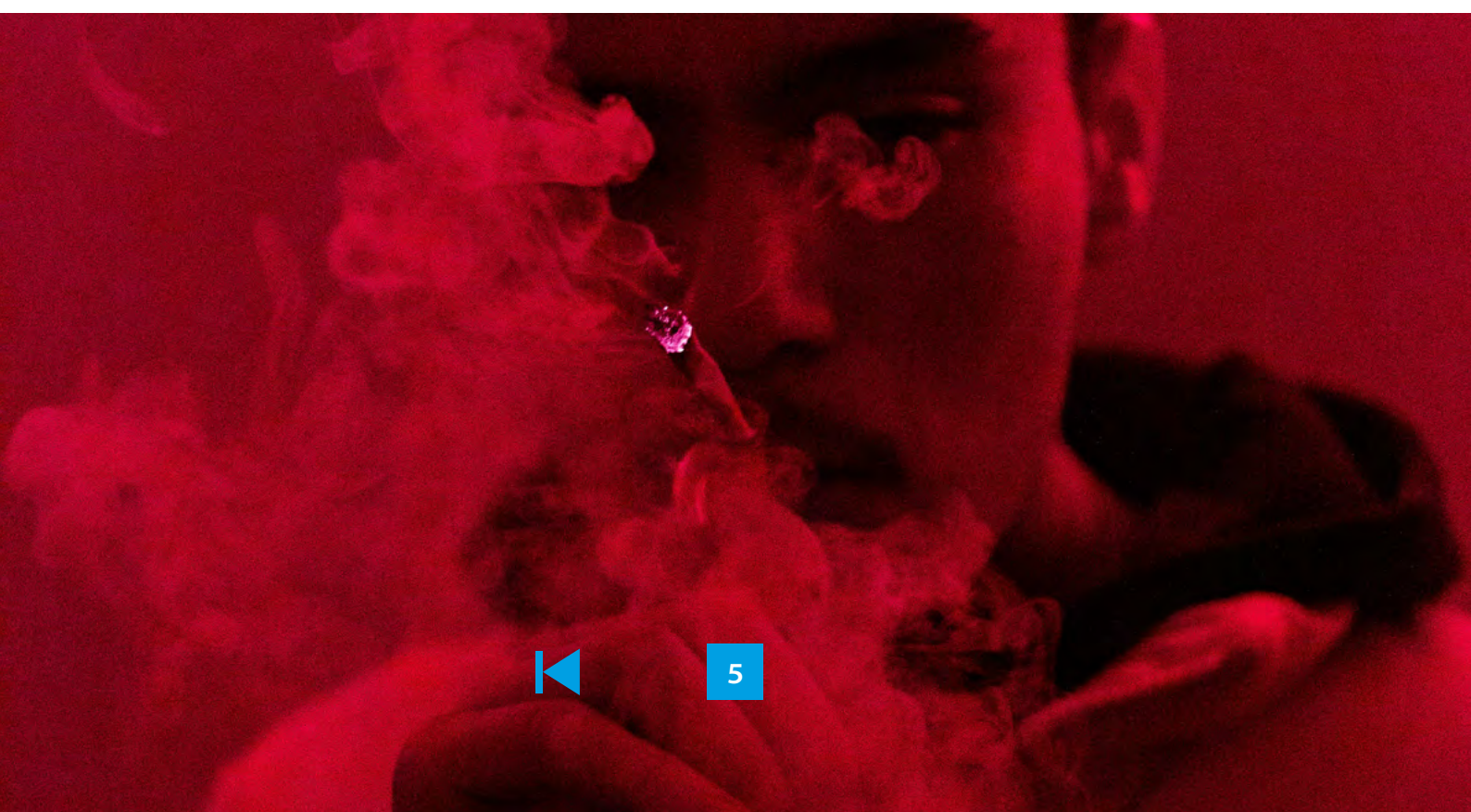
Vape prices on the Dutch market vary widely. The price depends on the type of vape, the amount of e-liquid in it, and whether cannabis-containing liquids are used. On average, users spend between €8 and €20 on vapes or refill liquids. The table below shows the average purchase price for each type of vape and its accessories.

Table 1 - The average price per type of vape

Type vape	Average price
Disposable vape	€ 10,50
Refillable vape	€ 18,50
Refill fluid	€ 8,00
Other	€ 54,70

## The market in euros

The analyses and calculations in this study suggest that Dutch consumers spend around €280 million per year on vapes, with approximately €257 million spent on illegal vapes. These are estimates and should be interpreted with caution. Detailed calculations are available in the full research report at [bureaubeke.nl](https://bureaubeke.nl) (Dutch only).



# Legal and illegal channels of the vape trade

The (illegal) vape market is complex. There are various stages of trade: production and export, import, distribution, resale, and sale to the end user in the Netherlands. At each stage, we distinguish between multiple channels through which vapes are imported, distributed, traded, and ultimately reach the end user.

## Production and export

The production and export of vapes available to Dutch users appear to take place mainly in and from China. Respondents consulted, and other sources are virtually unanimous on this point. Customs authorities also express concerns about alternative production locations, specifically the emergence of illegal vape factories in Eastern Europe and the possibility that they could also arise in the Netherlands.

## Import and storage

Illegal vapes enter the Netherlands mainly through two channels:

1. Online shops selling from abroad (importers, dealers, consumers), and;
2. Purchases in physical stores abroad by Dutch consumers.

Vape users may also acquire vapes through personal contacts abroad, though this channel is less evident in research.

When large illegal vape orders are placed (thousands at a time), a storage location is needed. These locations are not always known. Sometimes storage takes place in warehouses on industrial estates, containers, or shops. Between November 2024 and mid-2025, respondents reported that the Netherlands Food and Consumer Product Safety Authority (NVWA) – the designated regulator of the vape trade – discovered between ten and fifteen warehouses for illegal vapes.

## Distribution and sales to the end user

For further distribution and consumer sales, we identify a variety of sales channels. The population questionnaire gives us a rough estimate of the volume per channel. Most vapes are sold in physical stores in the Netherlands, followed by online webshops and physical stores abroad.

Unlike the quantitative results, the qualitative research results show that buying and selling vapes via social media and street dealers is common, mainly among young people. Interviewed professionals express serious concerns about social media's role in the vape trade. Social media analysis confirms vapes are widely available for sale. Youth workers and police officers have observed that social media is a frequent trading platform for vapes. The study's numerical estimates for these channels likely represent at least the lower limit of their real sizes.

*“A lot of young people are in group chats on Snapchat, where it is posted in groups. [...] They see it whether they want to or not.”*

*(translated, Ro2, youth worker)*

## Actors in the supply chain

Various actors are involved in the illegal vape trade chain. We distinguish these actors based on different research results. These are not fixed 'profiles', but they give a clearer picture of who may be involved in the illegal vape trade. The boundaries between actors can overlap or merge. This means that different actors can exhibit the characteristics of others or change roles. The following table provides an overview of these actors.

Actor	Importer
<i>Motivation</i>	<ul style="list-style-type: none"> <li>• Promising revenue model with high profit potential</li> </ul>
<i>Characteristics</i>	<ul style="list-style-type: none"> <li>• Access to significant financial capital and opportunities for storage</li> <li>• Age: young adults aged 18 and above</li> <li>• Positioned at the top of the hierarchical chain</li> </ul>
<i>Purchasing channels</i>	<ul style="list-style-type: none"> <li>• International webshops</li> <li>• Personal contacts abroad</li> </ul>
<i>Scale</i>	<ul style="list-style-type: none"> <li>• Volumes range from tens of thousands to hundreds of thousands of vapes</li> </ul>
<i>Customers</i>	<ul style="list-style-type: none"> <li>• Part of a larger trading network</li> <li>• Involves transactions with other entrepreneurial dealers</li> <li>• Recruiting new customers</li> </ul>

Actor	Entrepreneurial dealer
<i>Motivation</i>	<ul style="list-style-type: none"> <li>• Promising revenue model with high profit potential</li> </ul>
<i>Characteristics</i>	<ul style="list-style-type: none"> <li>• Financial capital and storage capacity are at average levels</li> <li>• Age: adolescents and young adults aged 15 and above</li> </ul>
<i>Purchasing channels</i>	<ul style="list-style-type: none"> <li>• Foreign webshops and e-commerce platforms</li> <li>• Personal contacts abroad</li> <li>• Importers or through the hierarchical distribution chain</li> <li>• Physical stores located abroad</li> </ul>
<i>Scale</i>	<ul style="list-style-type: none"> <li>• Volumes range from several hundred to several thousand vapes</li> </ul>
<i>Customers</i>	<ul style="list-style-type: none"> <li>• End users of vapes, including classmates, friends and acquaintances</li> <li>• Recruiting new customers</li> <li>• Subcontractors (for further distribution)</li> <li>• Vulnerable dealers (for further distribution)</li> </ul>

<b>Actor</b>	<b>Subcontractor</b>
<i>Motivation</i>	<ul style="list-style-type: none"> <li>• Promising revenue model with high profit potential</li> </ul>
<i>Characteristics</i>	<ul style="list-style-type: none"> <li>• Moderate financial capital and storage capacity</li> <li>• Age: adolescents and young adults (14 years and older)</li> </ul>
<i>Purchasing channels</i>	<ul style="list-style-type: none"> <li>• Entrepreneurial dealers</li> </ul>
<i>Scale</i>	<ul style="list-style-type: none"> <li>• Volumes range from several dozen to several hundred vapes</li> </ul>
<i>Customers</i>	<ul style="list-style-type: none"> <li>• End users of vapes, including classmates, friends and acquaintances</li> <li>• Vulnerable dealers (for further distribution)</li> </ul>

<b>Actor</b>	<b>Vulnerable dealer</b>
<i>Motivation</i>	<ul style="list-style-type: none"> <li>• Promising revenue model to meet individual financial needs</li> </ul>
<i>Characteristics</i>	<ul style="list-style-type: none"> <li>• Limited financial capital and restricted storage options</li> <li>• Minimum age: 10 years old</li> </ul>
<i>Purchasing channels</i>	<ul style="list-style-type: none"> <li>• Entrepreneurial dealer</li> <li>• Subcontractor</li> <li>• E-commerce</li> </ul>
<i>Scale</i>	<ul style="list-style-type: none"> <li>• Volumes consist of several dozen vapes</li> </ul>
<i>Customers</i>	<ul style="list-style-type: none"> <li>• End users of vapes, including classmates, friends and acquaintances</li> </ul>

<b>Actor</b>	<b>Casual dealer</b>
<i>Motivation</i>	<ul style="list-style-type: none"> <li>• Intended for personal use and sharing within one's social circle</li> </ul>
<i>Characteristics</i>	<ul style="list-style-type: none"> <li>• Limited to moderate financial capital and restricted storage capacity</li> <li>• Minimum age: 8 years old</li> </ul>
<i>Purchasing channels</i>	<ul style="list-style-type: none"> <li>• International webshops</li> <li>• E-commerce platforms</li> <li>• Physical stores located abroad</li> </ul>
<i>Scale</i>	<ul style="list-style-type: none"> <li>• Volumes consist of dozens of vapes</li> </ul>
<i>Customers</i>	<ul style="list-style-type: none"> <li>• Distribution is limited to friends, family members or colleagues</li> </ul>

<b>Actor</b>	<b>Festival dealer</b>
<i>Motivation</i>	<ul style="list-style-type: none"> <li>• Promising revenue model</li> </ul>
<i>Characteristics</i>	<ul style="list-style-type: none"> <li>• Unknown financial capital and storage options</li> <li>• Minimum age: 20 years old</li> </ul>
<i>Purchasing channels</i>	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>
<i>Scale</i>	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>
<i>Customers</i>	<ul style="list-style-type: none"> <li>• End users, specifically festivalgoers</li> </ul>

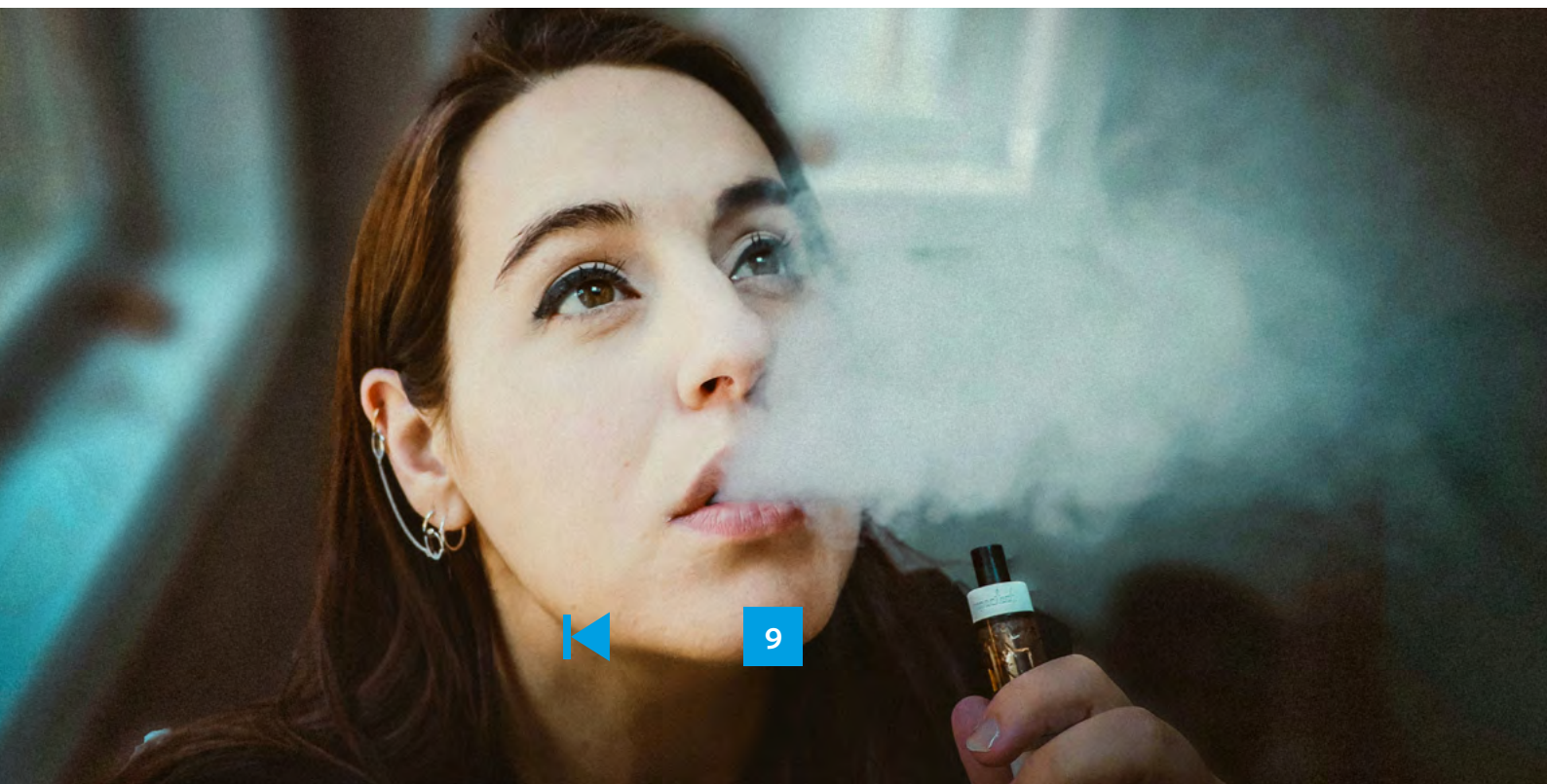
All in all, there is a certain interdependence, with one actor serving as a supplier or (transit) link for the other, creating a trade chain that sustains itself.

*“A boy we’ve caught several times is at it again, getting fourteen- and fifteen-year-olds to drive for him.” (translated, R27, police)*

*“It’s not that I want to make a lot of money from it, it’s more for the convenience of friends or colleagues so they don’t get ripped off in shops. It’s also not that I have packages of vapes lying around to sell, I buy them when it suits me.” (translated, DRo1, vape dealer)*

## The buyers

The “buyers of illegal e-cigarettes” comprise a wide range of individuals. The buyer of an illegal vape is one of the aforementioned actors (such as a dealer), but also the consumer (end user). Here, we focus on the end user of the illegal vape. Previous studies have shown that minors and young adults in particular use vapes. In this study, vape use also appears to be common among (young) adults, which is at odds with the findings of existing studies and the social image. The results of this study may be distorted because we surveyed a specific research panel. For a more detailed explanation, please refer to the full report. All in all, it is clear that the greatest concerns lie with use among minors.



# Risk and protective factors

The risk factors and protective factors surrounding the illegal trade in vapes among young people have also been identified. The analysis shows that this form of trade cannot be viewed in isolation from broader mechanisms that are also evident in (organized) (youth) crime.

## Risk factors

The following risk factors play a role:

- The low-threshold availability and attractive presentation of vapes, including on social media;
- The social dynamics of peer pressure and status acquisition;
- The vulnerability of young people struggling with poverty, limited resilience, or a lack of supervision by parents or at school.

These circumstances lower both the moral and 'legal' threshold for young people and adults to engage in the illegal vape trade. These characteristics also ensure that young people see the trade not only as attractive but also as a relatively safe and lucrative way to earn money. We see that financial gain is the common thread in the motivation to become involved in the vape trade; this applies to all actors except the 'casual dealer'. This seems to be mainly driven by the desire to supply one's own use and convenience.

*“They want to make money quickly and choose the easiest route with the least punishment in their eyes, namely selling vapes.”(translated open answer, social workers questionnaire)*

*“A vape dealer wanted to get out of this world [of vape dealing]. So he sold his phone, which contained his entire network. And he got €11,000 for it. A new dealer bought it, also around that age.” (translated, R03, youth worker)*

## Protective factors

Simultaneously, protective factors can significantly contribute to prevention. These factors may reduce the likelihood of individuals engaging in illegal vape trading or may deter them from doing it:

- Personal moral beliefs
- Looking for a positive identity
- Social support figures such as parents, youth workers, or coaches
- The availability of future prospects through school or work



## Link to organized crime

Based on the analyses, the relationship between the illegal vape trade and other forms of crime appears to be nuanced and multifaceted. Professionals see different forms and degrees of involvement among young people:

- For most young people, the vape trade seems to be a ‘side hustle’: a way to earn a lot of money quickly.
- Some young people seem to consciously choose to stick to the vape trade. For them, the vape trade is more of a source of extra income or an entrepreneurial activity than a stepping stone to organized crime. Moreover, young people seem to consider the risk of being caught and the ‘penalties’ for selling vapes to be very low, especially in comparison to drug dealing. The trade is therefore often not perceived as ‘crime’, but as a relatively harmless or socially less serious alternative.
- Vape trade can go hand in hand with illegal markets, such as trade networks in which, for example, counterfeit branded clothing, perfume, fireworks, snus, or soft drugs are sold. It is unclear whether vape trading is a starting point for young people to trade in other prohibited goods, or whether vape trading is a next step from previous trading in illegal goods. However, it is clear that there may be parallel trading networks.
- Signs of a rarer and ‘serious’ gradation are that young people develop skills that can be used for other illegal trading practices. Think, for example, of logistical skills and customer acquisition, which can make the step to more serious trading or other types of trading easier.

In all cases, respondents expressed their concerns about mixing with illegal markets or the risks of involvement in them.

*“We see young people who just think, hey, I’m talented at this, I can make so much money with this, and then make the switch to delivering packages.*

*And then, of course, the profit margin is many times greater.”*

*(translated, R32, youth work)*

## Exploitation of young people

In unique but nonetheless worrying cases, youth workers and street coaches see young people from vulnerable backgrounds – for example, those with debts, an unstable home situation, or a mild intellectual disability – being approached or recruited by older individuals active in the criminal world. These young people are less able to assess the long-term consequences of involvement in the vape trade. Occasionally, reports surface of young people being pressured by individuals higher up in the hierarchy to move into riskier markets. It can be concluded that exploitation within the illegal vape trade is not a widely known phenomenon, but there are signs and, in particular, concerns that young and vulnerable people are at risk.



# Recommendations

The study shows that people who vape mainly use illegal vapes, that people who trade in vapes see little risk, and that the chance of getting caught is low. Enforcing the ban on the illegal vape trade is therefore not so easy. Due to differences in legislation and regulations within Europe, it remains relatively easy to obtain vapes that are not permitted in the Netherlands via neighboring countries or by ordering them online from other (distant) countries. What further complicates enforcement is that possession of illegal vapes is not prohibited: only the sale of vapes is an offense. In recent years, the national government has been working on various (additional) measures, including the Action Plan against Vaping. This plan focuses primarily on expanding the administrative enforcement powers of the Netherlands Food and Consumer Product Safety Authority (NVWA) and cooperation with other public partners, revising the European Tobacco Products Directive, preventing people from starting to vape, and encouraging people to stop vaping.

Based on all the research results, recommendations are grouped into three themes: policy and enforcement, approach per actor, and further research. For each theme, the perspectives for each action point are listed. For full details and follow-up research, please refer to the full report.

## Policy and enforcement

The trade in vapes is enforced through administrative law, but bears similarities to drug trafficking, which is enforced through criminal law. As long as vapes are not covered by the Opium Act (prohibited substances), there are limited options from a criminal law perspective. Violations of the rules on vapes are included in the Economic Offenses Act, so that the police and the Public Prosecution Service (in addition to the NVWA) are also authorized to take action against them. However, these powers are limited as long as vapes and their trade are not classified as a criminal offense. It is also highly questionable whether this is desirable. Young people who trade in vapes and are caught doing so will end up with a criminal record, with all the consequences that entail. Limited capacity and priority at the Public Prosecution Service and the courts are also complicating factors for criminalization. Moreover, a total ban on vapes will not combat illegal trade; trade in the illegal circuit and health risks are then likely to increase. Combating trade should rather be sought in prevention and enforcement.

*“What is very strange is that there is now a product category that is regulated by administrative law, but increasingly has criminal characteristics. Not with large cartels, but it does take the form of dealers and warehouses and unrecorded accounting.” (translated, Ro6, NVWA)*

### *Capacity and division of roles in enforcement*

- In order to take the enforcement of illegal vapes seriously, more capacity should be made available for this purpose at various parties, such as the NVWA and the police.
- Given the various forms of vape trade that are linked to subversive and criminal drug trafficking practices, consideration should be given to whether and how the powers of the NVWA can be expanded to facilitate enforcement. It should also be considered whether the NVWA is the only appropriate party for enforcement, or whether other parties, such as the police and Customs, should be given a more prominent role.
- The police could also play a greater role in enforcement, as they regularly encounter illegal vapes in practice. It is recommended that they receive clear instructions across the organization on how to deal with vapes.
- Enforcement should generally focus on shops, importers, and online (private) sales.

### *Excise duty and task force deployment*

- In the Netherlands and across Europe, plans are underway to introduce a usage tax on vapes, similar to the excise duty on cigarettes. Since this study has shown that the vast majority of the market is illegal (87%), excise duty will not solve the problem of illegal trade and may even increase it. However, excise duty will make enforcement by Customs clearer and easier when vapes are found. It will then be clear that vapes may only be released for free circulation upon payment of excise duty, which can be directly traced from the presence or absence of a stamp.
- For both excise duty enforcement and broader vape trade enforcement at the national level, the deployment of a specific task force could also be considered, with a multidisciplinary team from the NVWA, police, Customs, and the Fiscal Information and Investigation Service (FIOD). This task force could focus on both online and offline trade and on the various roles recognized among the actors, with attention also paid to excise duty enforcement.
- Capacity will need to be made available for such a task force (depending on the priority given to it).
- At the local level, the NVWA may be able to join administrative intervention teams and, as is already the case in some municipalities, collaborate with local special investigating officers.

- Inspections can also be carried out based on reports from citizens. The NVWA has a reporting center where citizens can report violations in the area of vapes. Citizens can be encouraged to report signs of the vape trade.

#### *Responsibility of social media platforms*

- Given the online sales and the ease with which young people encounter advertisements for vapes, social media platforms should also take responsibility for combating illegal trade (see chapter 2, “Dark clouds”).

#### *Increase administrative fines*

- The current fines are ineffective given the profit margins of vape sales. To hit vape traders where it hurts and stop them trading, the fines should be significantly increased, as proposed in the Action Plan against Vaping. Appropriate fines can be determined based on the profit margins of the various actors, ensuring they have a real impact and a deterrent effect.
- The NVWA currently fines a maximum of five violations per inspection (for example, five flavors other than tobacco). This maximum number could be increased, so that not only would the fines logically be higher, but the impact of enforcement would also be greater.

#### *Harmonization of rules within the EU*

- Experts view “the tobacco industry” and especially “China” as instigators/primary facilitators of illegal vapes in the Netherlands. It is utopian to think that vapes can be kept out of the Netherlands with the current laws and regulations. Different rules regarding legal vapes in neighboring countries cause confusion and make it easy to circumvent the rules applicable in the Netherlands. Harmonized rules within the EU could create barriers to the easy availability of illegal vapes and also facilitate enforcement.
- It is up to the EU to urge China to combat the export of illegal vapes; flavored vapes are banned in both China and the Netherlands, yet they are still produced in China and exported to the Netherlands.

#### *Focus on prevention*

- The best way to prevent trafficking is to focus on prevention: decrease demand for vapes. There will always be demand for ‘prohibited’ substances, as new forms of drugs or other stimulants continue to emerge. Still, given the health risks and high addiction potential of vapes, preventing vaping, especially among minors, is extremely important.

## Approach per actor

The study identified various actors in the trade, each with its own characteristics. Although actors may be intertwined or share overlapping traits, we still see enough distinction to make targeted recommendations for each group involved in the vape trade. We make recommendations for each actor (dealer), for whom different authorities may be responsible.

### *Measures for vulnerable dealers*

- This dealer profile would be highly suitable for implementing preventive measures, given the predominantly young age group and its associated vulnerability. Consider, for example, embedding the approach within local person-oriented approaches (PGA) or *Prevention with Authority* (PMG) interventions. According to this study, these young people are well known to professionals such as youth workers. They are very likely to have an overview of the young people who could be eligible for these preventive measures. The responsible party in this case will be the municipality.
- It is important that municipalities in the Netherlands are aware of the seriousness of the problem (vape trade) and put this phenomenon on the agenda within the departments that are responsible for care, safety, and youth. Not only is it important that they pay attention to the vape trade in their policies, but in practice (such as youth work, family protectors, and the like), attention must also be paid to identifying the vape trade, especially given that it can be mixed with other illegal goods.
- Some young people are also victims because they are being exploited. Therefore, an approach from a healthcare and social perspective is appropriate, and the focus should be on prevention and awareness of the health risks of vaping. This can take the form of early detection, protection, and education.

### *Measures for casual dealers*

- Casual dealers benefit more from a different approach, partly because they are an older age group who have entered the trade for reasons other than financial gain. These dealers mainly trade to supply their own use. To prevent this type of dealer from emerging and to ensure that continuing to trade remains unattractive, it is important that the risks outweigh the benefits and that purchasing vapes becomes more difficult.

### *Measures for the entrepreneurial dealer*

- The entrepreneurial dealer is harder to advise. People in this vape trade role are used to certain incomes and work styles, so preventive measures have little impact. Their biggest motivator—the desire to make a lot of money fast—is also the most complicated factor. According to young people, legal ways to earn money offer almost nothing. This is a wider social problem; many young people share this view, and it’s hard to counter.
- Because these dealers are mainly motivated by financial gain, increasing detection and acting quickly—by issuing fines for violations—could help stop them from trading in vapes. Targeting their profits through administrative or criminal penalties may show that illegal trade is not profitable in the long run. Yet, this message must be clear; current fines usually amount to minor losses compared to the high profits made by enterprising dealers.

### *Measures for importers, subcontractors, and festival dealers*

- It is difficult to identify specific measures for importers, subcontractors, and festival dealers, mainly due to a lack of insight into their personal characteristics, exact roles within the trade chain, and the networks in which they operate. Given the organized nature of these actors, measures should focus on surveillance, detection, and enforcement. This will be addressed in more detail in the full report as part of follow-up research.

# Colophon

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Ministry of Health, Welfare and Sport

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Page 1: Claudia Ramirez and Kristin Karlsen, page 5 Arthur Humeau, page 9: Elsa Oloffson, page 11: Wild Vibes, page 13: Antonin Fels, all via Unsplash. The people depicted are not related to the study.

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## Summary

### Dark clouds

#### A preliminary exploration of the illegal vape trade in the Netherlands

This study was commissioned by the Ministry of Health, Welfare, and Sport.

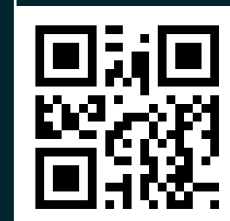
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