

## Statement on the End of Transitional Periods under MiCA

ESMA issues this statement to clarify supervisory expectations regarding the end of the transitional period(s) under the Markets in Crypto-Assets Regulation ((EU) 2023/1114 (MiCA)). In its previous statements on supervisory convergence (October 2023)<sup>1</sup>, transitional measures (December 2024)<sup>2</sup>, and the end of transitional periods (December 2025)<sup>3</sup>, ESMA has consistently emphasised the importance of timely authorisation, orderly transition, and client protection.

The MiCA transitional period will officially expire across the EU on **1 July 2026**. After this date, any entity providing crypto-asset services to EU clients without a MiCA licence will be in breach of EU law and must cease offering such services.<sup>45</sup>

### Expectations for CASPs on Wind-down and Client Migration

In its statement of 4 December 2025, ESMA set out the expectation that CASPs should have orderly wind-down plans in place, ready for implementation ahead of the end of the transitional period in the respective Member State if authorisation is not obtained by that date. ESMA expects that:

- **Wind-down plans enable an orderly exit without causing undue economic harm to clients**, including by arranging the offboarding of clients – for example by organising the transfer of crypto-assets held on their behalf to an authorised CASP or to a self-hosted wallet. CASPs should provide existing clients with prior notice before implementing the wind-down plan. Plans should be operational, credible, and immediately executable and designed in accordance with all relevant EU conduct, prudential and AML/CFT obligations.
- **By 1 July 2026**, when the transitional period ends across the EU, **any unauthorised CASP must have implemented its wind-down plan**.

ESMA also expects authorised CASPs to **actively manage the migration of existing clients** ahead of 1 July 2026. In particular, authorised CASPs should take the necessary steps to onboard existing EU clients before the end of the transitional period. In doing so, ESMA

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<sup>1</sup> [ESMA74-449133380-441 Statement on MiCA Supervisory Convergence](#)

<sup>2</sup> [ESMA75-453128700-1396 Statement on MiCA transitional measures](#)

<sup>3</sup> [ESMA75-113276571-1631 Statement on end of MiCA transitional periods](#)

<sup>4</sup> Two categories of entities were not permitted to provide crypto-asset services even before 1 July 2026: first, entities that did not provide crypto-asset services in accordance with applicable national law before 30 December 2024 and therefore could not rely on the transitional regime; and second, entities active in Member States where the transitional period had already ended before 1 July 2026.

<sup>5</sup> This applies irrespective whether the MiCA has been implemented in a Member State or not.

expects authorised CASPs to apply robust onboarding processes to ensure full compliance with applicable AML/CFT requirements.

In this context, ESMA reminds market participants that **entities established outside the EU are**, outside the narrow exception of reverse solicitation, **not permitted to provide crypto-asset services that qualify as MiCA services to EU investors or to solicit EU clients with a view to provide MiCA services to them**. For clarity, this also applies in a business-to-business context, as MiCA specifically prohibits CASPs from outsourcing or delegating certain services, namely custody, to entities not authorised as CASPs themselves. CASPs should ensure that all outsourcing and delegation arrangements are fully compliant and do not result in services being provided to EU clients via unauthorised third-country entities.

### **Expectations for National Competent Authorities (NCAs)**

NCAs play a key role in ensuring effective and convergent supervision across the Union, both ahead of and following the end of the transitional period. In particular, they are expected to:

- **Verify the existence and adequacy of orderly wind-down plans** for unauthorised CASPs, and **ensure these are implemented** in a timely manner without causing undue economic harm to clients.
- **Take action against the unauthorised provision of crypto-asset services** following the end of the transitional period, in cooperation with other competent authorities where appropriate.
- **Scrutinise client migration strategies**, ensuring that authorised CASPs take timely steps to onboard EU clients currently or previously serviced by unauthorised CASPs (including unauthorised group entities), ensuring unauthorised CASPs do not continue business-as-usual activities beyond the transitional period.

Supervisory convergence remains a key priority, and ESMA will continue to coordinate with NCAs to ensure a harmonised application of MiCA across the EU.

### **Warning for Consumers**

ESMA wishes to warn investors engaging with crypto assets that **not all providers are authorised under MiCA after 1 July 2026**, and that your protections depend on who you are dealing with.

- **Verify your provider.** Check that the company you are using is listed as authorised in the [ESMA Interim MiCA Register](#) before you invest or transfer funds.
- **Know exactly who you are dealing with.** MiCA protections only apply to the specific authorised legal entity in the EU – not to other companies of the same group, and not to non-EU entities. Although providers should serve EU clients through their EU

authorised entities only, they may operate under the same brand across multiple companies or countries. Review your contract carefully to confirm which entity is actually providing your service.

- **Take action if needed.** If your provider is not authorised, act promptly – transfer your crypto assets to an authorised provider or a self-hosted wallet, or consider closing your positions. Staying with an unauthorised provider may mean less legal protection and a greater risk of losing access to your assets.