

January 2025

Bridging the gap: are CASPs ready for MiCA's sustainability requirements?

MiCA CASP Sustainability Readiness Assessment
A snapshot survey

Supported by



Executive summary

In December 2024, crypto sustainability pioneer Zumo conducted a snapshot survey designed to assess the preparedness of Crypto-Asset Service Providers (CASPs) for the EU's incoming Markets in Crypto-Assets (MiCA) regulation, with a special focus on sustainability requirements.

Building on existing conversations and round-table engagement with a range of CASPs active in the EU, this survey report provides an early quantitative industry snapshot designed to inform key stakeholders on industry-side MiCA preparedness and provide an overview of the state of play in sustainability compliance reporting for crypto-assets in the MiCA environment.

Key findings

1. A clear sustainability compliance knowledge gap.

Whilst three quarters of surveyed VASPs considered themselves 'very familiar' with MiCA regulation, less than a third say they are 'knowledgeable' about MiCA sustainability obligations.

2. A demand for continued regulatory liaison.

Regulatory communication is both the number one pain point (unclear regulatory requirements) and number one request (clearer and more detailed guidance) articulated by the industry to help it meet MiCA sustainability compliance requirements.

3. A need for deliberate follow-through action.

Comparative industry-side sentiment around risk quantification and regulatory liaison suggests that sustainability policy outcomes are unlikely to be achieved without further regulatory engagement.

4. A requirement to promote industry solutions.

Half of industry participants felt a lack of ready-made solutions were a blocker in their efforts to achieve MiCA sustainability solutions - despite such solutions already being available in the open market.

5. A willingness to comply.

Despite challenges, businesses are still looking to comply, and comply quickly, with MiCA provisions, with over two-thirds of surveyed CASPs expecting to achieve full MiCA compliance within a six-month window.

Overall, we conclude that ongoing action is needed to make sure CASPs are 'brought along' in the sustainability journey.



“MiCA sustainability disclosures are just one step in the path to making the industry sustainable.”

Peter Kerstens
DG FISMA, European Commission

Zumo remains committed to offering accessible and implementable sustainability solutions that bridge the gap that can exist between regulatory text and industry-side implementation. We also continue to liaise carefully with relevant regulators and policymakers to ensure that information asymmetries are reduced and that the industry is given the information and guidance to understand its obligations as clearly as possible.

Doing so successfully means continuing to work to bridge the knowledge gap that currently exists around the MiCA sustainability topic, and leveraging the experience Zumo and others bring to help situate and embed MiCA's requirements within the larger sustainability conversation. As an ongoing shift in mindsets and in business practice in a nascent sector, this is what sets the scene for a long-term sustainable digital economy.

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About the author

Zumo: a pioneer in sustainability

Active in the crypto space since 2017, Zumo has been a pioneer in taking and coordinating action addressing the carbon footprint arising out of cryptoasset activities.

Its report series dating back to 2021 has investigated and communicated practical strategies for tackling the environmental impacts of cryptoassets in an informed and strategic way. The company is a key contributor to industry guidance on the decarbonisation of digital assets, engaging globally with regulators and standard setters, with its knowledge sought after in forums from the WEF to OECD and featuring in well-known media from Bloomberg to CNBC.

Following UK government funding to continue its research, Zumo launched its-award winning Oxygen platform, a done-for-you solution to comply with current and future crypto sustainability regulations, including MiCA disclosures, and help the industry to adopt sustainable practices.

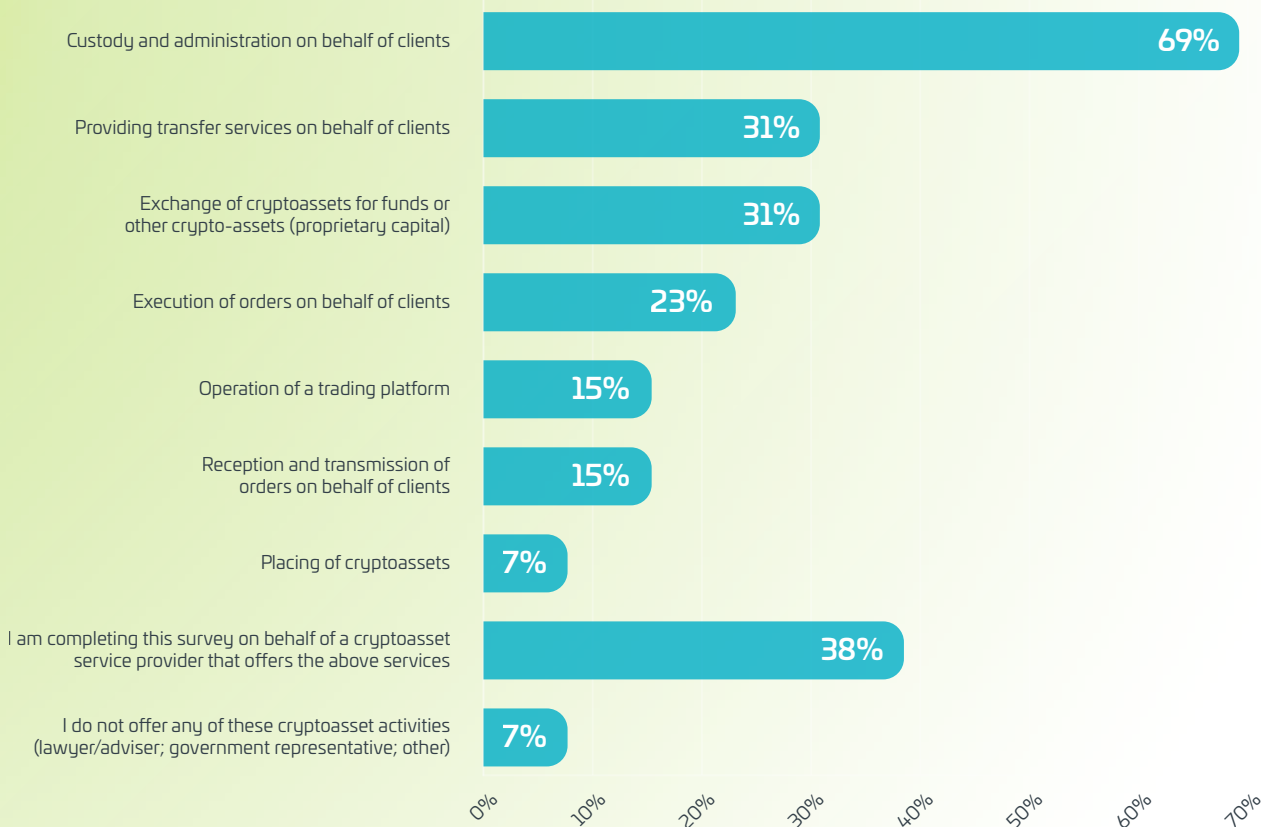
Introduction

The Markets in Crypto-Assets (MiCA) regulation significantly impacts the cryptoasset industry, introducing comprehensive rules for service providers, including sustainability-related requirements. To better understand industry readiness and challenges, in December 2024 Zumo conducted a snapshot survey targeting key stakeholders, specifically CASPs. As a leading digital asset platform committed to driving sustainable innovation in the crypto space, Zumo is uniquely positioned to explore the intersection of regulation and sustainability. This report outlines the findings, highlighting areas of concern, opportunities, and actionable insights for navigating MiCA compliance. By initiating this survey, Zumo aimed to identify the industry’s preparedness, understand the key obstacles to compliance, and foster a deeper dialogue around sustainability practices within the crypto ecosystem. The findings will not only inform Zumo’s strategic direction and the suite of products it provides to businesses to support sustainable digital asset innovation but also provide valuable insights for the broader industry.

The snapshot survey builds on several months of ongoing dialogue and round-table discussions in different European countries with some of the continent’s largest CASPs, as well as recent engagement with ESMA and the European Commission. It collected responses from 16 leading CASP stakeholders, representing a range of company types, including custodians, trading platforms, and service providers offering exchange and transfer services. Among the respondents, a significant number provided custody and administration services on behalf of clients, while others operated trading platforms or focused on exchange and transfer services. Several respondents reported engaging in multiple activities, reflecting the diverse operational scopes of CASPs surveyed. The data also included responses from individuals who identified as legal advisors or representatives of other stakeholder categories, rather than CASPs directly.

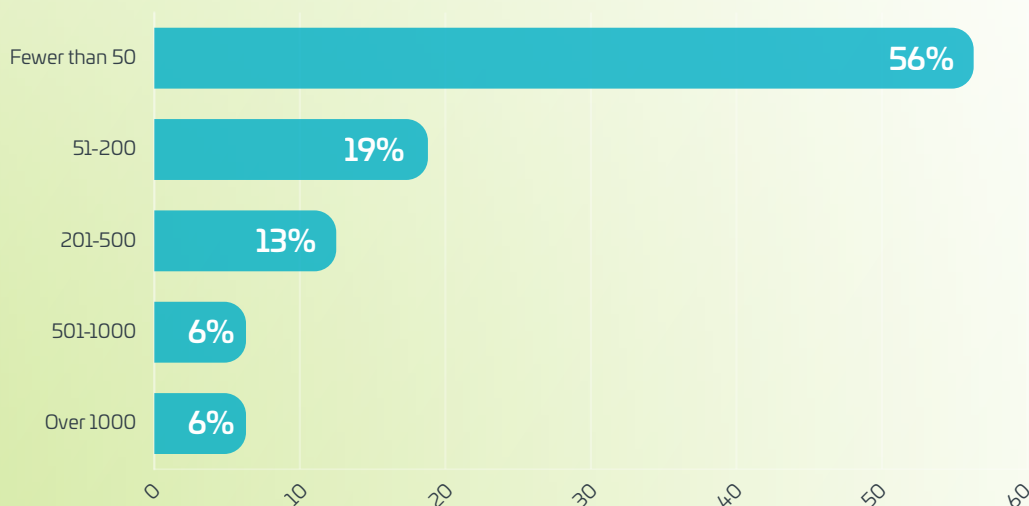
Respondent cryptoasset activities by category

Multiple choice



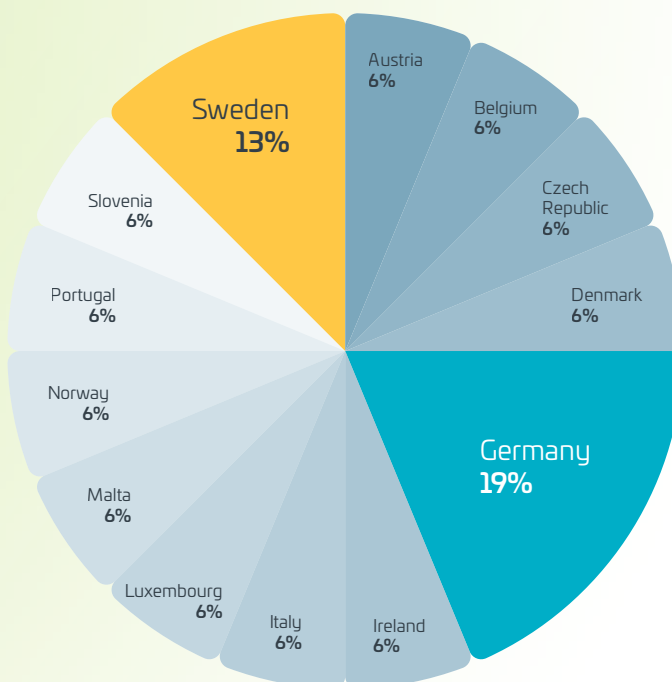
The participants were drawn from organisations of varying sizes. The majority were small-scale entities, with slightly more than half having fewer than 50 employees. A significant proportion were mid-sized organisations with 51-200 employees, while some participants represented larger organisations in the 201-500, 501-1,000 and over 1,000 employee brackets. These responses reflect the diversity of operational scales within the surveyed CASPs and MiCA operating environment.

Respondent organisation size by number of employees



In terms of the EU member states in which respondents were currently registered or planning to seek MiCA authorisation, a wide range of jurisdictions were represented including Portugal, Belgium, Slovenia, Italy, Germany, Czech Republic, Ireland, Luxembourg, Malta, Denmark, Sweden, and Austria, as well as EEA member Norway.

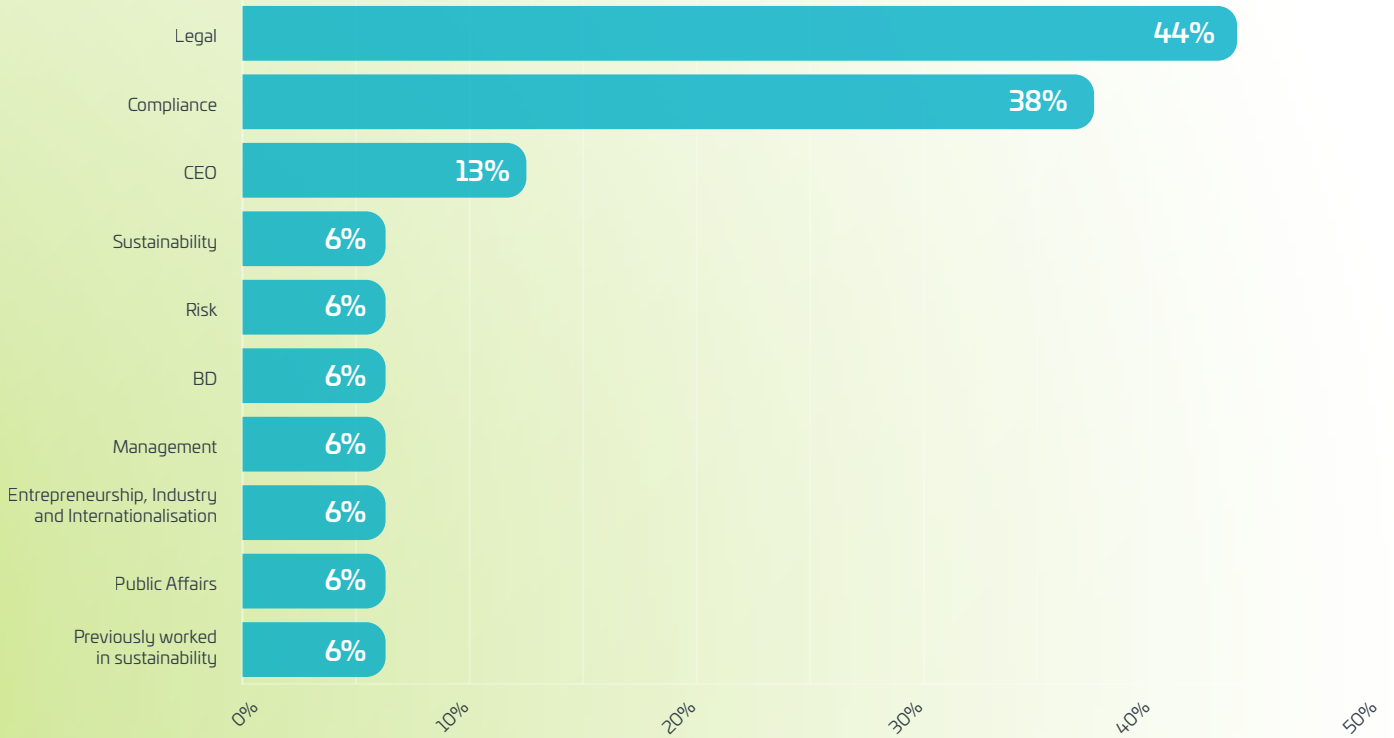
Respondent registered jurisdiction/planned jurisdiction for MiCA authorisation



Finally, the roles of the individuals that responded to the survey spanned compliance, legal advisory, executive leadership, sustainability and risk management.

Respondents by job function

Multiple choice



Key Findings

The survey highlighted several critical insights into the preparedness of CASPs for MiCA compliance.

- 1. MiCA awareness snapshot: majority claim high familiarity with regulation**

A majority of respondents (75%) reported being “Very Familiar” with MiCA, while 13% indicated they were “Somewhat Familiar,” and another 13% described themselves as “Familiar”.
- 2. Compliance journey: mixed progress toward MiCA readiness**

When asked whether their organisation had taken any steps towards complying with MiCA regulations, 31% reported being fully compliant, 38% indicated they were partially compliant, and 31% stated they were currently planning compliance initiatives.
- 3. Diverse awareness levels of MiCA sustainability mandates revealed**

Awareness of MiCA’s sustainability-related requirements was varied, with 31% indicating they were “Knowledgeable,” 50% reporting being “Aware,” 13% describing themselves as “Somewhat Aware,” and 6% stating they were “Not Aware at All.”
- 4. Steps toward sustainability disclosure compliance: a work in progress**

When asked about steps taken to comply with the MiCA CASP sustainability disclosure requirement, 25% of respondents reported they were already prepared to be compliant, 63% indicated they were currently exploring compliance options, and 13% stated they had not taken any steps yet.

5. Maturity gap: sustainability disclosure at earlier compliance stage

Interestingly, this meant that a significantly greater proportion of market participants (63%) reported being at the compliance exploratory stage in relation to MiCA CASP sustainability disclosure requirements than is the case for the MiCA framework as a whole (where only 31% reported being at the compliance planning stage).

6. Top barriers to sustainability compliance: complexity and lack of solutions dominate

Unclear regulatory requirements and expectations were the most frequently cited challenge in achieving MiCA sustainability compliance, mentioned by 50% of respondents, with the same proportion highlighting the lack of ready-made industry solutions. Additionally, approaching two-fifths of respondents (38%) highlighted the resource required to address the requirements as a significant barrier, while around a third (31%) pointed to the lack of available information.

7. Non-compliance risks loom: reputational damage tops the list

Reputational damage (75%) was identified as the most significant risk of MiCA non-compliance, followed by financial penalties (69%) and regulatory sanctions resulting in lost customers or revenue (69%). Loss of customer trust (31%) was also highlighted as a notable concern.



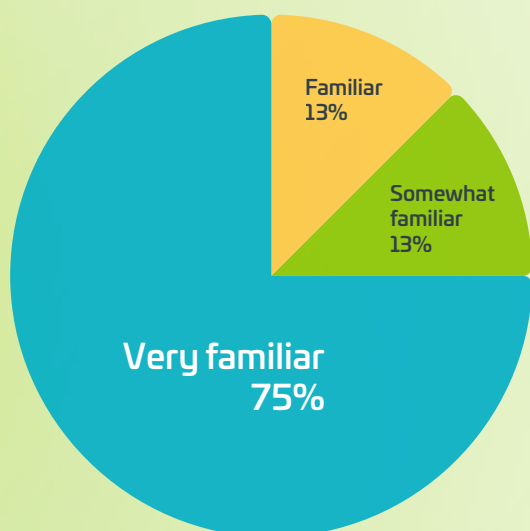
Peter Kerstens
DG FISMA, European Commission

“Only by making fair and proper disclosures, based on solid methodology and (scientific) evidence, can consumers and investors take decisions based on their own sustainability preferences and priorities.”

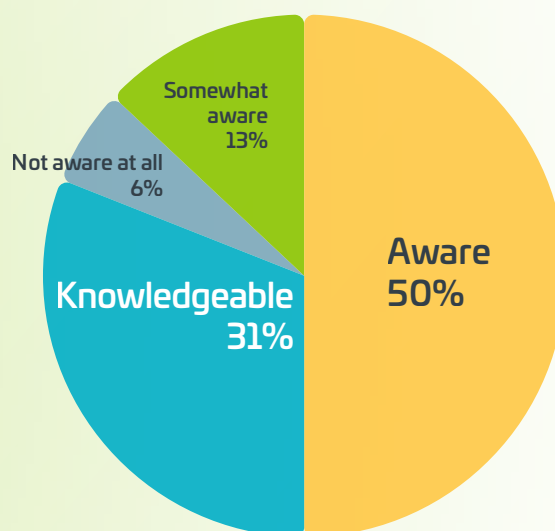
Detailed Analysis

The survey revealed a high level of awareness of MiCA's overall requirements among respondents, with 75% describing themselves as "Very Familiar," 13% as "Somewhat Familiar," and 13% as "Familiar."

How familiar are you with the Markets in Crypto-Assets (MiCA) regulation?



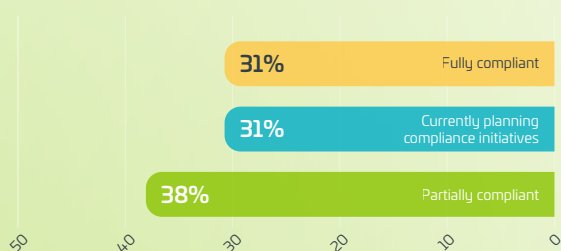
How aware are you of the sustainability-related requirements within MiCA?



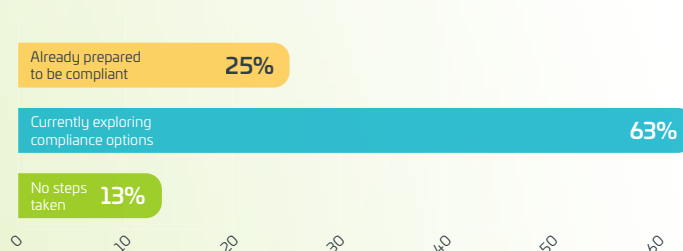
However, awareness of MiCA's sustainability requirements specifically was more varied. 31% of respondents indicated they were "Knowledgeable" on the topic, with 50% reporting being "Aware," 13% describing themselves as "Somewhat Aware," and 6% stating they were "Not Aware at All." This highlights a gap in awareness and understanding in a big portion of the respondents, underscoring the need for targeted educational initiatives to ensure all stakeholders are equipped to meet the regulation's demands. This is all the more so given that survey responses were drawn from the base of CASPs sufficiently interested to engage on the sustainability topic in the first place.

Compliance statuses varied significantly. While 31% of respondents reported being “Fully Compliant” with MiCA requirements, 38% indicated they were “Partially Compliant,” and 31% stated they were “Currently Planning Compliance Initiatives.”

Has your organisation taken any steps towards complying with MiCA regulations?



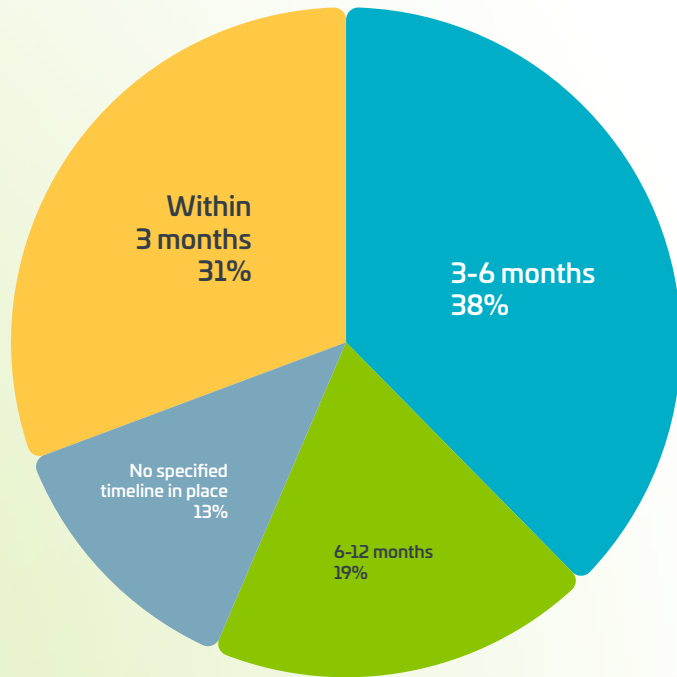
Has your organisation taken any steps to comply with the MiCA CASP sustainability disclosure requirement?



This was a markedly different landscape to that reported for MiCA CASP sustainability disclosure requirements specifically, where 25% of respondents reported they were “Already Prepared to Be Compliant,” 63% indicated they were “Currently Exploring Compliance Options,” and 13% stated they had “Not Taken Any Steps Yet.” The takeaway we highlight here is that organisations are likely to be at a far earlier planning stage with sustainability compliance requirements (63%) than they are with the MiCA requirements in aggregate (31%), likely driven by the differing assessments of risk (see also later discussion) associated with non-compliance for differing components of MiCA requirements.

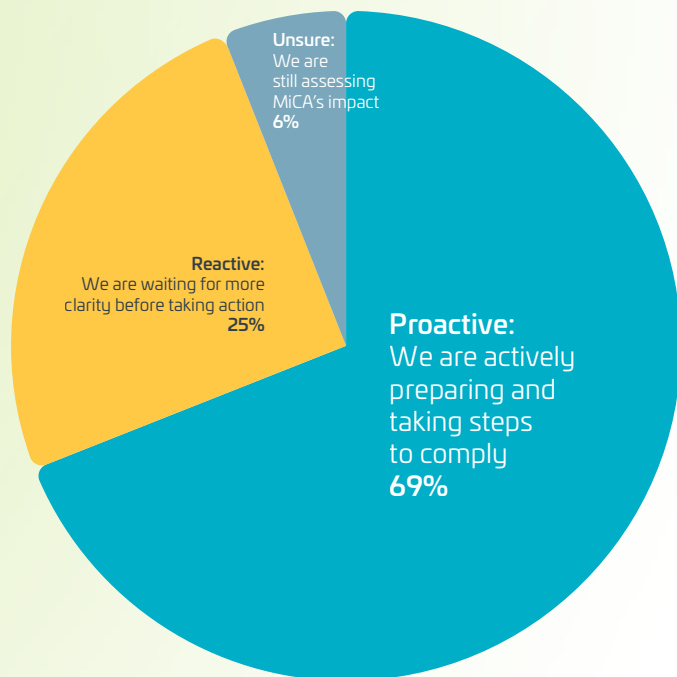
Returning to the aggregate picture, market participants suggested a willingness to comply, and comply quickly with MiCA requirements. More than two-thirds of organisations expected to achieve compliance within a 6-month time window, reflecting a clear focus on aligning with MiCA requirements in the near term. Specifically, 31% anticipated achieving compliance within 3 months, 38% expected to do so within 3 to 6 months, and 19% projected a timeline of 6 to 12 months. Only 13% did not have a specific timeline in place. These varied timelines highlight the differing stages of readiness and resource allocation across surveyed organisations. It is important to note that these responses were provided in December 2024.

What is your organisation's expected timeline for achieving full MiCA compliance?



In terms of strategic approach, a minority of respondents noted a reactive approach to MiCA and MiCA sustainability compliance, citing the need for greater regulatory clarity before committing significant resources. Respondents with a proactive approach emphasised the importance of early preparation to mitigate risks and capitalise on competitive advantages, and this is reflected in the majority of organisations currently at sustainability compliance planning stage, though not necessarily with defined solutions in place.

Which best describes your organisation's approach to MiCA, and specifically MiCA sustainability compliance?



Other sustainability measures being pursued by responding organisations included ESG policy development, energy efficiency improvements, and carbon footprint tracking. Many respondents highlighted the need for more robust tools and frameworks to address sustainability compliance requirements effectively. Concerns about interpreting and applying specific provisions were frequently raised, emphasising the importance of integrating compliance tools into operational workflows to ensure efficiency and effectiveness. Some respondents also noted the potential for industry collaboration to drive innovation and improve the scalability of sustainability solutions.



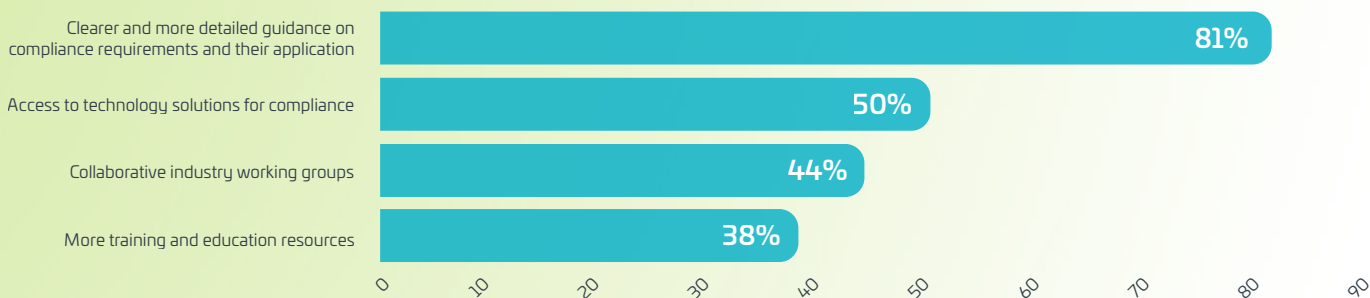
Kirsteen Harrison
Sustainability
Director
Zumo

“At Zumo, we’ve been an active voice for sustainability in the cryptoasset industry since the first days of the public conversation. Having the first mandated requirements through MiCA feels like a milestone moment in the evolution, and we continue to work very closely with industry and with regulators to make sure that we provide simple, effective solutions and that point of contact and liaison between industry and policy.”

Clearer and more detailed communication of regulatory guidance (81%) was identified by respondents as the most requested area of CASP support from regulators to enhance MiCA compliance in the area of sustainability requirements. Access to technology solutions for compliance (50%) and the establishment of collaborative working groups (44%) were also frequently suggested to foster innovation and develop scalable solutions. Additionally, more training and education resources (38%) were identified as crucial to bridge knowledge gaps and enhance industry readiness.

What type of support do you believe CASPs need from regulators to enhance MiCA compliance in the area of sustainability requirements?

Multiple choice



These challenges were further compounded by the noted absence of sustainability assessments from initial CASP application process at NCA level, which some respondents felt deprioritised sustainability compliance. Qualitative feedback from the survey highlighted that this exclusion was resulting in organisations allocating resources toward other compliance priorities.

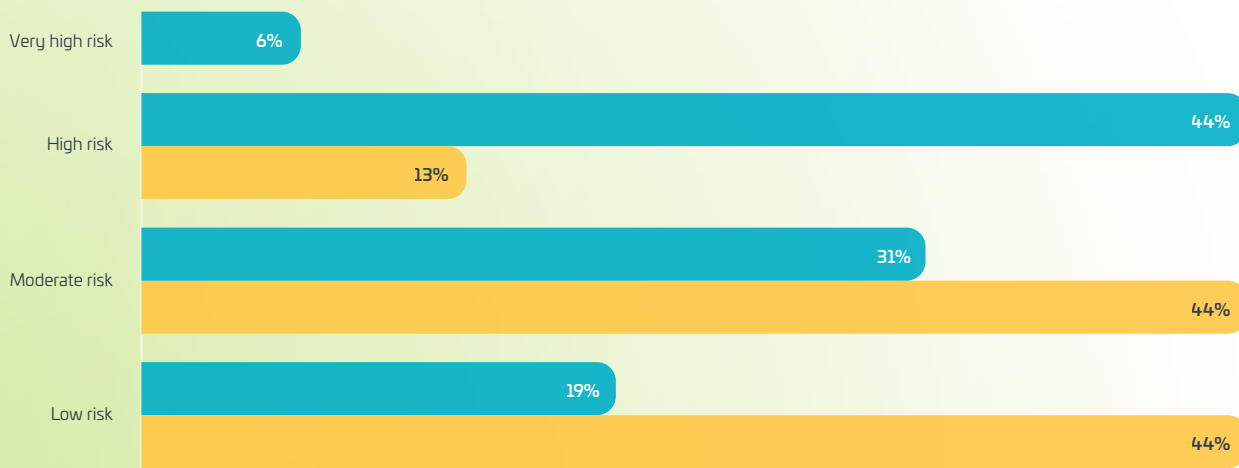
As a result, when comparing the perceived risks of non-compliance with MiCA’s overall requirements versus its sustainability-related requirements, a clear distinction emerges. For MiCA’s overall requirements, the majority of respondents identified non-compliance as “High Risk” (44%) or “Moderate Risk” (31%), with only a small percentage attributing “Very High Risk” (6%) or “Low Risk” (19%). In contrast, sustainability-related requirements were perceived as less risky for non-compliance, with “Moderate Risk” and “Low Risk” equally cited at 44%, and only 13% assessing a “High Risk.” This contrast suggests that while sustainability compliance is recognised as important, it is viewed as posing a comparatively lower immediate threat than overall MiCA compliance requirements.



How do you perceive the risk of non-compliance with MiCA's overall requirements?



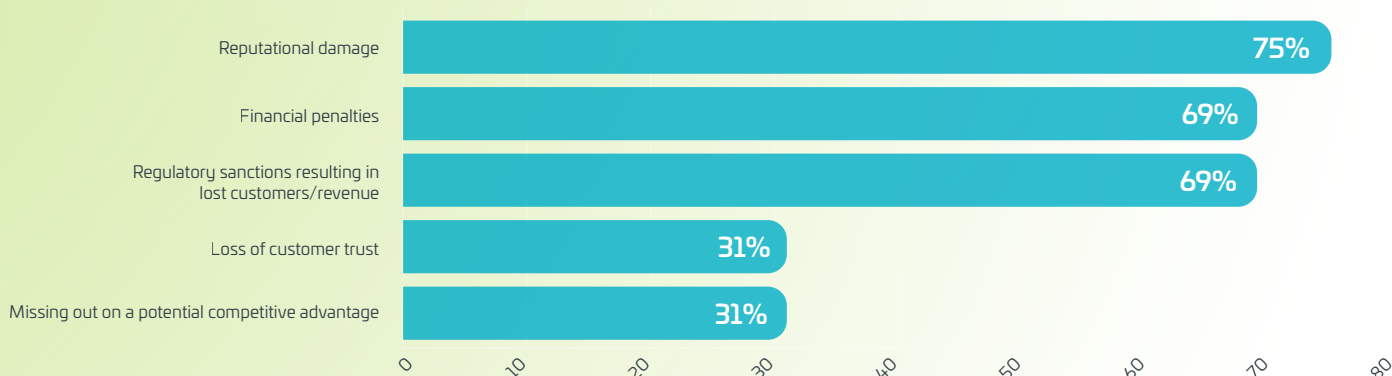
How do you perceive the risk of non-compliance with MiCA's sustainability-related requirements?



When it comes to perceptions of risk of non-compliance, reputational damage was identified as the most significant consequence of non-compliance by 75% of respondents. Financial penalties and regulatory sanctions, each cited by 69% of respondents, were also significant concerns, with potential customer loss being a key driver. Loss of customer trust was noted by 31% of respondents. Although sustainability-specific non-compliance was perceived as a lower risk, some respondents noted that failing to meet these requirements could result in competitive disadvantages.

What do you think are the main risks your organisation would face in the event of non-compliance?

Multiple choice

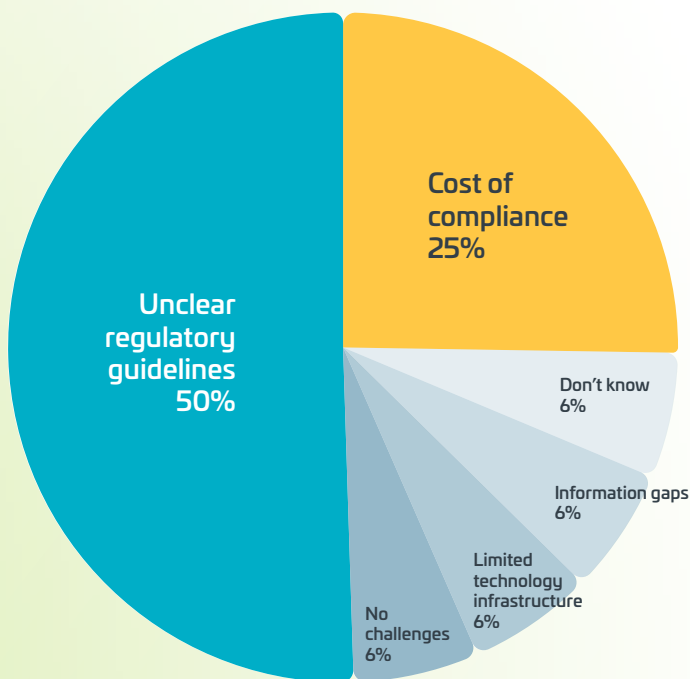


“They should not look at MiCA - be it the sustainability or other requirements - from a compliance perspective only. They should also and preferably look at it as an opportunity to access the EU-wide market”

Peter Kerstens, DG FISMA, European Commission

Across the MiCA piece, as with the CASP sustainability topic, an industry perception of unclear regulatory guidelines was the most significant challenge identified, with 50% of respondents pointing to inconsistencies in guidance and gaps in standardisation. 25% also highlighted the cost of compliance as a major barrier.

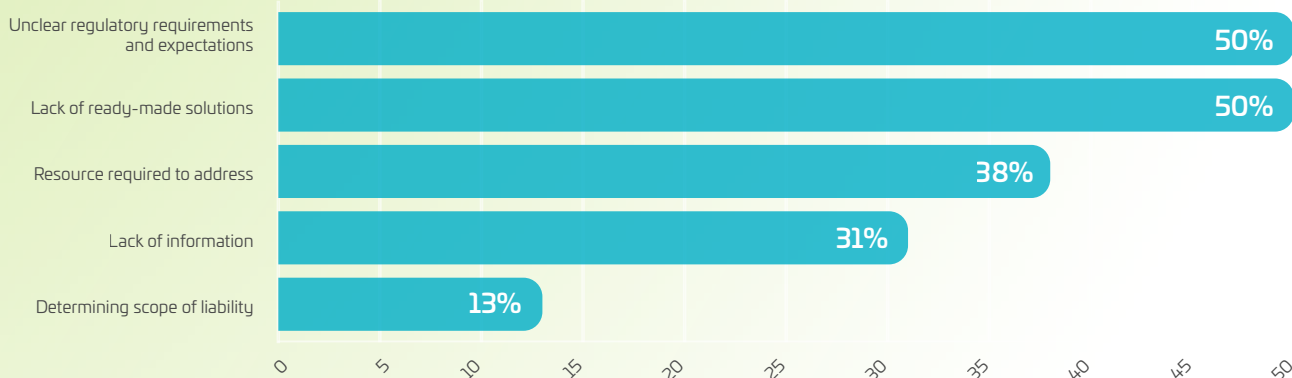
What do you consider the biggest challenge to achieving MiCA compliance for your organisation?



Related to CASP sustainability requirements specifically, a perceived lack of in-depth operational detail was a recurring theme, with respondents pointing to outstanding operational questions and inconsistent guidance across jurisdictions. Policymakers were urged to streamline compliance processes and provide harmonised guidelines to ensure effective and consistent practices across the EU. Particularly at NCA level, this will play a pivotal role in how effectively incoming sustainability requirements are assessed, implemented and enforced.

In summary, the key pain points identified in achieving MiCA sustainability compliance were access to ready-made technology solutions and unclear regulatory requirements and expectations (both cited by 50% of respondents), followed by the resource required to address (38%) and lack of available information (31%).

What are your key pain points in meeting MiCA sustainability compliance requirements?



Conclusion

While the snapshot of CASPs canvassed in this initiative demonstrated a strong understanding of MiCA's overarching requirements and a willingness to align with its mandates, their readiness to comply fully—especially with sustainability-related requirements—varies significantly. Most are in transitional phases of compliance, highlighting the need for communicated regulatory support, access to technology solutions, and continuing industry-regulator liaison to bridge gaps and achieve a more uniform state of preparedness.

The survey highlights both the opportunities and challenges in navigating MiCA compliance. While the regulation offers a framework to enhance transparency and sustainability disclosures in the cryptoasset sector, its practical implementation presents challenges. Key barriers include knowledge gaps, high overall compliance costs, and the lack of awareness of available solutions and how to access them. Despite these challenges, the industry demonstrates a willingness to adapt, as evidenced by the proactive measures being taken by many respondents.

Organisations must seize this transitional period as an opportunity to position themselves competitively. Proactive adoption of sustainability metrics, coupled with investments in compliance technology and expertise, will not only mitigate risks but also enhance resilience in a rapidly evolving regulatory landscape. As MiCA becomes a cornerstone for the cryptoasset industry, those who adapt early will be better equipped to thrive in a more transparent and accountable ecosystem.

Looking ahead

The path to MiCA compliance requires a collaborative effort between regulators, CASPs, and industry leaders. By addressing the highlighted gaps and prioritising sustainability as a core value, the cryptoasset sector can meet regulatory demands while driving innovation and fostering long-term growth.



Peter Kerstens
Adviser
DG FISMA, European Commission

Sustainability of crypto-assets and in particular their validation protocols are a key policy concern. This issue was much debated during the Mica negotiations, with some even wanting to go as far as prohibiting validation protocols that were deemed to be unsustainable. The European Commission was not in favour of this and ultimately there was no majority for a ban. But this does not take away that there are legitimate questions around for example the environmental and climate impact of (certain) crypto assets or blockchains. That is why Mica contains disclosure requirements, aiming at informing consumers and investors on the relative sustainability of crypto assets. It is not as simple as saying protocol x is good and protocol y is bad. You have to look at the energy consumption, the energy input, the source of the energy and whether it is renewable or not, whether it has climate or other adverse impacts. But you also have to look at the output in my view, for example can a value be placed on trust in a trustless environment, how many transactions can be validated for a given energy input, how does this compare to energy consumption of other technologies like card-based systems, etc. We do not want and we will not support any crypto-green washing, nor do we agree that crypto activity and blockchains are an environmental and climate disaster. Only by making fair and proper disclosures, based on solid methodology and (scientific) evidence, can consumers and investors take decisions based on their own sustainability preferences and priorities. We are all concerned about climate change and the environment at large. With the right information at hand, we can take the right decisions on what to engage with and what to avoid. I believe that ultimately the market will respond to this and will put those crypto assets that have better sustainability records ahead. Market-based approaches have shown to work much better than compulsion or prohibition. They require sound information for market participants to take responsible decisions. Casps should recognise this. They should not look at Mica - be it the sustainability or other requirements - from a compliance perspective only. They should also and preferably look at it as an opportunity to access the EU-wide market. When we proposed Mica in 2020, we wanted to onshore responsible crypto and blockchain activity in the EU, because of the enormous opportunities blockchain technology and crypto assets hold for our economy and society. It really is about opportunity, rather than compliance. Just complying with Mica is a losing proposition and does not set you apart. Any Casp must comply, so there is nothing special in that. And being largely compliant or almost compliant really is nothing to be proud of.

Moreover, MiCA sustainability disclosures are just one step in the path to making the industry sustainable.





Joachim Schwerin
Principal Economist
DG GROW, European Commission

MiCA is a prominent example of the pro-crypto approach the Commission has been taken for a long time, starting in 2016 with declaring that blockchain as a breakthrough technology will be a positive innovation priority for all EU policy fields in the decades to come. This opportunity driven approach forms the core of Mica, but this does not mean that legitimate societal concerns, including those on sustainability, need not be addressed in a meaningful way. “Meaningful” in my opinion means providing verified information and reliable signals to crypto markets without unduly constraining the choice of validation protocol. In fact, scoring better purely on sustainability does not make a protocol better than any other overall, as many other factors play a role, but it can be an additional information that helps better match the preferences of those that find this criterion relevant.

We have known for a long time that compliance in particular requires clarity of rules, well educated actors that understand the relevant provisions in detail and technical standards that facilitate such understanding and establish acceptable benchmarks. The report outlines all of this clearly, and it demonstrates that these are moving targets under Mica that call for collective action. This learning requires joint public-private interaction, e.g. through dialogue and in sandboxes, Q&A formats, “living” legal commentaries online and similar fora and platforms. Here, much work remains to be done, but an increasing number of market participants are actively exploring and implementing this. I welcome this profoundly.

Not to be forgotten is the cost aspect. Most Casps are SMEs and have limited resources to do technical tests and/or accumulate data. They must not be overburdened with non-essential requirements and undue costs of compliance, and they should be able to resort to efficient and cost-minimising solutions. We did not choose to actively support a space that minimises the roles of unproductive intermediaries only to have them creep back in by adding excessive requirements for sustainability standards. As such, taking compliance with Mica on sustainability requirements seriously is essential, and commitment by the industry is proof of this, but there must be a positive reward for such an attitude. This reward is to keep compliance requirements clear and simple and any cost associated with this at the absolute minimum, so as not to have the tail wag the dog but the crypto dog wag the bureaucracy tail.



Kirsteen Harrison
Sustainability Director
Zumo

Implementing MiCA’s sustainability provisions effectively means situating it in the industry context, relating it to the sustainability work that has been done to date, and drawing it into the wider ESG compliance landscape of which it forms a part.

At Zumo, we’ve been an active voice for sustainability in the cryptoasset industry since the first days of the public conversation. Having the first mandated requirements through MiCA feels like a milestone moment in the evolution, and we continue to work very closely with industry and with regulators to make sure that we provide simple, effective solutions and that point of contact and liaison between industry and policy.

As far as MiCA goes, we’ve been working extremely hard to close the knowledge gaps that exist on this still emerging topic. By fostering dialogue and championing actionable steps, we want to support the transition toward a transparent, sustainable, and compliant cryptoasset industry.

* Footnote: Values may not add to 100% due to rounding

Resources & contacts

The Ultimate MiCA Sustainability Disclosure Requirements Guide



Published in September 2024, the guide explains MiCAR’s sustainability disclosure requirements for crypto-asset service providers, covering who must comply, implementation timelines, energy-specific rules, white paper roles, transitional phase impacts, and tools/services for compliance.

[Download the report](#)

Podcast & video MiCA Sustainability series



MiCA compliance essentials: key requirements, deadlines & reporting. Feat. experts at Hogan Lovells

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MiCA sustainability Disclosures. Requirements for CASPs and deadlines

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MiCA Masters: Sustainability Requirements in MiCA Hosted by Delphine at Solidus Lab

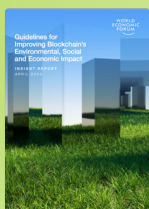
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MiCA sustainability disclosures What’s required? How to comply?

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Decarbonising Crypto: A state of play report
October 2021


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Appendix

List of survey questions asked

How familiar are you with the Markets in Crypto-Assets (MiCA) regulation?

How aware are you of the sustainability-related requirements within MiCA?

To what extent do you agree with the following statement: "Sustainability compliance is a priority for my organisation"?

Has your organisation taken any steps towards complying with MiCA regulations?

Has your organisation taken any steps to comply with the MiCA CASP sustainability disclosure requirement?

What is your organisation's expected timeline for achieving full MiCA compliance?

What do you consider the biggest challenge to achieving MiCA compliance for your organisation?

What are your key pain points in meeting MiCA sustainability compliance requirements?

How do you perceive the risk of non-compliance with MiCA's overall requirements?

How do you perceive the risk of non-compliance with MiCA's sustainability-related requirements?

What do you think are the main risks your organisation would face in the event of non-compliance?

Which best describes your organisation's approach to MiCA, and specifically MiCA sustainability compliance?

Has your organisation sought external support or consultation to assist you with your MiCA compliance?

Which sustainability actions has your organisation implemented, or is planning to implement?

What type of support do you believe CASPs need from regulators to enhance MiCA compliance in the area of sustainability requirements?

How would you rate the current support and guidance available from the European Securities and Markets Authority (ESMA) to help you in meeting MiCA sustainability requirements?

How would you rate the current support and guidance available from member state national competent authorities in assessing and supervising MiCA sustainability requirements?

To what extent do you agree with the following statement: "I am confident ESMA will ensure the uniform application, interpretation and enforcement/supervision of MiCA sustainability requirements across the EU."

Do you have any other comments you would like to make about CASP sustainability readiness under MiCA and how you expect this topic to develop?

Which department do you work in?

Which best describes your organisation's cryptoasset activities?

How many employees does your organisation have?

Where is your organisation primarily based?

In which EU member state are you currently registered/planning to seek MiCA authorisation?