過渡期及其於2026年7月1日屆滿

Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland and Germany),
Solicitor (England & Wales and Hong Kong)
Of Counsel, KGP Legal LLC
alexander.ressos@kgplegal.com.sg
www.ressos.com.sg

第143條規管過渡安排。於2024年12月30日前結束的發售無須白皮書。於該日前已獲准交易的加密資產，最遲須於2027年12月31日備有白皮書，而營銷規則則自2024年12月30日起適用。於2024年12月30日前根據國家法律合法營運的提供者，可繼續營運，直至根據第63條獲授權或被拒絕為止，但不得遲於2026年7月1日。成員國可縮短這十八個月的期限，而多個成員國確實這樣做：歐洲證券及市場管理局（ESMA）公布的名單顯示，各國的祖父條款過渡期由數個月至整個期限不等。[1]第143(6)條容許已根據國家法律獲授權的公司採用簡化授權程序。

截至2026年6月30日，祖父條款過渡期已在整個歐盟結束。公司如透過未取得加密資產服務提供者（CASP）授權的歐盟實體為歐盟客戶提供服務，即屬非法營運，而主管當局已表示會把該日期視為硬性截止日。對瑞士和新加坡集團而言，這改變了對歐盟交易對手的評估。楚格交易所在立陶宛的流動性提供者，或新加坡保管人在德國的次保管人，現在都必須持有CASP授權；而瑞士或新加坡公司本身根據其打擊洗錢及外判規則進行的盡職審查，必須查核ESMA的獲授權CASP登記冊。[2]

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

註釋

1. Regulation (EU) 2023/1114, Art. 143(1) to (3) and (6)。成員國須於2024年6月30日前，將任何縮短的期限通知歐盟委員會及ESMA。ESMA, "List of MiCA grandfathering periods (Art. 143(3))"，2024年12月。 ↩
2. ESMA根據第109條備存CASP及白皮書登記冊。該登記冊於2025年啟用，是查核交易對手的參考。 ↩

Disclaimer

This article is provided for general information only. It is based on publicly available sources as at its date of publication. These sources have not been independently verified against licences, regulatory registers or the records of the entities concerned. It is not legal, tax, financial or investment advice. Nor is it a recommendation to invest in, transact with or use the services of any entity mentioned. Law and regulation change frequently, so the content may be incomplete or outdated. To the fullest extent permitted by law, Dr Alexander Ressos and the publisher of SingaporeIQ exclude all liability for loss or damage arising from the use of or reliance on this article. Readers should obtain advice on their specific circumstances before acting or refraining from action.

Names and trademarks of the entities discussed belong to their owners and are used for identification only. Their mention implies no endorsement, affiliation or allegation of wrongdoing. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. Corrections and updates: contact@ressos.com.

© 2026 Dr Alexander Ressos. This article may be quoted with attribution to SingaporeIQ (SingaporeIQ.com). Reproduction in full and any commercial use require prior written consent. The Legal Terms at https://singaporeiq.com/legal-terms apply.

Author contact: Dr Alexander Ressos, TEP · contact@ressos.com