



Banc Ceannais na hÉireann  
Central Bank of Ireland

Eurosystem

# Crypto Asset Service Providers (“CASP”) Return Guidance Notes on Compilation

April 2026 (Final)

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## Introduction

1. The CASP Return is applicable to all Crypto Asset Service Providers authorised by the Central Bank of Ireland ('Central Bank') under Article 63 Markets in Crypto Assets Regulation (EU) 2023/1114, and transposed into national law by S.I. No. 607/2024 - European Union (Markets in Crypto-Assets) Regulations 2024 Article 4(1)(a)
2. The purpose of this document is to assist firms when completing the return template. It provides direction on how to complete the return and specifies definitions for fields contained therein.
3. The CASP Return is downloaded from the [website](#) and then submitted through the portal. Firms are required to submit the CASP Return quarterly to the Central Bank, i.e., within 6 weeks (42 calendar days) of a calendar quarter end; 31 March, 30 June, 30 September, 31 December. If the remittance day falls on a public holiday, or a Saturday or a Sunday, data must be submitted on the following working day.
4. The CASP Return should be submitted via the Central Bank Portal (please refer to the CASP Return Technical Specification document attached at Appendix 2). It must be signed off at executive level within the firm but it can be submitted by the firm's designated Portal users.
5. All currency amounts should be reported in EUROS. If FX rates are required, please use the ECB closing rate as at the reporting date.
6. All values should be whole numbers (i.e. do not include decimal places).
7. Deduction values (where applicable) should be populated as positive figures only.
8. This document may be updated periodically, and the most up-to-date version will be available on the Central Bank's website.
9. If firms have any queries in relation to the CASP Return, or the content of this guidance note, they should contact their usual supervisor.

## Section 1 – Cover (tab 1)

10. **Institution Number:** populate the firm's Central Bank supervisory institution code **digits only**. Also, disregard the leading '00's (if any) e.g. CBI0050001 would be 50001.

## Section 2 – Return Validations (tab 2)

11. As set out therein, the return contains a number of in-built validations. In order to successfully submit the return **each rule** must have a validity status of **'true'**.

## Section 3 – General Information (tab CSR\_01.00)

12. **Market memberships** are the number of trading venues as defined under MiCAR that the firm is a member of as at the reporting period end. This metric may not apply to your firm. If this is the case, then include zero as the value for the metric.
13. **Number of Transactions** are the total number of transactions executed by the firm (which relates to the service of execution of crypto-assets for funds, execution of crypto-assets for other crypto-assets and exchange of crypto assets) or number of transactions executed on the trading venue(s) operated by the firm, where appropriate, during the entire quarterly reporting period (cumulative 3 month figure).
14. **Dealing on own account** refers to a firm carrying out the CASP services of “exchange of crypto-assets for funds”, as defined under Article 3(1) (19) of MiCAR and “exchange of crypto-assets for other crypto-assets” as defined under Article 3(1) (20) of MiCAR.
15. **Trading book size** refers to value of transactions.
16. **Crypto assets under Management** are the total of all crypto assets that are subject to portfolio management arrangements.
17. **Total number of crypto assets** is the total number of crypto assets listed and/or available (as part of exchange and execution services). This metric may not apply to your firm. If this is the case, then include zero as the value
18. **Number of members** are the number of market members at the reporting period end. This metric only applies to firms operating as a trading platform-and may not apply to your firm. If this is the case, then include zero as the value for the metric..
19. **Turnover from unregulated activity** is the total value of any regular turnover derived from activities other than regulated crypto asset business during the entire quarterly reporting period (cumulative 3 month figure). This metric may not apply to your firm. If this is the case, then include zero as the value for the metric.
20. **Passporting** is the number of EU/EEA jurisdictions into which the crypto asset service provider has permission to provide services on a cross border basis.

21. **Number of clients** is the number of clients for whom the firm provides regulated services (regulated by the Central Bank) and with whom they expect to do business with again in the future. This may include clients for whom the firm has not done business with in the past 12 months but whom the firm still regards as active.
22. **Retail client** means any natural person who is acting for purposes which are outside that person's trade, business, craft or profession<sup>1</sup>.
23. **Retail clients** are the number of retail clients for whom the firm provides regulated services (regulated by the Central Bank) and with whom they expect to do business with again in the future. This may include clients for whom the firm has not done business with in the past 12 months but whom the firm still regards as active.
24. **Active retail clients** are the total number of retail clients for whom the firm provide regulated services (regulated by the Central Bank) and with whom they have done business **within the last twelve months**.
25. **Institutional clients** are the number of non-retail clients for whom the firm provides regulated services (regulated by the Central Bank) and with whom they expect to do business with again in the future. This may include clients for whom the firm has not done business with in the past 12 months but whom the firm still regards as active.
26. **Active Institutional clients** are the total number of institutional clients for whom the firm provides regulated services (regulated by the Central Bank) and with whom they have done business **within the last twelve months**.

## Section 4 – Income Statement (tab CSR\_02.00)

27. **Interest Income** – to detail interest income from sources including but not limited to, bank deposits - clients' fund, interest income from loans and advances granted to group entities and interest income from loans and advances granted to third-party entities.
28. Income from provision of crypto services - **of which Income from Other Crypto Services** – to detail interest income that is derived from non-MiCAR activities, such as Staking.

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<sup>1</sup> Regulation (EU) 2023/1114 on markets in crypto assets ('MiCAR'), Article 3.1 (37).

## Off Balance Sheet Items (tab CSR\_04:00)

29. This section sets out off-balance sheet exposures that may impact the firm's financial position and prudential requirements under MiCAR. Off-balance sheet items should be reported in accordance with applicable accounting standards and MiCAR requirements. The most significant off-balance sheet items for CASPs are typically client crypto-assets and client funds held under custody and safeguarding arrangements (MiCAR Article 70) not to account for custodial assets.
30. Other off-balance sheet items may include contingent liabilities, guarantees, commitments, operating leases, and derivative positions, reported in accordance with IFRS/national GAAP.

## Section 5 – Own Funds

31. MICAR sets out the characteristics and conditions for own funds.

### Section 5.1 – Own Funds Composition (tab CSR\_05.00)

32. The own funds shall consist of the Common Equity Tier 1 items and instruments referred to in Articles 26 to 30 of Regulation (EU) No 575/2013 after the deductions in full pursuant to Article 36 of that Regulation, without the application of the threshold exemptions referred to in Article 46(4) and Article 48 of that Regulation (ref: MICAR, Art 35(2))

### Section 5.2 – Own Funds Requirement (tab CSR 06.00)

33. Please refer to MICAR, Article 35 in relation to legislative requirements vis-à-vis amount of own funds.

## Section 6 – Fixed Overhead Calculation (tab CSR\_07.00)

34. Please refer to prudential requirements referenced in MICAR, Art 67.
35. Projected fixed overheads of the current year Article 3 of [Draft RTS on mandate of Article 13(4)]  
The projection of the fixed overheads for the current year after the distribution of profits.
36. Variation of fixed overheads (%) The amount shall be reported as the absolute value of:  $16 \frac{[(\text{Projected fixed overheads of the current year}) - (\text{Annual fixed overheads of the previous year})]}{(\text{Annual fixed overheads of the previous year})}$

## Section 7 – Client Assets

### Section 7.1 – Client Assets General (tab CSR\_08.00)

37. This tab is required to be completed by all submitters.
38. With regards to rows 30, 120–140 and 220-230 a response is only required where the firm is providing the service of custody and administration of crypto assets on behalf of clients.
39. With regards to rows 040 and 150-170, a response is only required where the Firm (temporarily) held client crypto assets on the reporting date but is **not** providing the service of custody and administration of crypto assets on behalf of clients.

### Section 7.2 – Client funds (tab CSR\_08.01)

40. This table should be completed if the Firm provides a response to row 020 of the 'CSR\_08.00' tab (i.e. of the Firm held client funds (fiat) on behalf of clients).

### Section 7.3 – Custodians (tab CSR\_08.02)

41. This table should only be completed if the response to row 220 in the 'CSR\_08.00' tab referenced above is 'Y'.

### Section 7.4– Outsourcing (tab CSR\_08.03)

42. This table should only be completed if the response to row 240 in the 'CSR\_08.00' tab referenced above is 'Y'.

### Section 7.5– Jurisdiction (tab CSR\_08.04)

43. This table should be completed if the Firm provides a response to row 010 of the 'CSR\_08.00' tab (i.e. if the Firm held client assets (client funds, client-crypto-assets) on behalf of a client).

### Section 7.6 – Custody wallets (tab CSR\_08.05)

44. This table should be completed if the Firm provides a response to row 030 of the 'CSR\_08.00' tab (i.e. if the Firm held client crypto-assets as part of a custody service)

## Appendix 1- CASP Return

[CSR 1.2 Reporting Template.xlsx](#)

**Appendix 2 - CASP Return Technical Specification**



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# Crypto Asset Service Providers ('CASP') Return Operational & Technical Arrangements for making a submission

December 2025

## Crypto Asset Service Providers ('CASP') authorised by the Central Bank of Ireland ('Central Bank') under Markets in Crypto Assets Regulation (EU) 2023/1114, (MiCAR), Title V.

### Operational and Technical Arrangements Central Bank of Ireland

This document sets out the operational and technical arrangements ('technical arrangements') for submitting the **CASP Return** to the Central Bank.

#### 1.0 **Introduction**

Returns must be submitted to the Central Bank via the Central Bank Portal ('Portal') and can only be submitted by authorised users<sup>2</sup> within reporting entities.

**Please note this is a three-step process:**

- i. Log into the Portal and select Returns;
- ii. Load the file; and
- iii. Once the return has been uploaded, you must then (a) **Finalise** and (b) **Sign Off** the return in the Portal to fully submit to the Central Bank

**Note:** the submission of the CASP Return is a **two person sign off** process. The form must be Signed Off, as uploading the file alone does not constitute a submitted return.

#### 2.0 **Pre-requisite actions before submitting a CASP return**

##### 2.1 **Portal Permissions**

The person submitting the CASP Return via the Portal must request access to the return from their institution's Portal administrator - any authorised Portal user can be granted this access. Alternatively, the Portal administrator may submit the return.

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<sup>2</sup> Please refer to the [CBI Portal webpage](#).

## 2.2 CASP Return template

Download the CASP Return template (excel format) from the Central Bank's website.

Populate the required fields within the form as detailed in the '*Crypto Asset Service Providers ('CASP') Return - Guidance Notes on Compilation*'.

The CASP Return can only be successfully uploaded in the Portal if all the validations in the completed template are 'Valid' in the 'Cover' tab thereof.

## 3.0 File Naming Convention

The naming convention to be used when submitting files is

CXXXXXX\_YYYYMMDD\_CSR

where:

- CXXXXXX – is the institution code the submitting entity uses to log in to the Portal.
- YYYYMMDD – is the return reporting date.
- CSR – is the return code.

Example: a firm with an institution code of C50001 and a reporting date of 31/12/25 will name the file C50001\_20251231\_CSR.

## 4.0 Uploading the CASP Return to the Returns Section of the Portal

### 4.1 Log into the Portal

**Initial Multi-Factor Authorisation (MFA) setup**

New users, please follow the below instructions to set up MFA.

**Step 1:** Select the link from the Duo Security Enrolment email to create your Duo account

**Step 2:** Follow the enrolment steps and select a second factor authentication method

**Step 3:** Enter your Person code and Password  
Select 'Sign In'  
You will then be asked to authenticate yourself via  
DUO mobile or Phone call

**Authentication via Duo Mobile App**

- 1 Select I have a tablet if you are using a device
- 2 Download Duo Mobile App onto your tablet or phone. Select Next
- 3 Open the Duo Mobile App and add your account by scanning QR code that appears
- 4 Select Continue once you receive confirmation that Duo Mobile was added

**Enter your phone number**  
You'll have the option to log in with Duo Mobile.  
Country code Phone number  
Example: "85 012 3456"  
Continue  
I have a tablet

**Download Duo Mobile**  
On your mobile device, download the app from the App Store or Google Play.  
Next

**Scan this code in Duo Mobile**  
In the app, select Use QR code to scan.  
Get an activation link instead

**Added Duo Mobile**  
You can now use Duo mobile to log in using a push notification sent to your mobile device.  
Continue

Enter your person code and password  
cibi-unity.local/CB0208990  
Sign in  
Forgot Your Password? Help

New User? Register  
Authenticating by Phone? Guidance

Existing users please refer to your Duo MFA link previously provided via email. If you have not received this link or have any issues accessing the link please contact onlinereturns@centralbank.ie

Legal Information

Enter your Person Code and Password which will be generated when you register for the Portal.

#### 4.1.1 Select the Returns tab:

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Home  
Institution Details  
My Institution Profile  
Pending Actions  
Fitness and Probity  
Messages  
Request Change  
Portal Administration  
Returns  
Help

Home

My Pending Actions

Action Id	Type	Status	Created On	Due Date
There are no open pending actions to display.				

View More

Institution's Portal Administrator(s)

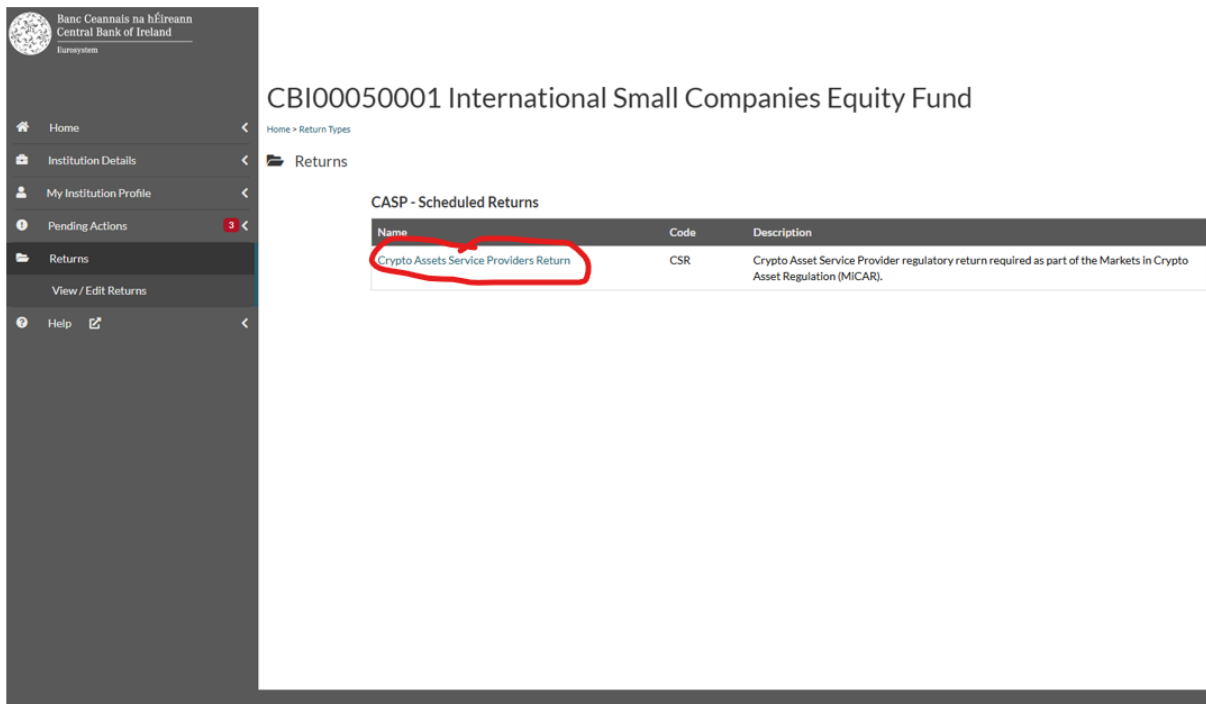
Contact your Portal Administrator for questions on portal functionality, including your permissions

Recent Messages

From	To	Subject	Sent On
No results			

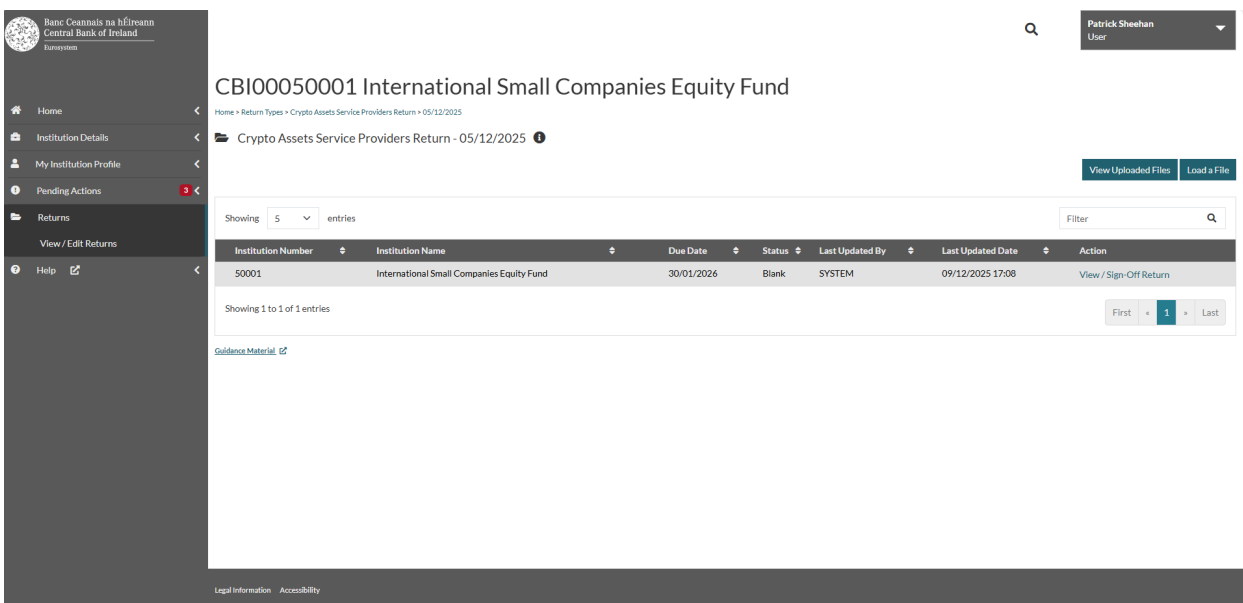
View More

#### 4.1.2 The CASP Return will display as the 'Crypto Assets Service Providers Return' under 'CASP – Scheduled Returns' category.



## 4.2 Upload the Return to the Portal

From the following screen select the Load a File option to commence the upload of a CASP Return to the Portal



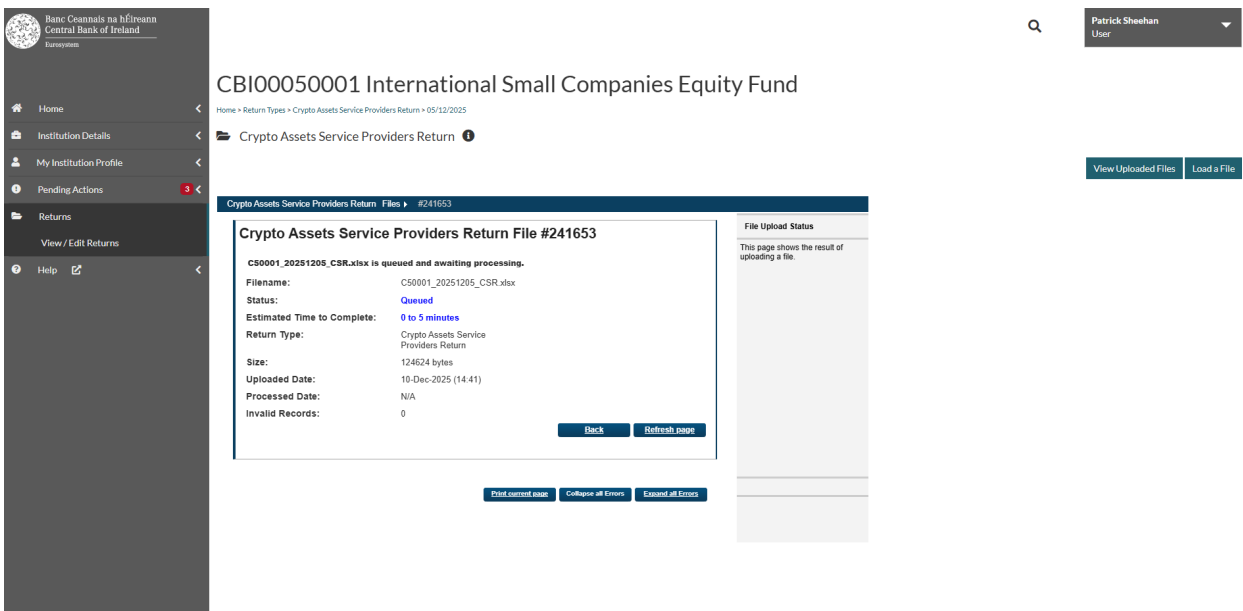


When the completed CASP Return has been selected, click the 'Load File' button.

4.2.1 The Portal will run validation checks to ensure that the CASP Return has completed and that all the values on the cover tab are showing valid.

As per section 2.2 above, if any of the fields in the 'Cover' tab show as 'Invalid' then the Portal will reject the upload of the CASP Return at this stage. Thus, please ensure that all fields in the 'Cover' tab as 'Valid' before starting the upload process in the Portal.

4.2.2 If a valid CASP Return is uploaded the Portal will indicate that it is has accepted the return (see screen shot below)



Home ▶ Data ▶ Virtual Asset Services Provider Returns(VSP) Files ▶ #206016

**File Upload Status**

This page shows the result of uploading a file.

Validation didn't find any errors so the file has been 'accepted' and all its data has been loaded.

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### Virtual Asset Services Provider Returns(VSP) File #206016

<b>Filename:</b>	C767_20210101_VSP.xlsx
<b>Status:</b>	<b>Accepted</b>
<b>Return Type:</b>	Virtual Asset Services Provider Returns(VSP)
<b>Size:</b>	486433 bytes
<b>Uploaded Date:</b>	21-Apr-2021 (11:02)
<b>Processed Date:</b>	21-Apr-2021 (11:02)
<b>Invalid Records:</b>	0

Back
Refresh page

Print current page
Collapse all Errors
Expand all Errors

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## 4.3 Finalise the CASP Return

4.3.1 To finalise the CASP Return select View / Signoff Returns for the return as shown below:

Home ▶ Data ▶ Virtual Asset Services Provider Returns(VSP)

**Return Type Options**

This page displays the options for the 'Virtual Asset Services Provider Returns(VSP)' return for your institution.

You can signoff data or view previously loaded data by clicking on the 'View / Signoff Returns' button.

You can view a history of all the files uploaded (whether 'accepted' or 'rejected') by clicking on the 'View Uploaded Files' button.

You can load a new file by clicking on the 'Load a File' button.

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### Virtual Asset Services Provider Returns(VSP)

**View / Signoff Returns**

Signoff or View data that was previously entered

**View Uploaded Files**

View the files that were previously uploaded for this return

**Load a File**

Load a data file for this return

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4.3.2 The following screens will open allowing you to 'Finalise' the CASP Return. This is the second stage of the upload process of the return.

Home > Data > Virtual Asset Services Provider Returns(VSP) Returns

Returns

**VSP - Virtual Asset Services Provider.**

This page shows all the 'Virtual Asset Services Provider Returns(VSP)' returns entered by your institution.

There are outstanding returns which need to be completed and submitted to the Central Bank .

Reporting Date	Status	Submission Due Date	Last Updated By	Last Updated
<a href="#">01-Jan-2021</a>	Valid	30-Apr-2021	(Central Bank)	21-Apr-2021 (11:19)

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4.3.3 Select the relevant return by clicking on the Reporting Date and the following screen will open

Home > Data > Virtual Asset Services Provider Returns(VSP) Returns > 01-Jan-2021

Sections

**Virtual Asset Services Provider Returns(VSP) , 01-Jan-2021 - Sections**

The 'Virtual Asset Services Provider Returns(VSP)' return is divided into sections.

Complete each section that applies to your institution and submit the return to the Central Bank .

Section	Status	Required	Last Updated By	Last Updated
<a href="#">VSP</a>	Valid	Mandatory	(Central Bank)	21-Apr-2021 (11:19)

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4.3.4 Select the 'Finalise' icon which will complete the second step in the form upload process.

#### 4.3.5 When the return has been Finalised the following screen will prompt that for the CASP Return to be fully submitted to the Central Bank it must be 'Signed Off'

Home ▶ Data ▶ Virtual Asset Services Provider Returns(VSP) Returns ▶ 01-Jan-2021 ▶ Finalise Return

**Finalise Return Instance**

**Virtual Asset Services Provider Returns(VSP), 01-Jan-2021 has been finalised**

This page shows the results of Finalising a Return. The return will only be finalised if it has passed all cross form rule checks.

This Return is 'Finalised' - it must now be 'Signed-Off' to be submitted to the Central Bank. Use the back button to navigate to the previous page.

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#### 5.0 Sign Off the CASP Return

As per section 2.2 above, for the CASP Return to be signed off and submitted to the Central Bank it requires a two person sign off. The person who completed the first two steps and brought the return to the Finalise stage cannot sign off the return. Thus, a second person is required to complete this step.

#### 5.1 To Sign Off the CASP Return, select View / Signoff Returns for the CASP Return as shown below:

Home ▶ Data ▶ Virtual Asset Services Provider Returns(VSP)

**Return Type Options**

Virtual Asset Services Provider Returns(VSP)  
Signoff or View data that was previously entered

This page displays the options for the 'Virtual Asset Services Provider Returns(VSP)' return for your institution.

You can signoff data or view previously loaded data by clicking on the 'View / Signoff Returns' button.

You can view a history of all the files uploaded (whether 'accepted' or 'rejected') by clicking on the 'View Uploaded Files' button.

You can load a new file by clicking on the 'Load a File' button.

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**View / Signoff Returns**  
Signoff or View data that was previously entered

**View Uploaded Files**  
View the files that were previously uploaded for this return

**Load a File**  
Load a data file for this return

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5.2 Select the CASP Return that has been uploaded by your firm from the following screen.

Home ▶ Data ▶ Virtual Asset Services Provider Returns(VSP) Returns

**Returns**

VSP - Virtual Asset Services Provider.

This page shows all the 'Virtual Asset Services Provider Returns(VSP)' returns entered by your institution.

There are outstanding returns which need to be completed and submitted to the Central Bank .

Reporting Date	Status	Submission Due Date	Last Updated By	Last Updated	
01-Jan-2021	Finalised	30-Apr-2021	Brian McNeilly	21-Apr-2021 (16:45)	

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Select the return by clicking on the Reporting Date and the following screen will open

Home ▶ Data ▶ Virtual Asset Services Provider Returns(VSP) Returns ▶ 01-Jan-2021

### Virtual Asset Services Provider Returns(VSP) , 01-Jan-2021 - Sections

Section	Status	Required	Last Updated By	Last Update*
VSP	Valid	Mandatory	(Central Bank)	21-Apr-2021

If the Return is complete, it must be 'submitted' to the Central Bank.

[Sign-Off](#)

The 'Virtual Asset Services Provider Returns(VSP)' return is divided into sections.

Complete each section that applies to your institution and submit the return to the Central Bank.

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5.4 This is the final step in uploading the CASP Notification to the Portal.

Home ▶ Data ▶ Virtual Asset Services Provider Returns(VSP) Returns ▶ 01-Jan-2021 ▶ SignOff Return

### Sign-Off Return

**The Return is ready to be signed-off.**

The Virtual Asset Services Provider Returns(VSP) return for 01-Jan-2021 must be 'signed-off' to complete the process of submitting data to the Central Bank

This return is due to be submitted by 30-Apr-2021.

*After you sign-off the return, it will be 'locked' and you will no longer be able to make changes (unless the return is subsequently unlocked by the Central Bank for revision).*

**Declaration**

To signify your acceptance of this statement, tick the box below:

Once you have verified the correctness of the data to your satisfaction, click the 'Sign-Off Return' button below to sign-off the return and submit the data to the Central Bank. This will complete the process of submitting the return (for this period).

I declare that the information which has been entered for the Virtual Asset Services Provider Returns(VSP) return for 01-Jan-2021 is complete and correct to the best of my knowledge.

[Cancel](#) [Sign-off Return](#)

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The firm is requested to declare that the information which has been entered for the CASP Return is complete and correct to the best of the firm's knowledge. Once you are happy with the accuracy and correctness of the data click the Sign Off Return button.

The CASP Return is now successfully submitted through to the Central Bank.

Home ▶ Data ▶ Virtual Asset Services Provider Returns(VSP) Returns ▶ 01-Jan-2021 ▶ SignOff Return

Sign Off Return Instance

### Sign-Off Return

**The return has been successfully signed-off**

You have successfully 'signed-off' the Virtual Asset Services Provider Returns(VSP) return for 01-Jan-2021 – it has now been submitted to the Central Bank.

This return was successfully submitted by the 30-Apr-2021 deadline.

*This Return is 'locked', and can't be changed until it is unlocked for revision by the Central Bank .*

Use the back button to navigate to the previous page.

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The Portal will automatically send an email confirming the successful upload of the Firm's CASP return.

## 6.0 Other

Please note that these operational and technical specifications may be updated from time to time.

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