

The Distributed Ledger

Blockchain, Digital Assets and Smart Contracts

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Crypto Admissions, Disclosures and Market Abuse Regime: Key Proposals From the FCA's Consultation Paper

Executive Summary

- **What's new:** The UK Financial Conduct Authority has published a consultation paper setting out proposed rules for cryptoasset admissions to trading, disclosure requirements and a new framework to tackle market abuse in cryptoasset markets.
- **Why it matters:** These proposals are relevant to firms that expect to operate as qualifying cryptoasset trading platforms or intermediaries, or that are involved in the issuance and offering of qualifying cryptoassets, including those already operating under the EU's MiCA regime.
- **What to do next:** Firms should consider the practical implications of the proposed regime, including admission criteria, due diligence processes, market abuse systems and controls, and governance frameworks for inside information disclosure, and continue to monitor the development of the new rules before they are introduced later this year.

As part of the ongoing consultations in the UK on a new regulatory framework for cryptoassets, the UK Financial Conduct Authority (FCA) has published [Consultation Paper CP25/41 \(Consultation Paper\)](#). The Consultation Paper sets out the proposed rules for (1) how cryptoassets are admitted to trading on UK trading platforms and the information that must be disclosed to investors, and (2) a new framework to tackle market abuse, such as insider dealing and market manipulation, in cryptoasset markets.

These proposals, published in December 2025, form part of a broader effort by the UK government and the FCA to bring cryptoassets within the FCA's regulatory remit. The Financial Services and Markets Act 2000 (Cryptoassets) Regulations 2026 (Cryptoasset Regulations), expected to come into force on 25 October 2027, will provide the legislative foundation, and the FCA's proposed rules will sit on top of that framework.

This article summarises the FCA's key proposals from the Consultation Paper.

1. Admissions & Disclosures

The Admissions & Disclosures regime is designed to improve the quality and accessibility of information available to market participants, and to strengthen the admission processes of UK qualifying cryptoasset trading platforms (CATPs). The regime will apply to the admission to trading of qualifying cryptoassets on CATPs that allow retail participation, and to public offers to retail investors. The key proposals are outlined below.

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Admission Criteria and Due Diligence

- **CATPs must establish admission criteria.** CATPs will be required to develop risk-based and objective criteria for assessing whether admitting a particular cryptoasset to trading is likely to be detrimental to the interests of retail investors. Such criteria should take into account the non-exhaustive factors listed in the Cryptoasset sourcebook, which include the fitness and propriety of the person who created the cryptoasset and any person seeking its admission to trading; the quality of any qualifying cryptoasset disclosure document (QCDD) produced in connection with the proposed admission; the resilience, technical functionality and credibility of the governance and operational arrangements for the cryptoasset; and any known risks associated with the underlying technology. If CATPs conclude, based on their criteria and due diligence, that the cryptoasset is likely to be detrimental to retail investors, they must reject the application.
- **Criteria must be published.** CATPs' admission criteria will need to be approved by their governing body, published on their websites, and periodically reviewed and updated.
- **CATPs must conduct due diligence.** Before admitting a cryptoasset, platforms will be required to carry out appropriate due diligence. This will include verifying the identity of the key persons associated with the offer and admission (for example, through anti-money laundering processes, public records or independent sources); assessing the claimed utility, rights, governance functions or technical features of a cryptoasset; and assessing whether required disclosures have been made.
- **Recordkeeping requirements.** CATPs must keep appropriate records, including of their due diligence processes and the rationale behind admission or rejection decisions, for at least five years (or seven years if the FCA requests it).

Qualifying Cryptoasset Disclosure Documents

- **A QCDD is required before admission.** CATPs may only admit a cryptoasset to trading where a disclosure document (QCDD) has been prepared and published. The QCDD must contain "material information" necessary for a person considering buying the cryptoasset to make an informed assessment of its features.
- **Exceptions to the QCDD requirement.** A new QCDD will not be required where the cryptoasset is fungible with one already admitted to trading on the same CATP under an existing QCDD; where the cryptoasset is a UK-issued qualifying stablecoin (which will be subject to a separate regime); or where only qualified investors will be able to trade in the cryptoasset.

- **Content requirements to be outcomes-based.** The FCA is proposing high-level, outcomes-based rules and guidance for what CATPs should require in QCDDs. CATPs will have flexibility to tailor their disclosure rules to different asset types, provided the minimum requirements are met. Expected disclosures include governance mechanisms and characteristics, operational and cyber resilience, underlying technology and protocols, ownership and trading performance and history.
- **A summary of key information must be included.** Each QCDD must contain a short summary of no longer than two pages and written in plain English, presenting the key features and risks of the cryptoasset. The purpose of this summary would be to provide a clear and concise overview of the key information to promote consumer understanding of the technical details in the QCDD.
- **QCDDs must be published and filed with a centralised repository.** CATPs will be required to file approved QCDDs with an FCA-owned centralised repository (such as the National Storage Mechanism) before trading begins, and to publish them on their own websites. CATPs must also maintain a public list of QCDDs for all cryptoassets currently admitted to trading on their platform.
- **Supplementary disclosure documents (SDDs).** If a significant new factor, material mistake or material inaccuracy relating to the information included in a QCDD arises after a QCDD is published but before the cryptoasset is admitted to trading, the CATP must require the publication of a supplementary disclosure document (SDD). Where an SDD is published for an offer, individuals who have already agreed to buy or subscribe will have a right to withdraw in certain circumstances.
- **Responsibility for QCDDs.** The FCA's proposed rules specify who is responsible for QCDDs in different scenarios. Generally, this will be the person seeking admission, or the CATP itself where it admits a cryptoasset on its own behalf and prepares a QCDD (for example, where there is no identifiable issuer). This ensures there is always an identifiable party responsible for the accuracy and completeness of disclosure documents, who will be clearly and prominently identified in the QCDD.
- **Protected forward-looking statements.** Subject to meeting specified criteria, persons responsible for QCDDs will have the option to include protected forward-looking statements (PFLS), such as projections, forecasts or statements of intention. These statements will benefit from a modified liability standard (based on recklessness or dishonesty), which is intended to encourage the voluntary disclosure of useful forward-looking information.

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Firms operating under the EU's Markets in Crypto-Assets Regulation (MiCA) will want to consider how the FCA's proposed regime for QCDDs compares with the EU's requirements for cryptoasset white papers. There are a number of similarities: Both regimes require the preparation of a disclosure document before a cryptoasset can be admitted to trading, and a number of content requirements are overlapping. Both regimes also impose liability on the person responsible for the disclosure document where it contains untrue or misleading information, and neither regime provides for formal regulatory approval of the disclosure document before it takes effect. In addition, under both regimes the obligation to prepare the disclosure document may fall on a person other than the issuer. The FCA's cost-benefit analysis assumes that firms with MiCA white papers will be able to use much of the same information when preparing QCDDs.

There are, however, notable differences. For example, MiCA requires the use of a prescribed template form of white paper with mandatory fields. The FCA's proposed regime, by contrast, adopts an outcomes-based approach, setting high-level disclosure requirements and allowing CATPs flexibility to tailor their own disclosure rules. The FCA's proposals also envisage a more active gatekeeping role for CATPs. These differences may have practical implications for firms seeking to use disclosure documents prepared under one regime as the basis for compliance with the other. However, CATPs will have discretion to align their own rules with other jurisdictions' requirements, provided they still meet the requirements of the FCA's rules and the Cryptoasset Regulations. This flexibility will help ensure the FCA's rules remain proportionate.

Consumer Duty

- **Bespoke Admissions & Disclosures rules and guidance.**

The FCA proposes to disapply the Consumer Duty for activities relating to public offers and admissions to trading of qualifying cryptoassets. Instead, bespoke Admissions & Disclosures rules will embed consumer understanding provisions drawn from the Consumer Duty. For example, QCDDs will be required to meet the information needs of consumers, be likely to be understood by them, and communicate information in a way that is clear, fair and not misleading.

Stablecoins

- **Separate disclosure regime for UK-issued qualifying stablecoins.** Qualifying stablecoins issued by UK-authorized firms are proposed to be subject to separate, tailored Admissions & Disclosure requirements. Such issuers will need to produce both website disclosures and a stablecoin-specific QCDD, covering information on the stablecoin, including its backing asset pool, underlying technology, redemption policy and risks.

- **Other qualifying stablecoins.** In contrast, other qualifying stablecoins (such as those issued overseas or otherwise outside of the regulated activity) would be subject to the same Admissions & Disclosures requirements as other qualifying cryptoassets, including the requirement for the QCDD. In addition, the persons responsible for the QCDD for such a stablecoin will be required to include a clear statement that the stablecoin is not issued by a person with permission in the UK for issuing stablecoins, given the issuance of such stablecoins would not be authorised and regulated by the FCA.

2. Market Abuse Regime for Cryptoassets

The Market Abuse Regime for Cryptoassets is intended to enhance market integrity by requiring public disclosure of inside information and tackling insider dealing, unlawful disclosure of inside information and market manipulation in cryptoasset markets. The FCA has drawn on the existing UK Market Abuse Regulation (UK MAR) as a starting point but has adapted the framework to reflect the unique challenges of cryptoasset markets, such as their decentralised nature, the absence of identifiable issuers for some assets, and the prevalence of on-chain activity.

The Cryptoasset Regulations define inside information as information of a precise nature, which has not been made public, relating directly or indirectly to:

- an issuer or offeror of a relevant qualifying cryptoasset or a related instrument;
- an operator of a CATP on which a relevant qualifying cryptoasset is admitted to trade or is subject to an application seeking admission to trading; or
- a relevant qualifying cryptoasset or related instrument.

The regulations further define inside information as that which, if it were made public, would likely have a significant effect on the price of that relevant qualifying cryptoasset or related instrument. The FCA provided guidance and non-exhaustive examples of what may constitute inside information, which include information about admissions or cancellations from admission, the viability or instability of a stablecoin, and nonpublic information about code vulnerabilities.

The key proposals for the market abuse regime from the Consultation Paper are outlined below.

Inside Information Disclosure Requirements

- **Persons required to disclose inside information.** The proposed rules have broadened the responsibility for disclosure to persons beyond the issuer. Offerors and CATPs will also be required to publicly disclose inside information that directly

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concerns them. This is a necessary departure from UK MAR given the nature of cryptoassets market, as cryptoassets might have no identifiable issuer. Inside information can directly concern the issuer, a person responsible for the offer and CATPs where they become aware of such information in relation to a relevant qualifying cryptoasset that they have admitted to or are seeking to admit to trading.

- **Delayed disclosure is permitted in limited circumstances.** Except in limited circumstances, inside information must be disclosed as soon as possible. The approach to delayed disclosure of inside information is based on the UK MAR. Specifically, public disclosure may be delayed where immediate disclosure is likely to prejudice legitimate interests, the delay is not likely to mislead the public and confidentiality of the inside information can be ensured. Any person delaying disclosure will be required to keep records of the information and justification for the delay, and provide such records to the FCA on request.
- **The method of disseminating inside information.** Each of the issuer, offeror and CATP is required to publicly disclose inside information that directly concerns them. Each relevant person must publish inside information on its website and actively disseminate it through other channels (for example, social media or news outlets) used by consumers and other market participants. Following such publication, inside information will need to be uploaded on an FCA-owned centralised repository.
- **Requirement to maintain insider lists.** Issuers, offerors and CATPs will be required to draw up and maintain insider lists, a record of persons who have access to inside information. They will also have ultimate responsibility for lists maintained by entities working for them, such as professional advisers. The detailed requirements for insider lists will be based closely on those under UK MAR, with certain modifications such as the requirement to record wallet addresses if applicable.

Market Abuse Systems and Controls and Cross-Platform Information Sharing

- **Requirement to establish systems and controls.** CATPs and intermediaries will need to establish systems and controls to prevent, detect and disrupt market abuse. The inclusion of a duty to “disrupt” market abuse is a notable departure from UK MAR. For CATPs, this may include setting up systems enabling them to halt or suspend trading, warn users, restrict the activities of users and remove relevant qualifying cryptoassets from the CATP. In addition, CATPs and intermediaries will be required to monitor orders and transactions, and put in place personal account dealing arrangements, information barriers, employee training on market abuse, recordkeeping requirements and audit arrangements.

- **On-chain monitoring.** Large CATPs (defined as those with average annual revenue of over £10 million over the previous three years) will also be subject to rules on on-chain monitoring. These platforms will need to monitor on-chain activities relevant to their operations, which may include monitoring wallet interactions, token flows and transaction patterns of their platform or users.
- **Cross-platform information sharing.** Large CATPs will be required to share information with other large CATPs where they have reasonable grounds to suspect that market abuse has occurred, is occurring or is likely to occur, and making such disclosure is necessary to detect, prevent or disrupt the market abuse.

Legitimate Market Practices

- **Actions exempted from the market abuse prohibitions.** The FCA proposes to specify certain activities as legitimate market practices, including coin burning (permanently removing cryptoassets from circulation) and crypto stabilisation (supporting price stability, often during or after initial coin offering or secondary coin offering). Market making activity is also addressed, with rules clarifying circumstances under which a person who possesses inside information is not to be regarded as using that information and engaging in insider dealing.

Next Steps

The consultation closed on 12 February 2026. The FCA will publish further consultations in line with its crypto roadmap and will set out final rules and guidance in Policy Statements after considering all responses. Firms wishing to undertake any of the new cryptoasset regulated activities will need to be authorised by the FCA. The application period for firms that want to undertake the new cryptoasset regulated activities will be open from 30 September 2026 to 28 February 2027.

Firms that expect to operate as CATPs or intermediaries, or that are involved in the issuance and offering of qualifying cryptoassets, should consider the practical implications of the proposed regime. CATPs should consider their admission criteria and the required due diligence processes for assessing qualifying cryptoassets. The new regime will also require significant investment in market abuse surveillance infrastructure, including systems for monitoring orders and transactions. Additionally, firms will need to establish the governance frameworks to identify inside information, ensure timely disclosure and maintain insider lists. Early engagement with these requirements is critical, particularly as the FCA expects firms to be proactive in implementing the required systems and controls.