



ISSUE 01 · H1 2026

# The European Bitcoin Business Report

## The Reset

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Regulation, banking, custody, tax and payments  
for European businesses using Bitcoin.

# A note from the founder

This is the first issue of the European Bitcoin Business Report. We created it because the questions we hear most often still lack a good European reference point for business leaders.

There is no shortage of Bitcoin research. What is scarce is European context. A German manufacturer can read an excellent US report and still learn little about VAT on a Bitcoin payment, whether its provider is still authorised to serve it, or what a tax office in Munich is likely to expect in January. That gap is not analysis. It is Europe.



**Prashanth Chandrashekar**  
Founder, Bringin

This report covers Bitcoin only. That is a deliberate editorial choice. Stablecoins appear where they intersect with the questions European businesses actually face, payroll, settlement, the digital euro debate, but the subject of this report is Bitcoin: the asset a company may hold, the network it may get paid over, and the rules that now govern both.

The first half of 2026 was an important period for Bitcoin in Europe. MiCA's transitional period ended across the EU, and the market entered a new phase for businesses, treasurers and providers alike.

We have tried to describe that period plainly. Where the evidence was strong, we included it. Where a figure could not be traced confidently, we aimed to exclude it; corrections to the online edition are documented on page 30.

In May we sponsored MAD Bitcoin in Madrid and spent three days with founders, treasurers and advisers from across the continent. The same questions kept coming up, and they became the sections of this report.

We hope this report gives you a high-level, bird's-eye view of the Bitcoin ecosystem, with enough nuance to support better strategic decisions for your firm.

Prashanth Chandrashekar  
Founder, Bringin · Vilnius, July 2026

## About this report

Bringin publishes the European Bitcoin Business Report. Bringin Business appears in the provider directories in this report alongside companies it competes with. No provider paid to be included, and no provider saw this report before publication.

Nothing here is tax, legal or investment advice. Rates, thresholds and licensing positions change; verify anything you intend to act on with a qualified adviser in your own jurisdiction.

# Contents

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|          |                                                                                       |    |
|----------|---------------------------------------------------------------------------------------|----|
|          | <b>Executive summary</b>                                                              | 04 |
| <b>1</b> | <b>The Reset</b> MiCA, 1 July, and who is still allowed to operate                    | 05 |
| <b>2</b> | <b>The State of Bitcoin</b> The quarter in events, and the protocol                   | 08 |
| <b>3</b> | <b>The Market</b> Price, supply, flows, equities and the network                      | 10 |
| <b>4</b> | <b>Ownership &amp; Custody</b> The treasury reckoning and European holdings           | 15 |
| <b>5</b> | <b>Banking</b> Bank access, the digital euro, and the ECB                             | 18 |
| <b>6</b> | <b>Tax, Accounting &amp; Compliance</b> DAC8, corporate versus personal, the calendar | 20 |
| <b>7</b> | <b>Payments</b> Lightning, merchants and the Travel Rule problem                      | 24 |
|          | <b>What we are watching</b>                                                           | 28 |
|          | <b>Glossary</b>                                                                       | 29 |
|          | <b>Methodology and sources</b>                                                        | 30 |

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## How to read this report

Every section ends with a **So what** box setting out what the period means for three kinds of reader: a family office, a merchant or agency, and a Bitcoin-native startup. If you are short of time, read the executive summary and those seven boxes.

Every chart carries its source and date. Where public sources disagree materially — network hashrate is the clearest case — we name the series we used and the smoothing method rather than presenting one number as settled.

# Executive summary

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Five things changed for European businesses in the first half of 2026. Section 2 sets out the quarter's events in full, the quantum paper, the Morgan Stanley launch, the Iran toll, for readers who want the narrative rather than the summary.

## 1 MiCA sharply reduced the pool of registered providers

MiCA's transitional period closed on 1 July. Around 244 CASPs held authorisation across 25 jurisdictions, compared with roughly 3,167 pre-MiCA national registration entries across Europe. These are not like-for-like counts of unique active firms, so the gap should not be read as '92% of the market disappeared'. Binance withdrew its Greek application and said it would suspend services in France, Italy, Poland and Spain. The practical check is whether your provider appears on the ESMA register.

## 2 Bitcoin fell against the euro, and equities did not

Bitcoin opened the quarter at €58,983 and closed it at €51,305, a fall of 13.0%. April was strong at +10.3%; June was brutal at -18.8%. Over the same half-year European equity indices rose. Anyone who bought the "Bitcoin as inflation hedge" case in January had a hard six months, and any honest report has to say so.

## 3 The leveraged treasury model broke

On 1 June, Strategy disclosed that it had sold 32 BTC during 26-31 May - its first Bitcoin sale since December 2022 - then published a framework authorising up to \$1.25bn of further sales to fund dividends and interest. Nakamoto, Empery Digital and Genius Group also sold during the half. The companies in difficulty were those that borrowed to buy and owed cash on a schedule; operating businesses holding Bitcoin they earned were not affected.

## 4 Tax visibility became total

DAC8 took effect on 1 January. Service providers now collect identity and transaction data for automatic cross-border exchange, with the first information exchanges due by 30 September 2027. Italy raised its rate from 26% to 33% and removed the €2,000 exemption. Cyprus introduced a flat 8%. The Dutch lower house passed a bill proposing an actual-return Box 3 regime from 2028; Senate approval is still required.

## 5 Merchant acceptance quietly became a solved engineering problem

Public Lightning capacity was below its December 2025 peak. Square enabled eligible US sellers by default in March; BTCPay Server plugins cover most European e-commerce platforms.

The next step is demand: the infrastructure is largely in place, and the main remaining work is turning acceptance into habitual consumer spending while adapting to the accounting and Travel Rule requirements that come with it.

BTC Map's worldwide merchant count rose 13% in the quarter to roughly 26,000.

### THE THROUGH-LINE

Across these five stories, the same pattern emerges: Bitcoin in Europe is moving from a question of whether to a question of structure — through whom, under what licence, and on whose books. The speculative layer had a difficult half; the infrastructure layer had its most consequential half yet.

# 1

## The Reset

On 1 July 2026 the transitional period under the Markets in Crypto-Assets Regulation closed across the European Union. There was no extension and no further grandfathering. From that date, providing crypto-asset services to EU clients without a MiCA authorisation is a breach of EU law.

Chart 1 • The scale of the contraction

bringin

Pre-MiCA national  
registrations (2024)

3,167

Authorised CASPs  
(1 July 2026)

244

Baseline is total pre-MiCA **national registrations** across Europe in 2024, not the narrower pool of legacy EU registrations discussed below. Sources: ESMA interim MiCA register as at 1 July 2026; national register counts, 2024.

Roughly 3,167 pre-MiCA national registration entries existed across Europe, while 244 CASP authorisations were listed at the cut-off. The 92% gap compares different counts; it does not mean 92% of active firms or market volume disappeared. Against the narrower pool of around 1,200 legacy EU registrations, about 210 converted - roughly 17%.

Two things temper the drama. First, the licensed platforms already accounted for an estimated 95% of EU crypto transaction volume, so the market's centre of gravity had shifted long before the deadline. Second, many of the 3,167 were dormant shells; Poland alone accounted for over 1,400 registrations. But the legal position is unambiguous, and the practical consequences for anyone banking or transacting through an unlicensed provider are real.

### The deadline was never uniform

1 July 2026 was the outer limit, not a single national start line. Several member states chose shorter windows that had already closed: the Netherlands, Finland, Latvia, Hungary and Slovenia at six months, ending 30 June 2025; Sweden at nine months, ending 30 September 2025; Germany in December 2025. France, Malta and Luxembourg took the full eighteen months. A business operating across several member states has therefore been living under different rules in each of them for over a year.

## Four things that are widely misunderstood

**A pending application is not authorisation.** Only a granted authorisation under Article 63 permits continued service. Firms that filed late, or whose applications remain in assessment, are in the same legal position as firms that never applied.

**Transitional cover never allowed passporting.** A firm operating under a national transitional regime could not passport into other member states. Only full authorisation carries the single-market right.

**Reverse solicitation is a narrow exception, not a business model.** Third-country firms may not solicit EU clients through advertising, email, banners or similar means. Where a client genuinely approaches a non-EU provider on their own initiative, a narrow exemption exists. Regulators have signalled they will read it narrowly.

Outsourcing does not transfer regulatory responsibility. MiCA allows outsourcing under Article 73, but CASPs remain fully responsible. ESMA also says certain services - notably custody - cannot be delegated to entities that are not authorised CASPs. If your provider is a front end on somebody else's rails, ask which authorised entity actually provides each regulated service.

## Who left

**Binance** withdrew its MiCA application in Greece and notified clients in France, Italy, Poland and Spain that it would suspend services from 1 July, saying it would seek authorisation in France instead. **Gemini** wound down its UK and EEA retail operations in April despite holding both MiCA and MiFID II authorisations — a reminder that holding a licence and choosing to operate under it are different decisions. **Tether's USDT** remains unauthorised; Circle's USDC and EURC are the only top-ten stablecoins fully compliant, which means euro-denominated stablecoin settlement in regulated European venues now runs largely through one issuer.

Around 14 entities hold authorisation specifically to operate a trading platform. That is the number to keep in mind when someone describes the European market as crowded.

### Is your provider still legal? A four-step check

- 1. Find the legal entity name.** Not the brand. It is in the terms and conditions or the legal notice, usually at the foot of the website.
- 2. Search the ESMA register.** ESMA publishes the register of authorised CASPs. If the entity is absent, ask the provider directly and in writing.
- 3. Check the authorisation category.** Authorisation is granted per service. A firm licensed for custody is not thereby licensed to operate a trading platform or to execute orders for you.
- 4. Establish whose licence you are actually using.** Many products are a user interface over a third party's regulated rails. Ask which authorised entity holds your funds, in which member state, and under which national competent authority.

ESMA's interim register has been published as weekly CSV files and is being integrated into ESMA's permanent systems during 2026. Once complete, automated real-time authorisation checks before executing a transaction become practical for corporate treasuries.



## What comes next: MiCA 2

The end of grandfathering is not the end of the rulebook. A senior European Commission adviser has signalled that a successor to MiCA is being prepared, with a public consultation expected. Two proposals matter most to businesses.

The first is **centralised supervision**. ESMA supported transferring supervision of CASPs from fragmented national regimes to ESMA itself in April, and ESMA chair Verena Ross confirmed the Commission was developing plans along those lines. For a company operating in five member states, one supervisor instead of five is a material simplification. For a company that chose its jurisdiction carefully, it may not be welcome.

The second is **lower thresholds for euro-denominated stablecoin use in settlement**, which would sit alongside the digital euro work described in Section 5.

## The cost side nobody publishes

MiCA authorisation is extensive in scope. The ongoing burden firms report includes continuous transaction monitoring, suspicious activity reporting, five-year record retention, audit-ready documentation and a compliance function proportionate to the scale of the business. Bybit chief executive Ben Zhou stated publicly on 26 April that a MiCA licence alone is insufficient to run a profitable European business: derivatives and tokenised products can additionally engage MiFID II, while certain payment services involving euro-denominated e-money tokens can also engage payment or e-money authorisation requirements.

The practical consequence for a mid-sized European business is that the number of providers who can legally serve you across every service you need is smaller than the headline count of 244 suggests, and consolidation is likely to continue.

## “Compliance has shifted from a procedural requirement to a strategic imperative.”

Grant Thornton, February 2026

### SO WHAT

**Family offices.** Run the four-step check on every counterparty this quarter. Ask whether any service is delegated outside the authorised perimeter, and get the answer in writing.

**Merchants and agencies.** Your processor's licence is now a commercial risk, not a compliance footnote. If it is not authorised your ability to accept and settle stops without notice — confirm before your next peak trading period.

**Bitcoin startups.** Building on a partner's CASP authorisation is now the dominant European model. Make sure the delegation is structured so that the regulated activity genuinely sits with the authorised entity, and that your architecture does not quietly place you inside CASP scope.

# 2

## The State of Bitcoin

The quarter in the events that moved it.

| DATE       | EVENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Late March | Google publishes a quantum paper with two ECDLP-256 circuits using fewer than 1,200 or 1,450 logical qubits. Under stated hardware assumptions, Google estimates that fewer than 500,000 physical qubits could execute the circuits in a few minutes. Fault-tolerant hardware at that scale does not exist. See opposite.                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Late March | <b>Ledger launches Wallet 4.0</b> , responding to January's Global-e data breach. The app moves from a cold-storage interface to a full platform with portfolio tools and real-time transaction notifications.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 1 April    | Bitcoin opens the quarter at <b>€58,983</b> after months of drawdown. Fresh tariff shocks trigger sell-offs and liquidate leveraged long positions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 8 April    | <b>Iran and the Strait of Hormuz.</b> A spokesperson for Iran's Oil, Gas and Petrochemical Products Exporters' Union tells the Financial Times that tankers must email cargo details and pay a toll of roughly \$1 per barrel in cryptocurrency, with bitcoin cited, during a two-week ceasefire with the United States. Bloomberg had reported a week earlier that the IRGC was already levying similar tolls payable in yuan or stablecoins. Chainalysis subsequently noted that despite the reference to bitcoin, Iran is likely to prioritise stablecoins, consistent with its historical practice. TRM Labs reported ships had been charged up to \$2m since mid-March across several currencies, and that the extent of actual crypto use is unclear. |
| 8 April    | <b>Morgan Stanley launches the Morgan Stanley Bitcoin Trust (MSBT)</b> , the first Bitcoin ETF from a US bank. It attracts more than \$100m in its first week, described as the bank's most successful ETF launch to date, per Morgan Stanley's own disclosure and undercuts BlackRock's IBIT on fee.                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| April      | Over <b>€2bn of ETP inflows</b> and whale accumulation drive a 10.3% gain in euro terms, the strongest month of the half.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 28 April   | <b>Lightspark announces a Bitcoin-backed dollar account</b> at the Bitcoin 2026 conference, using the Bitcoin network as a neutral settlement layer and partnering with Visa for debit card off-ramps across Europe and 65+ countries.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Early May  | The Fear and Greed Index recovers from 40 to 50 after a <b>€450m single-day ETP inflow</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 4 May      | <b>Citrea</b> , a programmable layer built on Bitcoin, announces over \$50m in planned liquidity commitments from Galaxy Digital and other asset managers, and launches a ctUSD pre-deposit vault.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1 June     | <b>Strategy discloses first Bitcoin sale since 2022:</b> 32 BTC sold 26-31 May. See Section 4.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 17 June    | The <b>ECB raises rates</b> by 25 basis points.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 30 June    | Bitcoin closes the quarter at <b>€51,305</b> . The Fear and Greed Index reads 18 — extreme fear.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |



## The quantum question, answered properly

In late March a Google paper was widely reported as showing that a quantum computer could break Bitcoin's signatures in nine minutes. The reporting was misleading in both directions, and because boards are now asking about it, it is worth setting out precisely.

What the research actually says. The nine-minute figure describes the runtime of an attack on a machine that does not exist. Google's two circuits use fewer than 1,200 or 1,450 logical qubits, respectively, and 90m/70m Toffoli gates. Under stated superconducting-hardware assumptions, Google estimates execution with fewer than 500,000 physical qubits in a few minutes. Today's machines are far below the fault-tolerant scale required, so this is a migration-planning problem rather than an imminent break.

**Why it is still a real engineering question.** Bitcoin's exposure is concentrated in outputs whose public keys are already visible on chain — principally through address reuse and certain older script types. Estimates put roughly a third of supply in that category. Every output is additionally exposed at the moment of spending, when the public key enters the mempool. The risk is therefore not sudden; it is a migration problem with a multi-year lead time.

**What is being built.** Discussion continued through the quarter on **BIP 360**, a proactive, opt-in proposal that removes the quantum-vulnerable key-spend path from Taproot outputs and keeps public keys off chain until spending. Related proposals include re-enabling OP\_CAT to support hash-based signatures, and rate-limiting spends from vulnerable outputs to stabilise any transition. Blockstream and other European-linked research groups continue to publish on the problem.

### WHAT A EUROPEAN CFO SHOULD TAKE FROM THIS

We do not view quantum computing as an imminent threat, and it is not a reason to delay a treasury or payments decision this year. That said, two measures are free and worth taking now: **avoid address reuse**, and **ask your custody provider for their post-quantum migration timeline**.

## Elsewhere in the protocol and its edges

**Lightning Labs** open-sourced a suite of tools in February enabling AI agents to run Lightning nodes, make payments and host paid endpoints without identity or API keys. The toolkit uses the L402 protocol, which builds on the long-dormant HTTP 402 "Payment Required" status code, to let software agents pay for digital resources without human intervention. Whether or not agentic commerce arrives at the scale its advocates predict, Bitcoin now has a working machine-payable standard and no competitor has one that settles in a bearer asset.

A **Bitcoin Policy Institute** study in March found that across 9,072 scenarios, frontier AI models selected Bitcoin in 48.3% of responses, rising to 79.1% when asked specifically to choose a long-term store of value. We report it as a curiosity rather than a signal; it measures training data, not markets.

### SO WHAT

**Family offices.** Quantum is a custody-hygiene question this year, not an allocation question. Put it on the agenda as a vendor question — migration plan, timeline, address types and take it off the risk register as an imminent threat.

**Merchants and agencies.** Nothing in this section changes a decision you make this quarter. The Iran story is worth understanding only because it is the version of Bitcoin your board has probably read about.

**Bitcoin startups.** L402 is the one item here with commercial consequences. Machine-payable endpoints settling in a bearer asset have no equivalent on card rails, and the tooling is now open source.

## 3

## The Market

**-13.0%**

BTC/EUR, Q2 2026

**-31.2%**

BTC/EUR, H1 2026

**€51,305**

Close, 30 June 2026

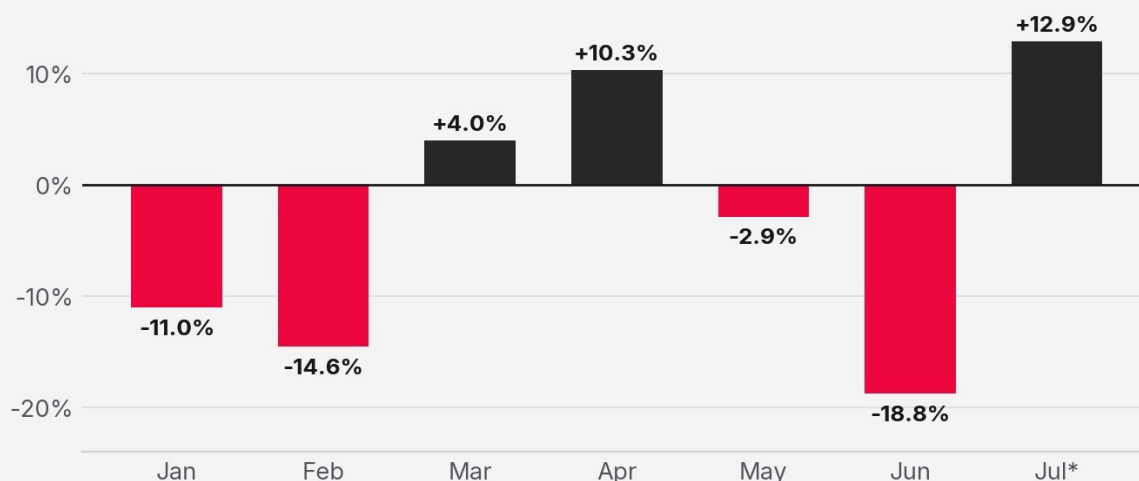
**2.41%**

Average daily volatility, 2026

Bitcoin opened the second quarter at €58,983 and closed it at €51,305. Within the quarter it traded as high as €70,226 on 6 May and as low as €50,879 on the final day, a peak-to-trough range of 27.6%. For the half-year, Bitcoin fell 31.2% against the euro from a January opening of €74,590, having reached €83,966 on 14 January.

Chart 2 • Bitcoin against the euro, monthly change 2026

bringin



Source: Exchange Rates UK BTC/EUR daily series. \*July to 22 July 2026. All figures euro-denominated; dollar returns differ.

April was the strongest month of the half at +10.3%, supported by ETP inflows and a broad recovery in risk assets after March's weakness. May gave back 2.9%. June fell 18.8% — the worst month of the year — on a combination of Iran-related geopolitical risk, the ECB's 25 basis point rate rise on 17 June, and Strategy's shift from buyer to seller.

Two notes on the numbers. This report is euro-denominated throughout: the widely quoted April gain of 13.5% is the dollar figure, and in euros the month returned 10.3%. And the sentiment arc matters as much as the price. The Fear and Greed Index recovered to neutral in early May before falling to 18, deep in extreme fear, by 30 June.

Chart 3 • Bitcoin against the euro, 24 April to 30 June 2026

bringin



Source: Exchange Rates UK BTC/EUR daily closes. The daily series is shown from 24 April, the earliest date in the 90-day window returned by the source at time of compilation. April in full is covered by the monthly series opposite.

## The comparison nobody in Bitcoin wants to print

Over the same half-year in which Bitcoin fell 31% against the euro, European equities rose. The Euro Stoxx 50 gained roughly 18.6% over the trailing twelve months to late July, and the STOXX Europe 600 entered its Q2 reporting season with earnings running well ahead of the growth rate anticipated at the end of March.

We publish that because a report that only prints the flattering comparison is not worth reading next quarter. The honest framing is that Bitcoin behaved as a high-beta risk asset in the first half of 2026 — correlated to equities on the way up in April, and considerably more violent on the way down in June. Its realised volatility now sits broadly in the range of large high-growth technology stocks rather than in a category of its own.

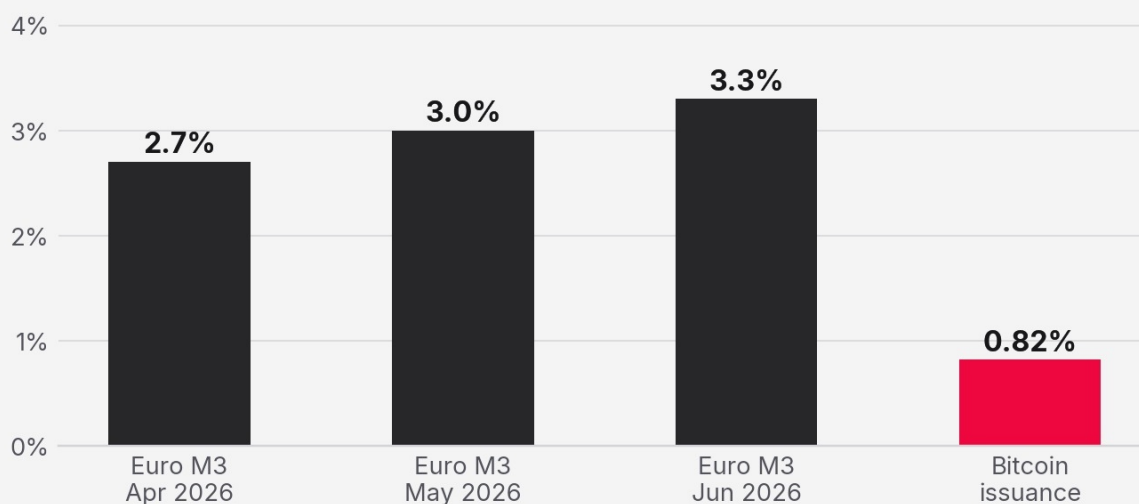
## Supply: the one comparison that is actually structural

Euro area M3 grew at an annual rate of 3.3% in June 2026, up from 3.0% in May and 2.7% in April. In absolute terms the stock rose from €17.435 trillion in April to €17.552 trillion in May — an increase of €117 billion in a single month. Bitcoin's supply grew by roughly 40,950 coins over the whole quarter, from about 20,009,555 to about 20,050,505, an increase of 0.20%. Annualised, Bitcoin's issuance rate is 0.82%.

Chart 4 • Annual growth in money supply

bringin

Annual growth rate — both series on the same 12-month basis



Both series are annual growth rates on the same 12-month basis. Sources: ECB monetary developments releases, April–June 2026 (May revised from 3.2% to 3.0%). Bitcoin issuance annualised from the 3.125 BTC block subsidy at the ten-minute target:  $3.125 \times 144 \times 365 = 164,250$  BTC on a supply of approximately 20.05 million.

Neither figure is a forecast. One is the outcome of monetary policy decisions taken by a committee; the other is arithmetic fixed in 2009 and verifiable by anyone running a node. That difference is the entire structural case, and it is unaffected by a bad quarter.

## European investors bought the drawdown. Then they stopped.

The most interesting European data of the quarter sits in the fund flow numbers, and we have not seen it reported elsewhere. Through April and into May, American investors sold while European investors bought.

Chart 5 • Weekly digital asset ETP flows, US versus Europe

bringin



In the week to 18 May, total outflows reached \$1.07bn — the first negative week in seven — with the United States alone accounting for \$1,140m of redemptions. Because US outflows exceeded the global total, Europe was a net *positive* contributor that week: Switzerland took in \$22.8m, Germany \$22.0m and the Netherlands \$7.5m.

That divergence broke in the week to 26 May. Outflows totalled \$1.47bn, with Bitcoin alone accounting for \$1,315m — the largest weekly Bitcoin outflow of the year. By the week to 1 June, outflows reached \$1.67bn, taking the three-week total to \$4.21bn and bringing assets under management down to \$141bn from \$148bn.

CoinShares attributed the reversal to Iran-related geopolitical risk, compounded by Strategy's disclosure that it had begun selling.

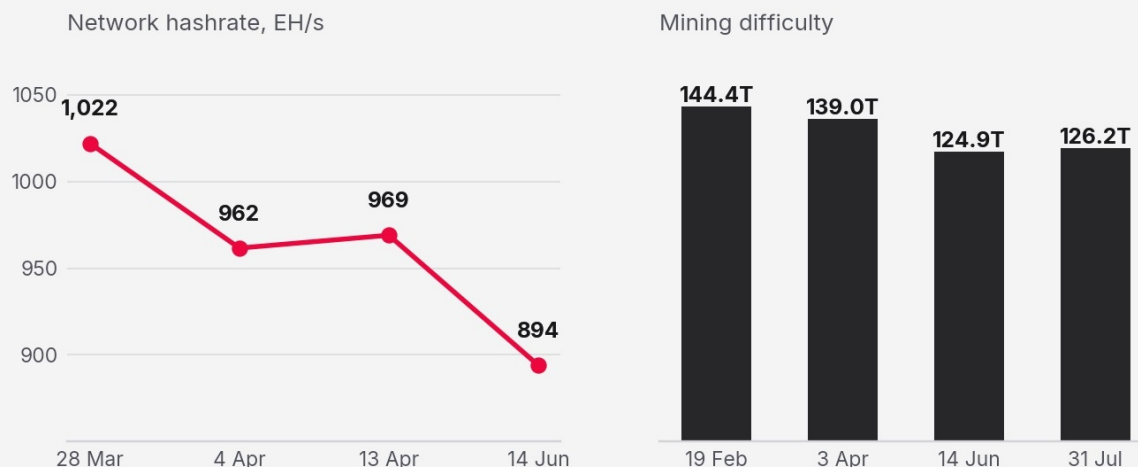
### WHY THIS MATTERS FOR A EUROPEAN BUSINESS

We think regional flow divergence is a reasonable proxy for where the marginal institutional buyer sits. For six weeks, that buyer was European. It took a geopolitical shock plus a structural seller to break the pattern which says something about the depth of European institutional demand that headline global figures obscure.

## The network: miners moved megawatts to AI

Chart 6 · Network hashrate and mining difficulty, 2026

bringin



Sources: Hashrate Index (Luxor), 7-day simple moving average; Galaxy Research and CoinWarz for difficulty. Public hashrate estimates vary by provider and smoothing method; readings above are 7-day SMA except where noted.

Bitcoin's network hashrate passed 1,000 EH/s — one zettahash per second — on 28 March 2026, reaching 1,022 EH/s. It then declined through the quarter. By 4 April it stood at 961.6 EH/s, recovered slightly to 969 EH/s on 13 April, and by mid-June the seven-day average had fallen to approximately 894 EH/s.

On 14 June, difficulty fell 10.09% from 138.96 trillion to 124.93 trillion — the second largest downward adjustment of 2026 and the eleventh largest on record. The resulting difficulty was the lowest level since July 2025.

The cause is economic. Hashprice reached an all-time low near \$27.89 per PH/s per day in the first quarter and stayed at or below breakeven for many operators through the second. With production economics underwater at a Bitcoin price near \$64,000, infrastructure operators have been reallocating megawatts from mining to artificial intelligence and high-performance computing. Around 252 EH/s of legacy hardware went offline over the preceding quarter; net capacity fell by less — roughly 128 EH/s from the March peak — because efficient new machines were being commissioned at the same time. The fleet is being replaced, with old hardware retiring faster than replacements arrive.

We do not read this as a security concern at these levels. In our view it is an energy-market story with direct European relevance: the same data centre capacity, grid connections and power contracts now have two competing bidders, and mining is currently losing that auction.

### Blockspace was cheap all quarter

The mempool stayed uncongested throughout, with the great majority of transactions clearing at low single-digit sat/vB fee rates — an on-chain settlement cost well under one euro for most of the period. Combined with difficulty at a twelve-month low, Q2 was one of the cheapest windows in years to consolidate a treasury position, open Lightning channels or restructure custody.

#### SO WHAT

**Family offices.** A 31% half-year drawdown against the euro is the base rate, not the exception. If your allocation policy has not been stress-tested against a 30% six-month fall, it has not been tested.

**Merchants and agencies.** The volatility figures in this section are the single strongest argument for settling to euros on receipt rather than holding. Section 7 puts numbers on exactly what holding would have cost you.

**Bitcoin startups.** If your model assumes cheap blockspace, this quarter was favourable. If it assumes miners as customers, their margins are the tightest in years.



## 4

## Ownership & Custody

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The defining corporate story of the half-year was not an acquisition. It was a disposal.

On 1 June 2026, Strategy disclosed that it had sold 32 BTC during 26-31 May - its first sale since December 2022. The amount was trivial. The signal was not. On 29 June it published a framework authorising up to \$1.25bn of Bitcoin sales to fund dividends, interest and buybacks. On 6 July it disclosed that it had sold 3,588 BTC for \$216m across 29 June-5 July, the largest disposal in its history, to fund preferred dividends.

The mechanism that made the model work had disappeared. For years Strategy's shares traded at a premium to the value of its Bitcoin, allowing it to issue equity, buy more Bitcoin, and repeat. When that premium compressed toward parity, share issuance stopped being a costless way to accumulate, while the cash obligations on its preferred securities remained. Its Bitcoin sits at a cost basis near \$75,700 per coin, above the prevailing market price.

It was not only Strategy. Nakamoto Holdings sold 284 BTC in March, roughly 5% of its holdings. Empery Digital sold 370 BTC in April to repay a term loan. Genius Group liquidated its remaining 84 BTC in April to pay down \$8.5m of debt. Most digital asset treasury companies have halted purchases or begun selling since the market turned in October 2025.

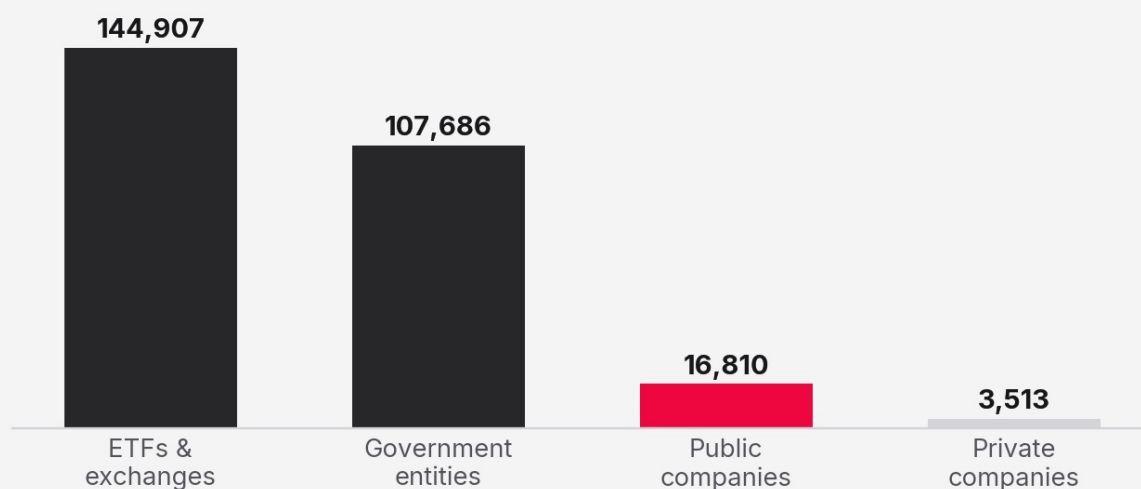
### THE CONCLUSION THAT MATTERS FOR EUROPEAN BUSINESSES

In our view, leverage rather than Bitcoin was the variable that broke. The companies that got into difficulty were the ones that **borrowed money to buy and owed cash to somebody on a schedule**. The ones that did not were operating businesses that earned Bitcoin, kept what they could afford to keep, and converted the rest to meet payroll. The first half of 2026 was not a verdict on holding Bitcoin. It was a verdict on holding it with borrowed money and a dividend calendar.

## Who actually holds Bitcoin in Europe

Chart 7 · European reported holdings by source category, BTC

bringin



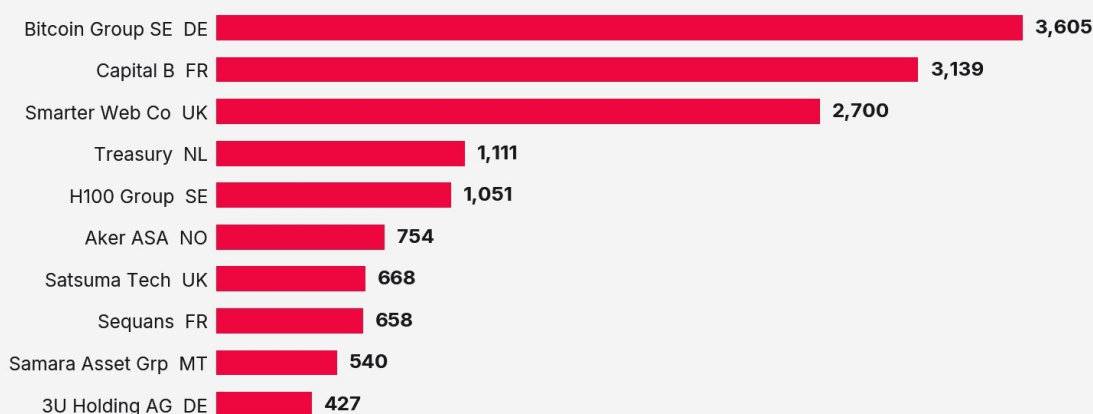
Source: BitcoinTreasuries.net, Europe region, 31 July 2026. Categories reproduce the source taxonomy; the 'government' total includes declared holdings of Ukrainian public officials, and the ETF/exchange category also includes other custodians.

European public companies hold 16,810 BTC across 41 entities, worth roughly \$1.08bn at the 31 July valuation date, when Bitcoin traded near \$64,000 — above the 30 June close used elsewhere in this report. European **private** companies hold a further **3,513 BTC**. That figure — around 17,000 BTC — is the one that circulates in European Bitcoin discussion. In isolation it is badly misleading.

BitcoinTreasuries reports 107,686 BTC in its government category and 144,907 BTC in its ETFs, exchanges and other custodians category. The labels require care: 46,351 BTC in the government total are declared holdings of Ukrainian public officials, not necessarily state reserves, while the other category includes custodial holdings. These totals are source categories, not a clean split of beneficial ownership.

Chart 8 · Largest European listed holders, BTC

bringin



Source: BitcoinTreasuries.net, as at 31 July 2026.

The concentration is severe: the top three account for 9,444 BTC, or 56% of the European listed total. More than half the companies on the list hold under 100 BTC. By count the United Kingdom dominates with roughly 15 listed holders, followed by Sweden with six.

One entry is worth noting on its own: **Intesa Sanpaolo**, Italy's largest bank, holds 11 BTC. Financially immaterial against a \$129bn market capitalisation. As a signal about European banking, less so.

## Custody: what changed this half

**France stepped back from self-custody reporting.** On 8 April the National Assembly voted to require self-custody wallet owners to declare holdings above €5,000 annually. The DGFIP warned that publishing such data would make holders targets; France had recorded 45 physical attacks on people linked to crypto during 2026. On 28 April the joint parliamentary committee voted not to retain the article. The EU Anti-Money Laundering Authority could revive the question at European level.

**Institutional infrastructure kept building.** Ledger introduced Enterprise HSM On-Premise in March, letting institutions hold keys in their own data centres. Citi announced core custody and key management for the year. **Counterparty risk stayed real.** In May, Kraken's parent filed a \$25m claim against its custodian Etana alleging misuse and commingling of assets. "We hold your keys" is only as good as the counterparty behind it.

## Four custody problems specific to regulated European entities

|                          |                                                                                                                                                           |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Governance</b>        | No approval workflows, role-based access or audit trail. Board oversight and external audit become difficult to satisfy.                                  |
| <b>Exclusive control</b> | Auditors struggle to verify exclusive control where a third party shares key access. The question is not "are the coins there" but "who could move them". |
| <b>Insurance</b>         | No mainstream insurer covers Bitcoin on a hardware wallet in an office safe. The company self-insures with no recourse.                                   |
| <b>Key-person risk</b>   | Whoever holds the keys becomes a personal security target.                                                                                                |

## European institutional custody providers

| PROVIDER       | BASE         | MODEL                                                          |
|----------------|--------------|----------------------------------------------------------------|
| Liana Business | France       | Open-source Bitcoin-native multisig, timelocked recovery       |
| Komainu        | Jersey       | Nomura / Ledger / CoinShares JV; segregated wallets            |
| Bitcoin Suisse | Switzerland  | FINMA-supervised multi-signing vault with cold storage         |
| CheckSig       | Italy        | Managed custody; on-chain proof of reserves                    |
| BitGo          | US / Germany | BaFin-regulated in Germany; institutional multisig             |
| Taurus         | Switzerland  | Deutsche Bank-backed custody and tokenisation for banks        |
| Zodia Custody  | UK / EU      | Standard Chartered-backed; shared control between institutions |

Inclusion is editorial, not an endorsement. Verify authorisation on the ESMA register before engaging any provider.

### SO WHAT

**Family offices.** Ask your custodian the hard version of the custody question — who could technically move the funds — not the soft version about encryption. Get it in writing for your auditor.

**Merchants and agencies.** You do not need institutional custody to accept Bitcoin, only a wallet you control and a settlement path to euros. Do not let a custody conversation delay a payments decision.

**Bitcoin startups.** The treasury lesson applies to you at smaller scale: Bitcoin bought with borrowed money creates a cash obligation that does not care about your conviction. Bitcoin earned from revenue does not.

# 5

## Banking

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European banks spent the half-year moving from announcement to pilot, while the ECB moved from consultation to procurement.

### The ECB

Three developments matter. On 30 March the ECB began accepting eligible marketable assets issued in central securities depositories using DLT-based services as collateral for credit operations. The move integrates DLT-based securities infrastructure into the Eurosystem collateral framework; it does not mean Bitcoin itself, or Bitcoin infrastructure, is part of ECB monetary policy.

On **13 April** the ECB formally supported transferring supervision of crypto-asset service providers from national regimes to ESMA.

On **17 June** the ECB raised rates by 25 basis points, taking the deposit facility to 2.25% and the main refinancing rate to 2.40%. Lending continued to grow despite the increase, with adjusted loans to non-financial corporations running at 4.0% annual growth in June.

### The digital euro

EU leaders set a target of finalising digital euro legislation by the end of 2026. On **14 July** the ECB selected 36 payment service providers for its pilot programme, including Deutsche Bank, UniCredit and Revolut, with a beta launch targeted for the second half of 2027. Separately, through May and June the ECB issued repeated warnings about the risk euro-denominated stablecoins pose to bank deposits and lending channels.

Proponents argue a digital euro is necessary to keep public money available as an alternative to private assets and dollar stablecoins. Critics point to privacy and to the degree of control a central bank would hold over payments. Both positions are defensible; what is not in dispute is the timeline, and businesses should plan on the assumption that a digital euro pilot exists in 2027.

### Bank and infrastructure launches

**Deutsche Bank**, Germany's largest bank, is launching Bitcoin and crypto custody for corporate and institutional clients in partnership with Austria's Bitpanda and Switzerland's Taurus. **Sparkassen-Finanzgruppe** announced plans to introduce crypto trading to its 50 million customers. **BPCE**, France's second largest banking group, plans to roll Bitcoin trading out to 12 million retail customers across 25 regional entities during 2026. Twelve major European banks have formed the **Qivalis** consortium to launch a euro-backed stablecoin in the second half of 2026.

On the infrastructure side, **Lightspark** acquired Estonian VASP **Striga**, combining Lightning infrastructure with regulated euro rails, IBANs and card issuing across the EEA. **Blockrise** clients can now obtain a full IBAN in their own name through Bunq's banking licence, with euro deposits — not Bitcoin holdings — protected up to €100,000 under the Deposit Guarantee Scheme.

**8 of 20**

Top EU banks with live crypto services, most still in pilot

**35%**

European investors who would switch banks for better access

**28%**

Spanish investor Bitcoin adoption, highest in Europe

**36**

PSPs selected for the ECB digital euro pilot

Sources: BlockStories, March 2026; Boerse Stuttgart Digital survey of 6,000 investors in Germany, Italy, Spain and France; ECB, July 2026.

Across the EU, EEA and UK, 51 banks held a VASP registration or licence as of March 2026 according to the Global VASP Database and TheBanks.eu. This should not be read as 51 banks needing a standalone CASP authorisation: under MiCA Article 60, EU credit institutions can provide crypto-asset services through a notification to their competent authority, subject to the applicable MiCA requirements. We will track how many actually activate services in Issue 02.

## Ten reasons your bank still says no

1. MiCA licensing complexity and dual regulation with PSD2
2. Travel Rule compliance friction on regulated crypto transfers
3. Punitive capital treatment: a 1250% risk weight on crypto exposures
4. Integrating with core banking systems that are thirty years old
5. Custody liability uncertainty under MiCA in loss or hack scenarios
6. No internal expertise in Lightning node operation or liquidity management
7. Customer attrition to neobanks while committees deliberate
8. AML and KYC frameworks that do not map onto Lightning payments
9. Unresolved accounting and tax treatment across EU jurisdictions
10. Board-level reputational hesitancy despite customer demand

## Banking and rails providers

| PROVIDER                      | BASE         | WHAT IT DOES                                                                                                         |
|-------------------------------|--------------|----------------------------------------------------------------------------------------------------------------------|
| Lightspark / Striga           | US / Estonia | Lightning payments, IBANs, card issuing and custody via a single API across 30 EEA countries                         |
| Bitpanda Technology Solutions | Austria      | White-label infrastructure powering Deutsche Bank and other European banks                                           |
| Taurus                        | Switzerland  | Custody and tokenisation infrastructure for European banks                                                           |
| SG-FORGE                      | France       | Société Générale's MiCA-licensed subsidiary; custody, issuance and transfer                                          |
| Bitstack                      | France       | Bitcoin-only savings and DCA infrastructure for neobanks and fintechs                                                |
| Bringin                       | Lithuania    | Corporate vIBAN, SEPA, treasury conversion and Lightning settlement; operates on MiCA-authorised CASP infrastructure |

Bringin publishes this report and is listed alphabetically within its category. No provider paid for inclusion.

### SO WHAT

**Family offices.** Deutsche Bank, BPCE and Sparkassen entering the market means the bank you already use may offer custody within eighteen months. That is worth waiting for only if your timeline is eighteen months.

**Merchants and agencies.** The 1250% risk weight is why your relationship manager keeps saying no, and it will not change soon. Solve the euro settlement problem outside your incumbent bank rather than trying to convince it.

**Bitcoin startups.** The Lightspark–Striga combination is the template: Lightning capability plus a regulated euro entity in one stack. Expect more consolidation of exactly that shape.

## 6

# Tax, Accounting & Compliance

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On 1 January 2026, tax visibility on Bitcoin in Europe became effectively total.

DAC8 took effect across the Union. Crypto-asset service providers must now collect user identity and granular transaction data and report it to national tax authorities. The first reporting year is 2026, with automatic cross-border exchange between EU tax authorities due by **30 September 2027**. The United Kingdom is implementing CARF-aligned rules on the same principle.

DAC8 changes no tax rate. It changes the enforcement model. Until now, cross-border holdings depended substantially on self-reporting. From this year, your provider reports you.

**READ THIS BEFORE THE TABLE OVERLEAF**

A large share of published European “crypto tax rates” reflects personal capital gains treatment rather than company taxation. For corporate holders, Bitcoin gains are typically taxed as ordinary business income at the standard corporate rate, which may be materially higher or lower depending on jurisdiction.

## The Germany trap

Germany is a frequent source of misunderstanding in Bitcoin tax guides because the well-known 0% treatment after a one-year holding period applies to private individuals only. A GmbH or AG holding Bitcoin on its balance sheet does not benefit from that exemption. Corporate gains are generally taxed as ordinary business income and are subject to corporate income tax, solidarity surcharge and trade tax, with a combined effective rate that is often around 30%, depending on location. Similar structural gaps, in smaller form, exists in Portugal, the Czech Republic, Slovenia and Switzerland.



## Personal vs corporate taxes, side by side

| JURISDICTION   | INDIVIDUAL            | CHARGED AS                         | COMPANY | NOTES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------|-----------------------|------------------------------------|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Germany        | 0% after 1 year       | Private sale, §23 EStG — not a CGT | ~30%    | Tax-free only if held more than a year, and only for private individuals. Within the year it is taxed at your ordinary income rate up to 45% plus solidarity surcharge, with a €1,000 annual threshold — exceed it and the whole gain is taxable. Companies get no holding-period relief; the ~30% combines corporation tax, solidarity surcharge and trade tax, and varies with the municipal multiplier. <b>Reform risk:</b> the 2027 federal budget adopted by cabinet on 6 July 2026 commits to rules on taxing crypto-assets, but no bill exists and the widely quoted 26.375% appears in no official document. |
| Italy          | 33%                   | Misc. income (redditi diversi)     | ~27.8%  | Individual rate raised from 26% on 1 January 2026 and the €2,000 exemption abolished. Corporate gains are generally subject to IRES plus IRAP. Alternative elective regimes may apply in some cases and should be checked with local advice.                                                                                                                                                                                                                                                                                                                                                                         |
| France         | 31.4% flat levy (PFU) | 12.8% tax + 18.6% social           | 25%     | The 31.4% PFU is 12.8% income tax plus 18.6% social contributions. It applies to occasional private disposals; professional activity is taxed as business income. A surtax applies to companies with turnover above €1.5bn for 2026.                                                                                                                                                                                                                                                                                                                                                                                 |
| Portugal       | 28% / 0%              | Capital gains, category G          | ~29.5%  | 28% on individual disposals within one year, nil after. The one-year clock is the whole regime, and it does not apply to companies, which have no equivalent relief.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Spain          | 19–30%                | Savings income, not general        | 25%     | Savings scale: 19% to €6k, 21% to €50k, 23% to €200k, 27% to €300k, 30% above. The top band rose to 30% in 2025; guides still quoting 28% are out of date. Foreign holdings above €50,000 must be declared separately on form 721.                                                                                                                                                                                                                                                                                                                                                                                   |
| United Kingdom | 18% / 24%             | Capital gains tax                  | 25%     | 18% basic / 24% higher are the post-October 2024 Budget rates; guides still showing 10%/20% are out of date. Individual annual exempt amount £3,000. Companies pay corporation tax on the gain as part of trading or chargeable-gains profit, with no annual allowance.                                                                                                                                                                                                                                                                                                                                              |
| Czech Republic | 0% after 3 years      | Other income, §10                  | 21%     | Exemption requires a <b>three-year</b> holding period, capped at CZK 40m per year, with a separate small-transaction exemption under CZK 100,000. Do not assume the German one-year rule applies here. No corporate equivalent.                                                                                                                                                                                                                                                                                                                                                                                      |
| Slovenia       | 0%                    | Outside income tax entirely        | 22%     | <b>No change on 1 January 2026.</b> The 25% flat tax was a government bill that passed first reading in September 2025, was pulled from the parliamentary agenda that November and was never adopted or published. Crypto is not listed as capital in the income tax act, so occasional private disposals — including converting to euros and spending — fall outside the charge altogether. Systematic trading is taxed as business income. The 22% company rate is a temporary rise from 19%, running 2024–2028.                                                                                                   |
| Switzerland    | 0%                    | No CGT; cantonal wealth tax        | ~12–21% | Private investors meeting the Circular 36 safe-harbour criteria pay no capital gains tax, but the holding is still declared and taxed under cantonal <b>wealth</b> tax each year. Trade actively enough and you are reclassified as professional, at which point gains become income and social contributions follow. Corporate rates vary by canton.                                                                                                                                                                                                                                                                |
| Cyprus         | 8%                    | Standalone crypto levy             | 15%     | New individual flat rate from 1 January 2026 covering sales, swaps and payments — one of the few European regimes written specifically for crypto rather than borrowed from an existing schedule. The corporate rate is now 15%, up from the long-standing 12.5%.                                                                                                                                                                                                                                                                                                                                                    |
| Malta          | 0–35%                 | Income tax if trading              | 35%     | No single individual rate. Long-held investment positions generally fall outside capital gains tax; trading activity is taxed as income at up to 35%. The distinction is fact-specific. Refund mechanisms materially reduce the effective corporate rate for many structures.                                                                                                                                                                                                                                                                                                                                        |

**Use with advice.** The individual column shows the headline rate a private holder faces; the **charged as** column matters at least as much, because a charge sitting in personal income tax behaves differently from a capital gains tax under treaties, loss relief and social contributions. The company column shows combined statutory corporate income tax rates that generally apply to Bitcoin gains treated as ordinary business income. Actual treatment still depends on your accounting standard, whether activity constitutes trading, and local surcharges. The Netherlands is set out separately overleaf because it is not a gains tax at all. Germany, the Netherlands and Slovenia were re-checked against primary sources on 15 August 2026. A starting point for a conversation with an adviser, not a substitute for one.

## Four more jurisdictions, and the Dutch exception

| JURISDICTION  | INDIVIDUAL                          | CHARGED AS                                      | COMPANY  | NOTES                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------|-------------------------------------|-------------------------------------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Estonia       | 22%                                 | Income tax; loss relief only via MiCA providers | 0% / 22% | Crypto gains are taxed as ordinary income. From 2025, crypto-assets acquired through a <b>MiCA-authorised crypto-asset service provider or authorised issuer</b> are treated as financial assets and can be used within Estonia's investment-account system. <b>Losses from transactions through MiCA-authorised providers can be deducted against gains; losses from non-authorised providers cannot.</b> Crypto-to-crypto swaps and spending are taxable disposals. Companies are taxed when profits are distributed: retained and reinvested profits are not taxed until distribution, when corporate income tax applies at 22/78 of the net distribution. An annual basic exemption may apply to individuals. |
| Greece        | 15% in practice                     | Securities CGT, by practice                     | 22%      | <b>The rate is real but the legal basis is not.</b> Greece has no crypto-specific regime, and decision DED 1330/2024 held that Article 42A of Law 4172/2013 lists qualifying securities exhaustively, so crypto falls outside it. In practice tax offices have accepted declarations that treat crypto like other financial capital gains, carrying the flat <b>15%</b> . That is administrative practice, not law, and it is not binding. Systematic activity can still be reclassified as business income at 9–44%. A finance ministry draft would codify 15% with a €500 annual exemption and would not tax crypto-to-crypto swaps.                                                                            |
| Luxembourg    | 0% / 45.78% after / within 6 months | Speculative gain, at income rates               | 23.87%   | Governed by the circular of 26 July 2018, unchanged since. A disposal <b>within six months</b> is a speculative gain taxed at progressive rates; beyond six months a private holding is exempt. The €500 is a threshold, not an allowance — at or above it the whole year's gain is taxable. Swaps and spending are disposals. <b>Weighted average cost is mandatory and FIFO is expressly prohibited</b> , which is the opposite of most of Europe. Company figure is Luxembourg City; net wealth tax separately reaches company-held crypto at market value every year even though unrealised gains escape income tax.                                                                                          |
| Liechtenstein | 0% plus wealth tax                  | No CGT; wealth via notional yield               | 12.5%    | Not an EU member, so DAC8 does not apply. Private capital gains on movable assets are exempt from income tax; wealth is taxed instead through a notional 4% yield added to taxable income, giving an effective 0.8–0.9% a year at the top — you pay on the holding, not the gain. Corporate income tax is 12.5% and has <b>not</b> risen; the 15% in circulation is the separate top-up tax for groups above €750m of revenue.                                                                                                                                                                                                                                                                                    |

### The Netherlands is not a gains tax at all

Dutch individuals are the outlier in this report. They pay tax on the Bitcoin they hold, not on anything they sell, and they pay it whether the year was good or bad.

|                          |                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>In force, 2026</b>    | <b>LAW</b>              | Crypto is an "other asset" in Box 3. The state assumes a <b>deemed return of 6.00%</b> on its value at 1 January and taxes that at <b>36%</b> — an effective <b>2.16% of the holding a year</b> , above a €59,357 per-person allowance. No disposal is required and no actual gain is required. A counter-evidence rule, in force since July 2025, lets you elect to be taxed on your <b>actual</b> return — which for this purpose already includes unrealised gains — where that figure is lower. |
| <b>Companies</b>         |                         | Box 3 does not apply. A BV pays 19% on the first €200,000 of profit and 25.8% above, on realised business profit; unrealised gains are generally not taxed until realisation.                                                                                                                                                                                                                                                                                                                       |
| <b>Proposed for 2028</b> | <b>ONE CHAMBER ONLY</b> | The Actual Return Act would replace the deemed return with taxation of actual return, including unrealised gains for many assets. It passed the lower house on 12 February 2026 and is before the Senate. The government continues to target 1 January 2028, but the proposal is not law and both timing and details can still change.                                                                                                                                                              |

Reporting is not taxation. All ten jurisdictions gained crypto reporting obligations from 1 January 2026 — DAC8 in the EU states, the OECD framework plus a bilateral EU protocol in Liechtenstein. First data reaches tax authorities in 2027. None of it changes what is taxable. Checked against primary sources on 15 August 2026.

## Four structural problems, whoever you are

1. **Every disposal is a taxable event in most jurisdictions.** Selling, swapping and spending all count.
2. **Cost basis tracking is hard.** Bitcoin acquired across multiple venues and years requires a history most holders do not have.
3. Self-reporting is over. Providers collect 2026 data; first cross-border exchange is due by 30 Sep 2027.
4. **The rules diverge sharply.** Four member states means four regimes, with different personal and corporate answers in each.

## The regulatory calendar

| DATE        | EVENT                                                                                                                                                            |
|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 Jan 2026  | DAC8 in force; providers begin collecting identity and transaction data                                                                                          |
| 1 Jul 2026  | MiCA transitional period ends across the EU; unauthorised firms must cease                                                                                       |
| H2 2026     | ESMA register moves to permanent systems; Qivalis euro stablecoin launch target; EU target for finalising digital euro legislation; MiCA 2 consultation expected |
| Jul 2027    | AMLR restrictions on anonymous crypto accounts and anonymity-enhancing coins apply to obliged entities                                                           |
| 30 Sep 2027 | <b>First automatic cross-border exchange of DAC8 data between EU tax authorities</b>                                                                             |
| H2 2027     | Digital euro beta launch target                                                                                                                                  |
| 2028        | Dutch Box 3 actual-return regime scheduled, subject to Senate approval                                                                                           |

## Compliance and tax reporting providers

ESMA published final guidelines on market abuse, asset classification, suitability and reverse solicitation. Cryptio raised \$45m on 12 March.

| PROVIDER              | BASE        | COVERAGE                                                |
|-----------------------|-------------|---------------------------------------------------------|
| Blockpit              | Austria     | German, Austrian and Swiss tax frameworks               |
| Chainalysis           | EU presence | On-chain analytics, AML screening, sanctions compliance |
| CoinTracking          | Germany     | Reports for 100+ countries                              |
| Cryptio               | France      | Institutional accounting and treasury reporting         |
| Flagright             | Germany     | Real-time AML monitoring, Travel Rule automation        |
| Koinly                | UK / EU     | Country-specific reports supporting EU rules            |
| Sumsub                | UK / EU     | KYC and KYB, Travel Rule, MiCA onboarding               |
| Global Relay / InnReg | UK / EU     | Audit trails; MiCA licensing advisory                   |

Listed alphabetically. Inclusion is editorial and not an endorsement.

### SO WHAT

**Family offices.** The 30 September 2027 exchange date belongs in the board calendar. Anything not reconciled before then will be reconciled for you, using your provider's data.

**Merchants and agencies.** Ask your processor today for an itemised export showing the euro value at the moment of each payment. Without it your VAT and corporation tax position is unsupported.

**Bitcoin startups.** If you issue or provide payment services involving euro-denominated e-money tokens, check whether payment or e-money authorisation is required in addition to CASP coverage.

## 7

# Payments

Accepting Bitcoin stopped being an engineering problem some time ago. It is now a compliance problem and a demand problem, in that order.

## 26,000

Merchants on BTC Map worldwide, June 2026

## +13%

Quarter on quarter growth

## ~4,898

BTC in public Lightning channel capacity

## 41,080

Public Lightning channels

Sources: BTC Map, April and June 2026; mempool.space via Spark research, May 2026. Private and unannounced Lightning channels are estimated to hold at least twice the publicly visible capacity.

### The network is ready

Lightning's public capacity was about 4,898 BTC in May 2026, below the December 2025 peak of 5,606 BTC, across 41,080 channels and 17,438 nodes. Three upgrades matured in the period. **BOLT12 offers** - reusable payment identifiers rather than single-use invoices - are now natively supported by Core Lightning, LDK and Eclair, with LND the holdout. **Splicing**, which resizes a channel without closing it, is on by default in Core Lightning. Phoenix shipped Taproot channel support.

From 30 March, Square switched Bitcoin payments on by default for eligible US sellers, with dollar settlement by default. Square Bitcoin is not offered to non-US sellers; no European rollout timeline has been announced.

The volume picture supports the capacity picture. A River report in February found the Lightning Network had surpassed \$1bn in monthly volume and grown 300% during 2025, with the average transaction reaching \$223 — up from around \$24 two years earlier. That shift in average size matters more than the headline: Lightning is being used for commerce and settlement, not only for tipping.

### “The goal is to make self-custody as easy as custodial solutions.”

Roy Sheinfeld, Chief Executive, Breez

At events the technology performs. BTC Prague, working with BTCPay Server, NiceHash and Blink, processed 7,079 vendor transactions worth approximately 1.3m CZK across the 2025 conference.

### Launches

**Opago** became an Open Ecosystem Partner at SAP in February, integrating Lightning into SAP Customer Checkout and SAP Omnichannel POS — the first credible path into large European ERP estates. **Numo** launched a free, open-source Android tap-to-pay app powered by Cashu, letting merchants accept Bitcoin over NFC with no additional hardware and, notably, offline capability. **Lyzi** states it is natively compatible with over a million points of sale across Europe through Verifone, Nepting and Ingenico integrations, with automatic euro settlement.

On the wallet side, **Wallet of Satoshi** has been available in the EU only as a self-custodial wallet since the start of 2026, in response to MiCA requirements on custodial providers. A series of wallets built on Breez SDK infrastructure followed, including Bringin, Cake, Primal, Club Orange and Flash.

## Why accepting Bitcoin is a Travel Rule problem

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This is the part of merchant acceptance that almost nobody writes down, and it shapes the architecture of many compliant products in Europe.

A direct-to-regulated-account design can create significant Travel Rule obligations. When a customer payment enters a CASP environment, the CASP must obtain and transmit the required originator and beneficiary information and apply the checks required by the Transfer of Funds Regulation. The exact data flow depends on whether another CASP or a self-hosted address is involved; the regulation does not impose a universal KYC-at-the-till model.

One way to reduce this friction is to keep the customer-to-merchant payment wallet-to-wallet, with the merchant receiving into a wallet it controls. Pure peer-to-peer transfers between self-hosted wallets sit outside the TFR's CASP transfer requirements.

The regulated leg then occurs when the merchant transfers from its own wallet to a CASP for conversion or settlement. Depending on the amount and risk, the CASP may need to verify ownership or control of the self-hosted address and collect other required information.

### THE ARCHITECTURAL TRADE-OFF

Per-payment instant conversion is not universally prohibited in Europe. It can, however, create Travel Rule information and verification obligations on each payment depending on the parties and rails involved. Accumulate-then-settle is therefore one practical architecture - not the only legally compliant one. Ask a provider exactly how it discharges the Travel Rule on each flow.

For merchants that choose this model, batching can be operationally useful. Forty customer payments across a trading day can collapse into one merchant-initiated settlement, at a moment the merchant chooses. That can mean fewer off-ramp events, less operational noise and a settlement decision a finance team consciously controls.

It can also have an accounting benefit. One settlement per day, threshold or week produces a clean, reconcilable record with a single euro settlement value, rather than many micro-disposals - although the underlying customer payments still need to be recorded correctly for accounting and tax purposes.

## What to ask a payments provider

1. Where does the customer-to-merchant transfer take place, and is it inside or outside regulated rails?
2. Who holds the Bitcoin between receipt and settlement, and who could technically move it?
3. Which authorised CASP discharges the Travel Rule obligation on the settlement leg?
4. Can you export itemised transactions with the euro value at the time of payment?
5. If we leave, can we export the full transaction history, and who owns the wallet?

## The volatility problem, in numbers

Price volatility is the first objection on every merchant's list, and it is the correct objection. A merchant is not an investor. A merchant has payroll on the 25th and supplier invoices on 30-day terms, both denominated in euros. Between accepting a payment and paying those bills, price movement is not upside. It is a hole in the accounts.

The second quarter of 2026 puts a number on the hole.

### If you accepted €10,000 of Bitcoin and held it

| PERIOD                   | CHANGE | YOU WERE LEFT WITH |
|--------------------------|--------|--------------------|
| 1 June – 30 June 2026    | -18.8% | <b>€8,124</b>      |
| 1 April – 30 June 2026   | -13.0% | <b>€8,698</b>      |
| 1 January – 30 June 2026 | -31.2% | <b>€6,878</b>      |

Source: Exchange Rates UK BTC/EUR daily closes. Illustrative; excludes fees.

Even April — the best month of the half at +10.3% — traded a low of €57,062 against a high of €67,810. That is an 18.8% range inside a single month in which the price finished up. Bitcoin's daily volatility across 2026 has averaged 2.41%.

The answer is not to argue about time horizons with your finance director. It is not to hold the exposure at all: accept Bitcoin, settle to euros, and keep only what you have consciously decided to keep, in a wallet you control.

### A NOTE ON WHO PUBLISHES THIS REPORT

Bringin publishes the European Bitcoin Business Report. Bringin Business appears in the provider directories alongside firms it competes with, and no provider paid for inclusion.

Bringin Business is included here because it solves a real operational problem: customers pay in Bitcoin, euros arrive in a company account, and the business can keep only the Bitcoin it chooses to keep in its own wallet. The vIBAN is issued in the company's name, SEPA transfers are handled through regulated rails, and the underlying service is operated by a MiCA-authorised CASP. After 1 July 2026, providers serving EU clients need a lawful MiCA basis to do so.

[bringin.app/business](https://bringin.app/business)



## Five real obstacles for merchants

1. **Volatility between payment and settlement.** Quantified opposite.
2. **Unclear accounting and tax treatment.** VAT on Bitcoin transactions, capital gains on held BTC and reporting obligations all differ across EU jurisdictions.
3. **Travel Rule and KYC friction.** Processors must collect counterparty data, a burden that did not exist with card payments.
4. **Demand is still niche.** Most European consumers do not hold or want to spend Bitcoin, so integration cost may not yet justify volume.
5. **Integration complexity.** Most European POS and e-commerce systems do not natively support Bitcoin or Lightning, requiring plugins or custom work.

Obstacle four is the honest one. Around 12–15% of European e-commerce businesses are reported to offer crypto checkout, rising to 35–40% in VPN, hosting and AI services. We flag those as vendor-sourced and directional. What is not in doubt is that a general retailer in most of Europe sees low single-digit Bitcoin volume today. The case for accepting it is cross-border reach, chargeback elimination and fee structure — not immediate volume.

## Payments providers

| PROVIDER            | BASE            | MODEL                                                                        |
|---------------------|-----------------|------------------------------------------------------------------------------|
| BTCPay Server       | Open source, EU | Self-hosted, no fees, no intermediary; Lightning support                     |
| Bringin             | Lithuania       | Accept BTC, settle EUR to a corporate vIBAN; works with Opago, BTCPay, Flash |
| CoinGate            | Lithuania       | Lightning gateway; Shopify and WooCommerce plugins                           |
| Flash               | EU              | Lightning payment tooling and merchant integrations                          |
| Lightspark / Striga | US / Estonia    | Enterprise Lightning infrastructure across 30 EEA countries                  |
| Lyzi                | France          | POS terminal integrations with automatic euro settlement                     |
| Opago               | Germany         | SAP Open Ecosystem Partner; ERP and POS integration                          |
| Swapin              | Estonia         | Crypto-to-IBAN; customer pays BTC, merchant receives euros                   |

Listed alphabetically. Inclusion is editorial and not an endorsement. Verify authorisation status on the ESMA register before engaging any provider.

### SO WHAT

**Family offices.** Payments is not your section, but the Travel Rule logic opposite applies to any inbound transfer from a third party into a regulated account. The same rules that shape merchant architecture shape your distribution and receipt flows.

**Merchants and agencies.** Start with BTCPay Server plus a euro settlement partner. It costs almost nothing to test, it does not lock you in, and it answers the demand question with your own data rather than someone else's survey.

**Bitcoin startups.** We think the Opago-SAP partnership is the most underrated development of the half. Large European businesses run on ERP, and Bitcoin acceptance that does not reach the ERP does not reach the enterprise.

# What we are watching

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Six questions we expect to be able to answer in Issue 02.

## 1 How much of the pre-MiCA pool actually stopped?

The legal position on 1 July was clear. Enforcement is a separate question. France and the Netherlands have signalled active enforcement; several jurisdictions have not. By January we should be able to report on what regulators actually did.

## 2 Does the treasury unwind continue?

Strategy has authorised \$1.25bn of sales and used a fraction of it. If Bitcoin remains below its cost basis into the fourth quarter, the pace of corporate selling becomes the dominant supply story — and European listed holders, concentrated in three names, are not immune.

## 3 Does Square come to Europe?

Square auto-enabled Bitcoin payments for eligible US sellers in March, with no European rollout announced. If that changes, European merchant acceptance could move from niche integration to mainstream POS distribution.

## 4 Where does hashrate settle against AI demand?

Mining lost an energy auction to high-performance computing this half. Whether that reverses depends on price, and the answer has consequences for European energy markets as much as for Bitcoin.

## 5 What does MiCA 2 propose?

The consultation is expected. Centralised ESMA supervision would reshape jurisdictional strategy for every firm in this report.

## 6 Does the digital euro change bank behaviour?

Thirty-six payment service providers are now inside the pilot. Whether that accelerates or delays their Bitcoin plans is genuinely uncertain, and we will ask them.

### Tell us what can be improved

This is our first issue. If a figure is out of date, a provider is missing, or a jurisdiction is misrepresented, we would like to correct it in Issue 02 with attribution.

We also welcome input on which sections were most useful, which were least useful, and what should be tracked next quarter that is not covered here.

### Issue 02 — January 2027

The European Bitcoin Business Report is published twice yearly. To receive the next issue on release, or to send a correction, visit [bringin.app/business](https://bringin.app/business).

# Glossary

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## MiCA

Markets in Crypto-Assets Regulation. The EU's single rulebook for crypto-assets and the firms that service them. Fully applicable since December 2024; transitional cover ended 1 July 2026.

## CASP

Crypto-Asset Service Provider. A firm authorised under MiCA to provide specified services — custody, exchange, execution, transfer. Authorisation is granted per service, not in general.

## VASP

Virtual Asset Service Provider. The pre-MiCA national registration category. A legacy VASP registration is no longer a legal basis for serving EU clients.

## TFR / Travel Rule

Transfer of Funds Regulation. Requires identifying information on both sides of a crypto transfer, and verification of self-hosted wallets above €1,000.

## DAC8

The EU directive requiring crypto service providers to report user identity and transaction data to tax authorities, with automatic cross-border exchange from 30 September 2027. In practice: assume your provider files a return naming you and itemising your transactions, and reconcile your own records to it.

## CARF

Crypto-Asset Reporting Framework. The OECD standard DAC8 implements in the EU; the UK is adopting an aligned regime.

## DORA

Digital Operational Resilience Act. EU rules on ICT risk, incident reporting and third-party oversight for financial entities.

## PSD2 / EMI

Payment services rules and the Electronic Money Institution licence. Issuing e-money tokens or providing payment services involving them can require payment or e-money authorisation in addition to MiCA.

## MiFID II

The EU framework for financial instruments. Derivatives and tokenised securities require MiFID II authorisation on top of MiCA.

## vIBAN

Virtual IBAN. A euro account identifier issued in your company's name on a licensed institution's rails, usable for ordinary SEPA transfers.

## SEPA Instant

Euro payments settling in under ten seconds, available across the SEPA area.

## Lightning Network

A payment layer on top of Bitcoin. Transfers settle in seconds at negligible cost by moving balances within pre-funded channels rather than writing every payment to the blockchain.

## Self-custody

Holding the private keys that control your Bitcoin, rather than relying on a third party. It removes counterparty risk and adds operational and governance responsibility.

## mNAV

Market value divided by net asset value. For a treasury company, the ratio of market capitalisation to the value of its holdings. Compression below 1 removes the ability to issue equity accretively.

## Hashprice

Mining revenue per unit of computing power per day. The key measure of mining profitability.

# Methodology and sources

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## Reporting period

This issue covers the first half of 2026, with primary focus on the second quarter (1 April to 30 June 2026). Because the MiCA transitional period closed on 1 July, one day after the quarter, that event and its immediate aftermath are included. Where an item falls outside the window it is dated explicitly.

## Currency

All Bitcoin price and performance figures are euro-denominated using a single BTC/EUR daily close series throughout. Dollar figures appear only where the underlying source reports in dollars — principally fund flows, US corporate disclosures and mining economics — and are labelled as such. Euro and dollar returns for the same period differ materially and are not interchangeable.

## Where sources disagree

Public network hashrate estimates vary widely by provider and smoothing method; readings between 840 EH/s and 1.02 ZH/s were in circulation for the same period. We use Hashrate Index (Luxor) seven-day simple moving average readings and state the date of each. Readers comparing against another provider should expect differences of 5–15% from methodology alone.

## What we excluded

Several widely circulated figures were considered and left out because they could not be traced to a primary source or because the underlying definition was unclear. Where a figure is vendor-reported and material, it is labelled as such in the text rather than presented as verified.

## Primary sources used

### Market and macro

European Central Bank — monetary developments releases and data portal  
Exchange Rates UK — BTC/EUR daily series  
STOXX — monthly index news  
CoinShares — weekly digital asset fund flows

### Regulation

ESMA — interim MiCA register, statements and guidelines  
CSSF, BaFin, AMF and other national competent authorities  
European Commission — DAC8 documentation  
EU Blockchain Observatory  
Elliptic, Chainalysis, TRM Labs — regulatory analysis  
Sumsb, InnReg — MiCA implementation guides

### Network and on-chain

mempool.space  
Hashrate Index (Luxor)  
Bitcoin Visuals, Amboss — Lightning statistics  
Galaxy Research — difficulty adjustments

### Holdings and adoption

BitcoinTreasuries.net  
BTC Map  
River, Breez, Epoch VC — ecosystem reports

### Tax

Coincub — European crypto tax guides  
Koinly, BITmarkets, CoinLedger  
National tax authority publications

## Corrections

Revised 15 August 2026. This online edition corrects and clarifies the quantum-resource estimate, France tax rate, Dutch proposal status, Square geography, MiCA outsourcing, DAC8 timing, ECB/DLT wording, Travel Rule architecture and holdings-category interpretation. Future corrections will be listed in Issue 02.