

# ECSPR Licensing

---

” Insights from the public ESMA Register of  
Crowdfunding Service Providers -  
2022-2024

Mikel Iglesias and Benat Solino

- INSPIRING TOMORROW'S FINANCE -

[WWW.EUROCROWD.ORG](http://WWW.EUROCROWD.ORG)



Title: ECSPR Licensing—Insights from the public ESMA Register of Crowdfunding Service Providers—2022-2024

Research and data manipulation: Mikel Iglesias and Benat Solino

Version 1.1 date 24 April 2025

Copyright © EURO CROWD SRL/BV 2025  
All rights reserved.

We encourage the use of our own data, publications and multimedia products (sound, image, video, etc.) in line with our Use of EURO CROWD Material policy as set out in our terms and conditions which can be accessed here <https://eurocrowd.org/use-of-materials/>

## **EURO CROWD**

SQ North, BD Roi Albert II 4  
1000 Brussels, Belgium  
[info@eurocrowd.org](mailto:info@eurocrowd.org)  
<https://eurocrowd.org/>



# BACKGROUND

In January 2025 the European Securities and Markets Authority (ESMA) released its first annual market report on the EU crowdfunding sector, based on data provided by National Competent Authorities (NCAs) under the European Crowdfunding Service Providers Regulation (ECSPR) on 8 January 2025.

This inaugural report analyses a sample of 98 crowdfunding service providers from 17 EU Member States, offering key insights into the market for 2023. A shortcoming of the ESMA report remains that not all markets are represented, notably Spain which has an active market.

The overall findings are largely in line with data published by EUROCROWD during 2024 based on own analysis of more than 2,000 transactions.

## Key Findings by ESMA:

### Market Size:

- Over €1 billion of crowdfunding was raised across the EU in 2023.

### Funding Models:

- Loan-based crowdfunding dominated the market, accounting for 65% of total funds raised.
- Debt-based crowdfunding contributed 17%, while equity-based crowdfunding made up 6%.

- Loan-based projects raised significantly smaller average amounts per project compared to debt- and equity-based projects.

### Investor Profile:

- 87% of investors were retail, typically contributing smaller amounts than sophisticated or professional investors.

### Top Economic Sectors:

- Professional, scientific, and technical services received the most funding (33%).
- Construction projects followed, attracting 21% of total funds.

### Country Highlights:

- France led in both capital raised and number of platforms, followed by the Netherlands.
- Lithuania had the largest number of investors, reflecting its mature national crowdfunding framework.

# EXECUTIVE SUMMARY

The European Crowdfunding Service Providers Regulation (ECSPR) has reshaped the European crowdfunding market, but its implementation has revealed regulatory inconsistencies that hinder its full potential. While the regulation provides a strong foundation for investor protection and market integrity, its application has revealed challenges for both platforms (CSPs) and National Competent Authorities (NCAs).

## Key Findings:

- Many crowdfunding platforms struggle with compliance due to inconsistencies in NCA interpretations, delays in licensing, and uncertainty around reporting requirements as showcased in the limited uptake of cross-border licenses at less than 30%.
- NCAs may face resource constraints and differing enforcement approaches, leading to fragmentation in supervision and uncertainty for platforms operating cross-border.
- The current compliance burden risks limiting market growth, innovation, and access to alternative finance, particularly for SMEs.

To address these challenges, the report outlines targeted actions for both platforms and NCAs:

## Platforms should:

- Enhance internal compliance frameworks with clear processes and dedicated expertise.
- Improve transparency in reporting and investor protection measures.
- Strengthen engagement with NCAs to clarify regulatory expectations.

## NCAs should:

- Streamline and harmonize approval processes across jurisdictions.
- Provide clearer guidance and improve communication with platforms.
- Increase resources for enforcement to ensure consistent application of ECSPR.

Both CSPs and NCAs can facilitate a more predictable, efficient, and innovation-friendly crowdfunding market within the EU. The successful implementation of ECSPR will depend on continued collaboration, regulatory clarity, and proactive compliance efforts.

# INTRODUCTION

Next to the data reporting by ESMA, the ESMA register of Crowdfunding Service Providers serves as a key source of information on licensed crowdfunding service providers (CSPs) and is the only official database recognized by law, offering insights into the evolving regulatory landscape.

While ECSPR has been applicable since 2021, crowdfunding platforms operating under national laws prior to its introduction benefited from a two-year transition period before they were required to switch to the new regime. To better understand how CSPs have navigated the licensing process, we analysed data from the ESMA register over the past three years.

In this report we examine the number of CSPs obtaining licenses per year and per EU member state, the types of services they provide, and the legal structures chosen for

registration. Additionally, we explored home and host member state selections, cross-border activity, and discrepancies between the ESMA register and CSPs' own website information.

This analysis provides insights for investors, businesses seeking funding, and policymakers. While regulators and platforms should already be aware of these trends, the reality is that not all market participants are tracking developments closely. Even a straightforward analysis reveals notable patterns, and with deeper intelligence, we can further interpret anomalies.

# ECSPR LICENSING TRENDS 2022-2024

## By Member State

The ESMA register reveals a steady increase in CSP licenses across EU member states since ECSPR's introduction, though the pace of authorizations has varied significantly. Some jurisdictions saw an early surge in registrations, while others experienced more gradual adoption.

Our analysis highlights the most active member states in granting licenses annually, reflecting differences in regulatory efficiency, market maturity, and industry demand. National competent authorities (NCAs) and political factors also influenced these trends. With the original deadline for licensing existing operators set for November 2022, professional platforms sought approval early. For example, the Dutch NCA encouraged platforms to start the process in early 2022, leading to the

Netherlands issuing the highest number of licenses that year.

Conversely, lobbying efforts by France and others resulted in an optional one-year extension, pushing the deadline to November 2023. This led to a surge in licensing activity in 2023, particularly in France, Italy, Spain, and Lithuania. However, delays in transposing ECSPR into national law in Italy and Portugal meant some licensing processes spilled into 2024. Some licenses issued in 2024 likely represent new market entrants, with 2025 expected to provide further clarity on market expansion.

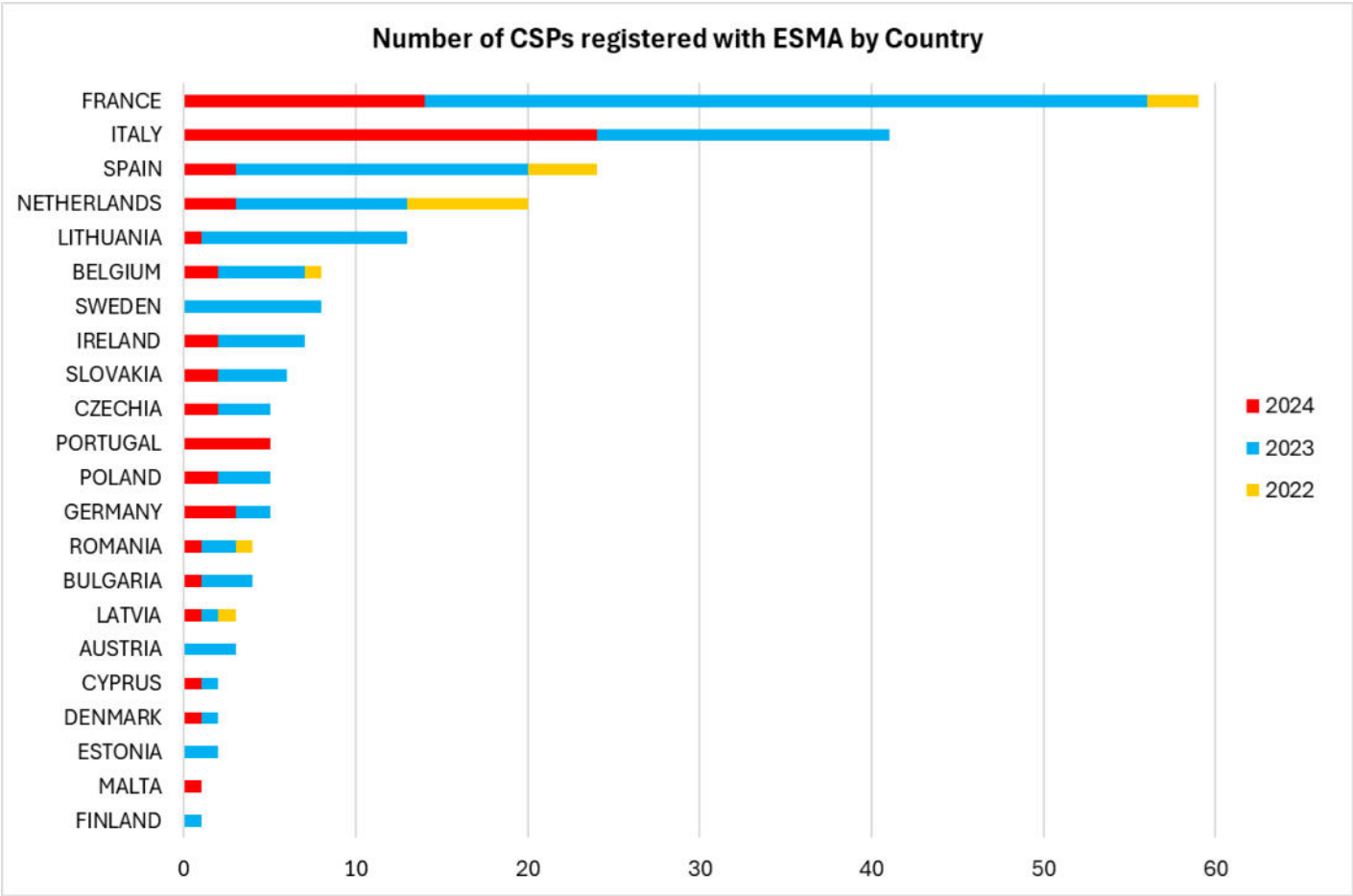
Figure 1 "Number of CSPs registered with ESMA by Country" illustrate licensing trends from 2022 to 2024 by country. We find most licensing activity in 2023, the year after the transition period for existing platforms ended.

Most licenses were issued in France, Italy, Spain, and the Netherlands, followed by smaller EU member states like Lithuania. Only in Italy and Portugal we see a shift in licensing toward 2021 due to political reasons. We can therefore assume that incumbent players have been the main driver for licensing so far. Notably, Germany, the EU's largest economy, is conspicuously underrepresented in these figures.

We find more activity regarding licensing generally in the larger EU economies – markets that one might have anticipated to be leading in development of financial

activity. We also notice that Italy and Portugal have been lagging by one year due to the slow adaptation of EU law by national policy makers, while in Germany we find a significant lower uptake in ECSPR licensing that the size of the economy and incumbent crowdfunding market would have suggested. The German market remains market by national alternative options that keep most platforms within the grey capital market and outside of trustworthy, prudential legal frameworks.

Figure 1



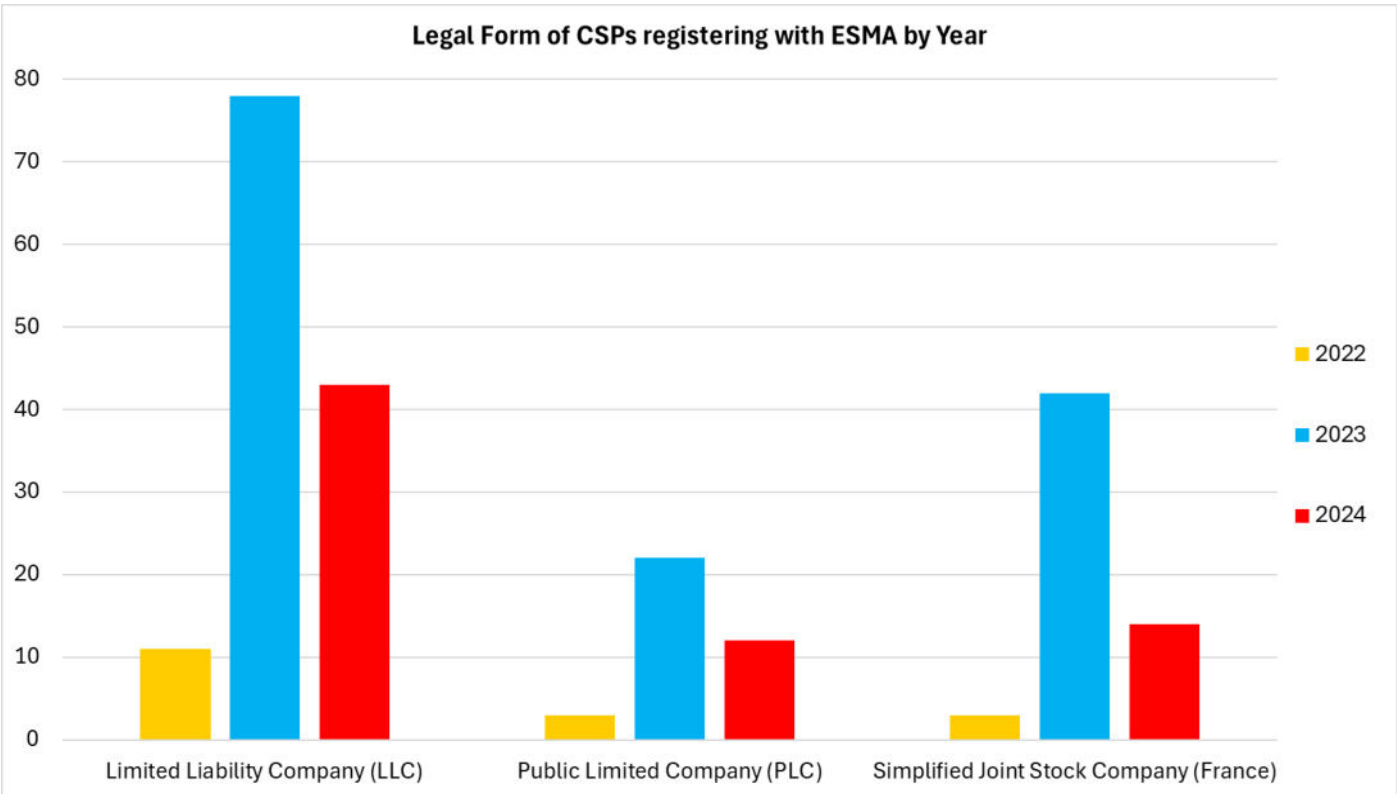
Source: Eurocrowd.org

## Legal Forms Chosen by CSPs

The choice of legal structure affects a CSP’s liability, taxation, and governance requirements. Our analysis of registered CSPs reveals a diverse range of legal forms, from limited liability companies to public limited companies and partnerships. All CSP data listed in the ESMA database relate to the registered head offices within the home member state, i.e. the EU Member State in which the CSP has acquired its license.

The data shows a clear preference for limited liability companies, see the graph below “Legal Form of CSPs registering with ESMA by Year” with significantly fewer platforms structured as public limited companies. In France, a simplified joint stock company structure serves as an intermediate option and has been widely adopted by CSPs in that market.

Figure 2



Source: Eurocrowd.org

## Service Offerings of Licensed CSPs

Under ECSPR, crowdfunding platforms can provide investment-based and lending-based services, with additional options such as individual portfolio management or nominee structures in some jurisdictions. The ESMA register categorizes CSPs based on their licensed activities, offering a snapshot of market preferences and strategic positioning.

Our findings, see Figure 3 “Type of Crowdfunding Services offered by CSPs registered with ESMA”, indicate that while most CSPs focus on a single service type, an increasing number are expanding their offerings to cater to diverse investor and project owner needs.

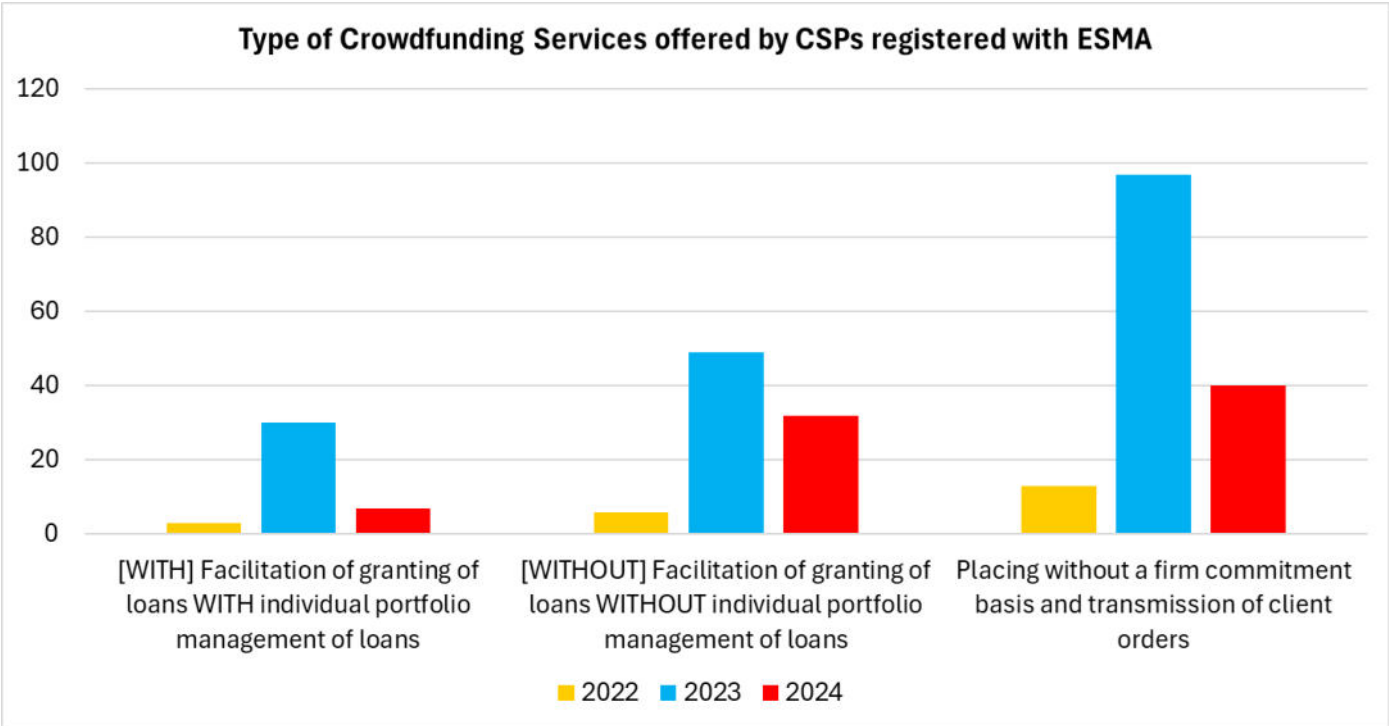
This trend suggests a move toward greater platform consolidation and heightened competition. Notably, as platforms offer multiple types of services, the total number of platforms indicated in the graph is higher than the actual due to double counting.



While Figure 3 shows the number of Registrations for services with ESMA, Figure 4 shows the split of

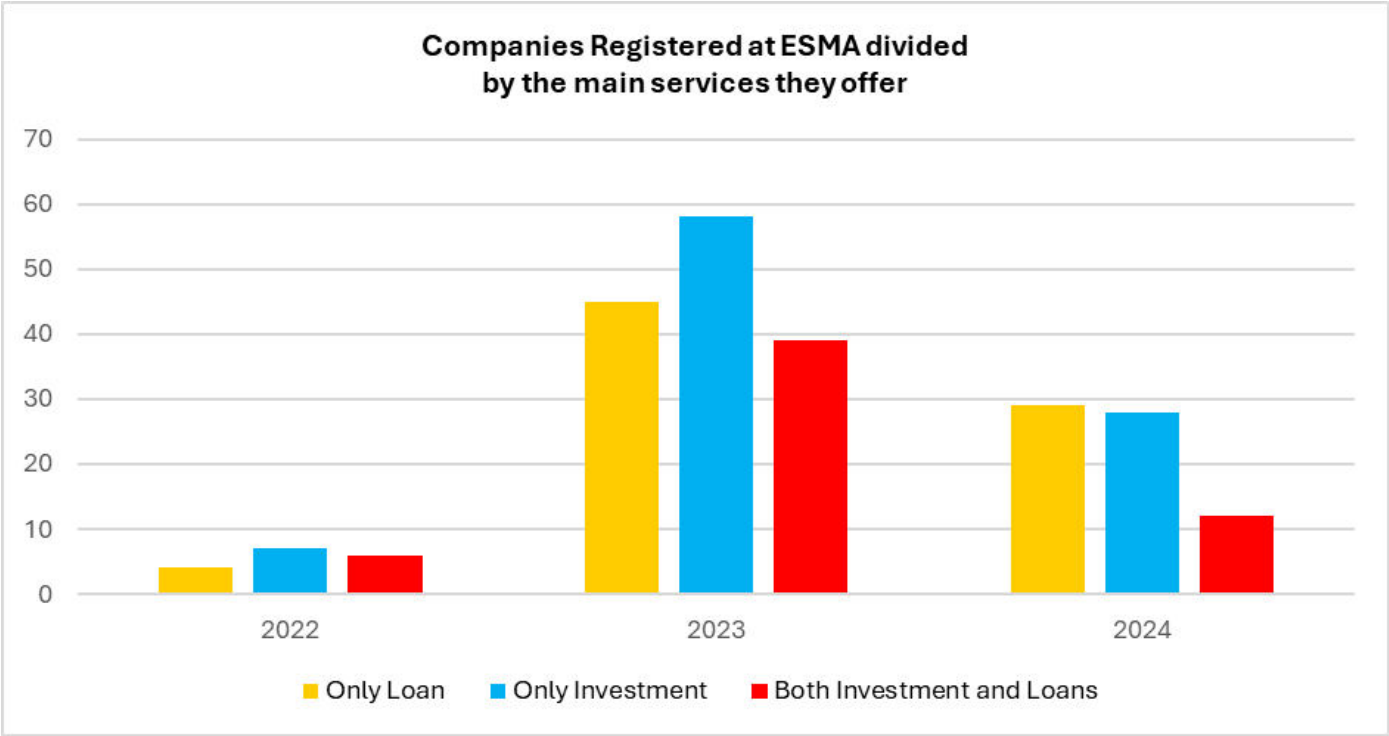
Registrations for Platforms offering only one Service, i.e. Loans or Investments, and those that mix services.

Figure 3



Source: Eurocrowd.org

Figure 4



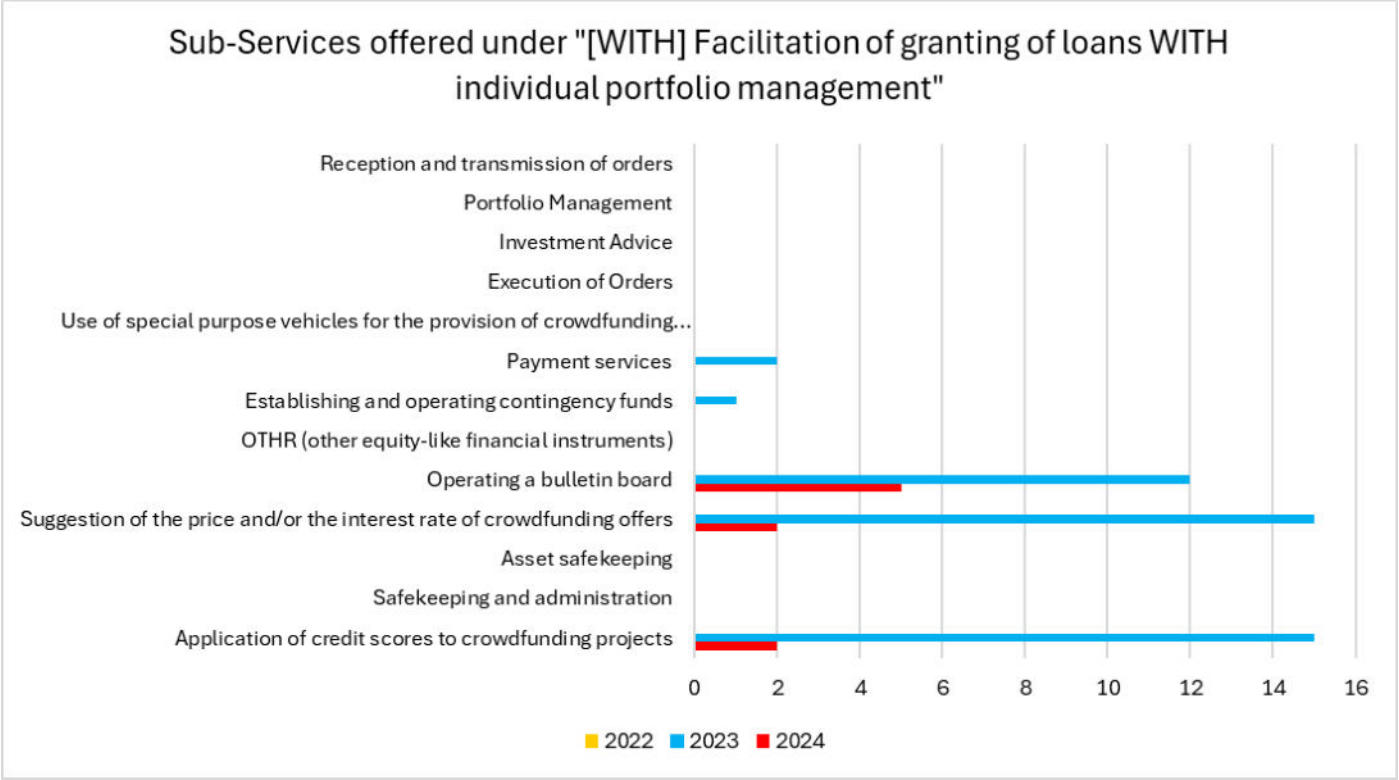
Source: Eurocrowd.org

In the following, we show a number of Figures relating to the subservices offered by CSPs using the three different main license categories.

Figure 5 shows how CSPs with the main license “[WITH] Facilitation of granting of loans WITH individual portfolio management of loans and its Additional Services”, i.e. loan based crowdfunding with the CSP acting with the rights to

allocate funds on behalf of the investors, is related to the loan-based crowdfunding with an active portfolio management, in which investors indicate a risk band and the CSP manages the fund allocation to relevant SME.

Figure 5

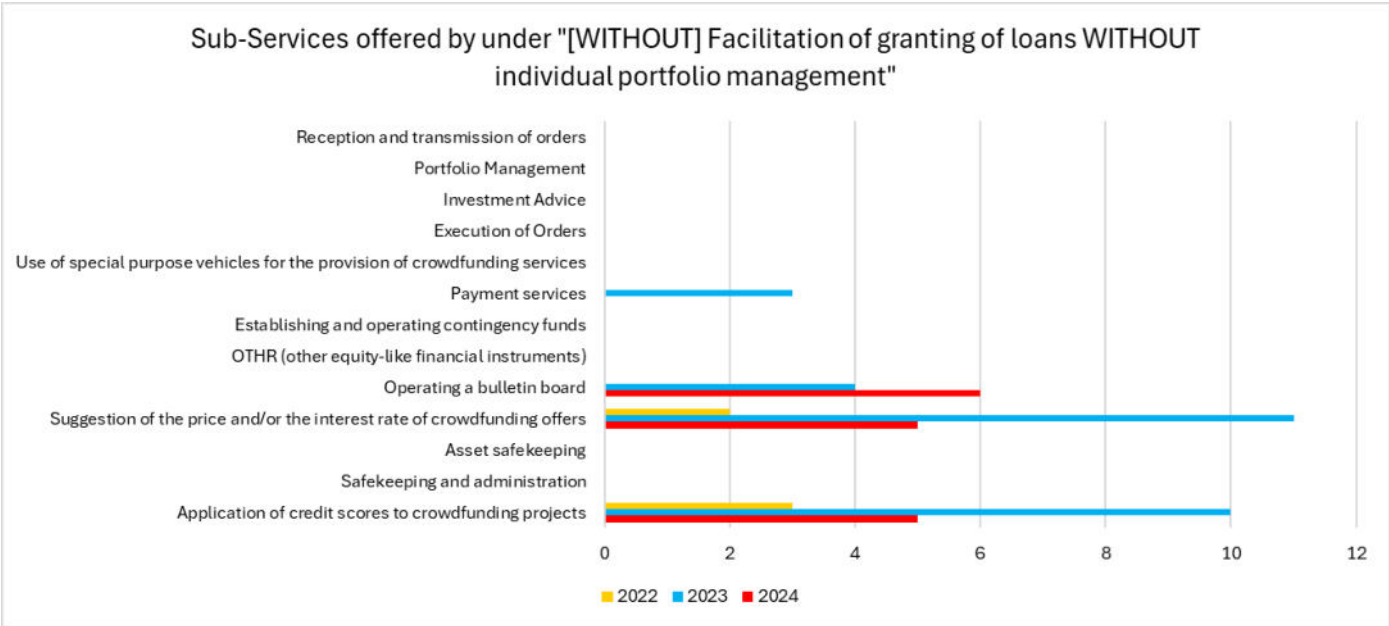


Source: Eurocrowd.org

For loan-based crowdfunding without an active portfolio management, Figure 6 is indicating “[WITHOUT] Facilitation of granting of loans WITHOUT individual

portfolio management of loans and its Additional Services”, i.e. loan-based crowdfunding, outlines the subservices within the segment.

Figure 6

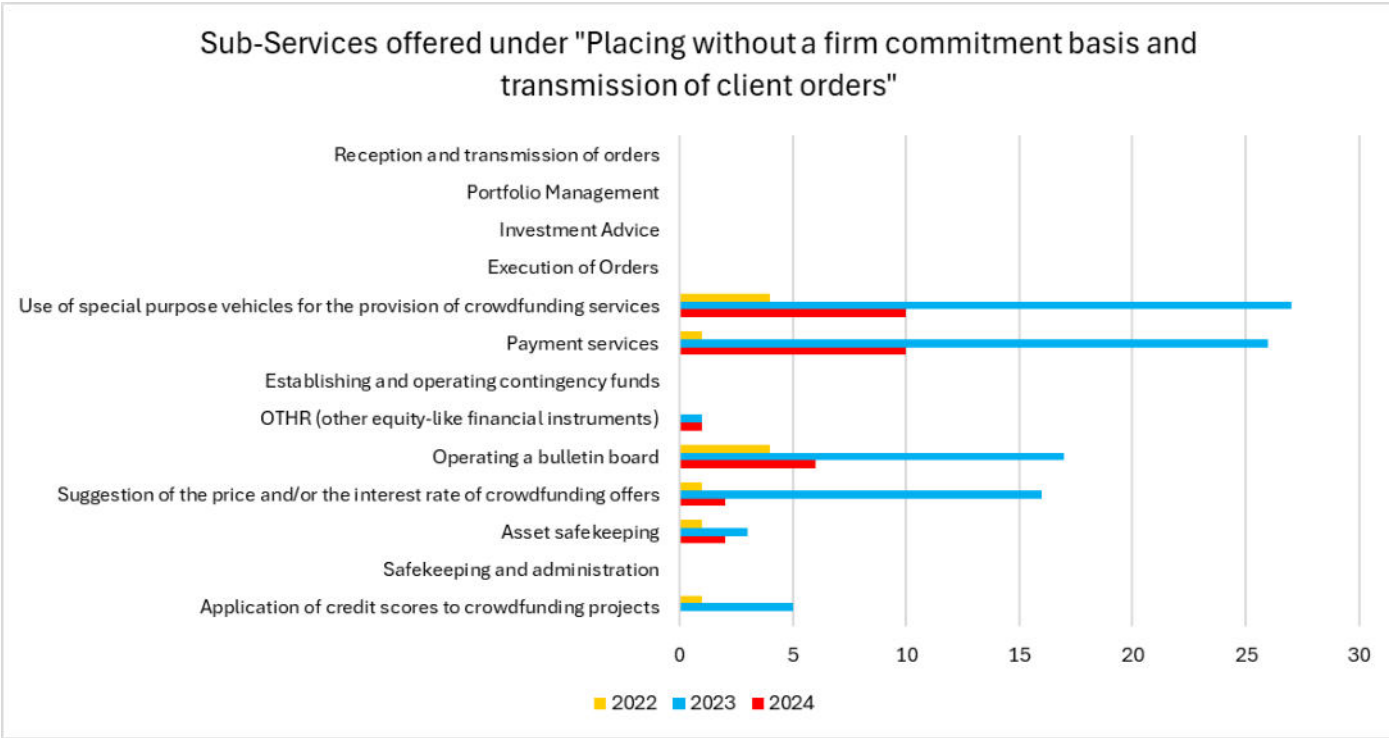


Source: Eurocrowd.org

In Figure 7 “Placing without a firm commitment basis and transmission of client orders and its Additional Services”, i.e. investment crowdfunding, we have the services supported by the equity-based crowdfunding main service.

The mostly used additional service is the operating a bulletin board, followed by the use of special purpose vehicles and the payment services.

Figure 7

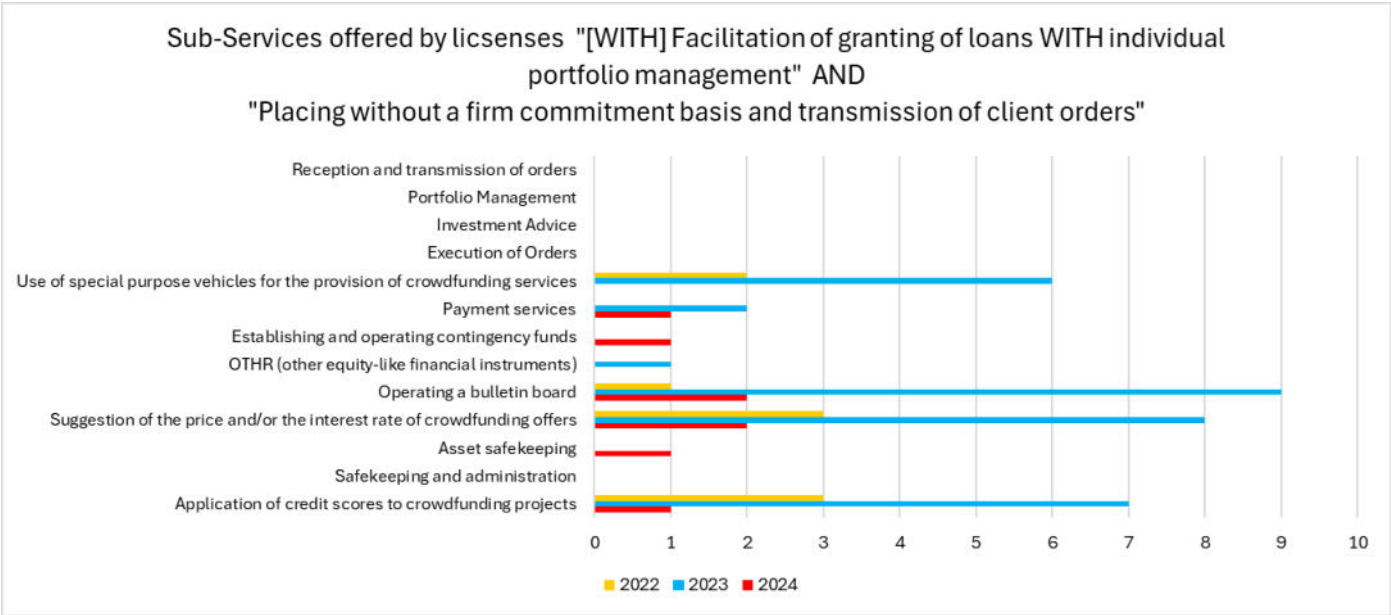


Source: Eurocrowd.org

In Figure 8 we analyse platforms that offer mixed services, both facilitating loans with individual portfolio management and placing investments.

The mix of services results in a wider distribution of registered sub-services with ESMA in order to ensure both types of operations can be executed.

Figure 8

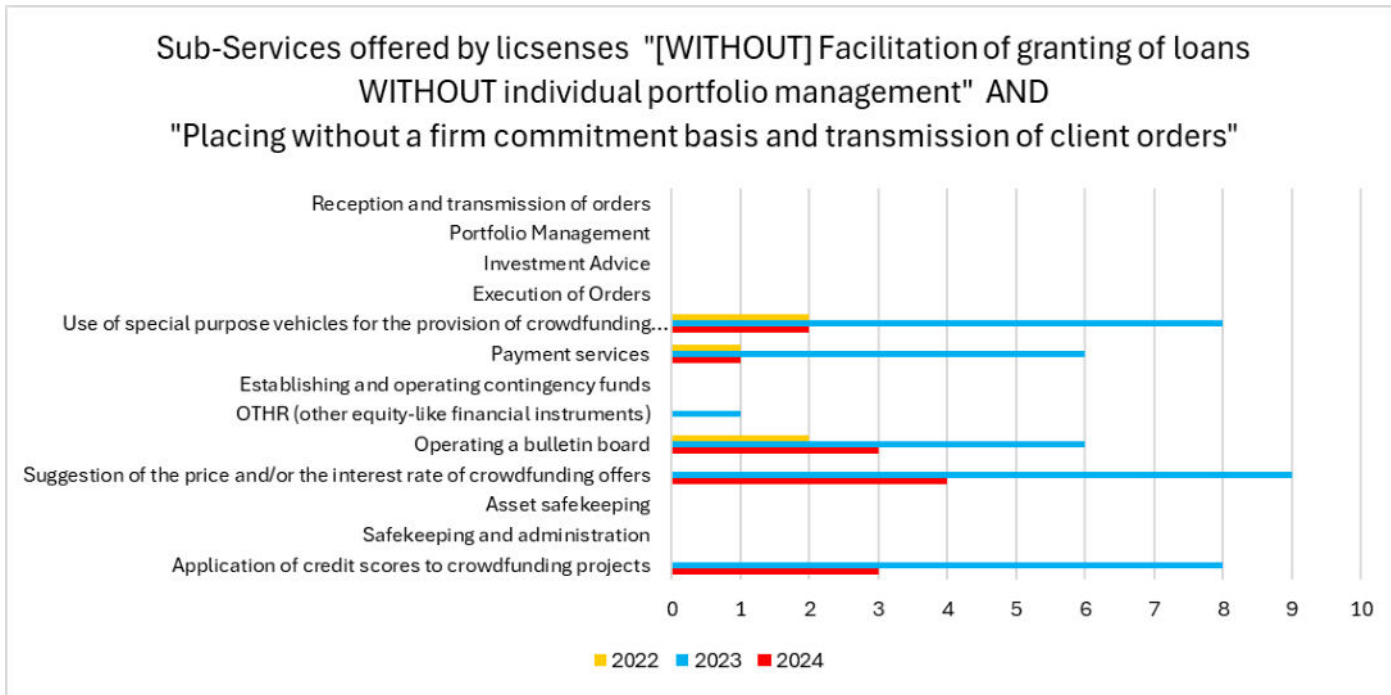


Source: Eurocrowd.org

In Figure 9, on the other hand, we analyse the platforms that offer a mix of loan and investment based services, but without the aspect of individual portfolio management.

The distribution of sub-services is similar to those in Figure 7 for a small subset of platforms in total.

Figure 9



Source: Eurocrowd.org

# Comparison of the Largest Five EU Member States

To better understand market concentration, we analysed the five largest EU economies. We compare the number of CSPs choosing these economies as their home member states, i.e. being supervised by their respective national competent authority, as well as how often they have been chosen as host member states, i.e. how many CSPs with licenses in other EU member states have indicated that they want to do operate also in these economies. The five economies in general had the largest crowdfunding markets prior to the introduction of ECSPR.

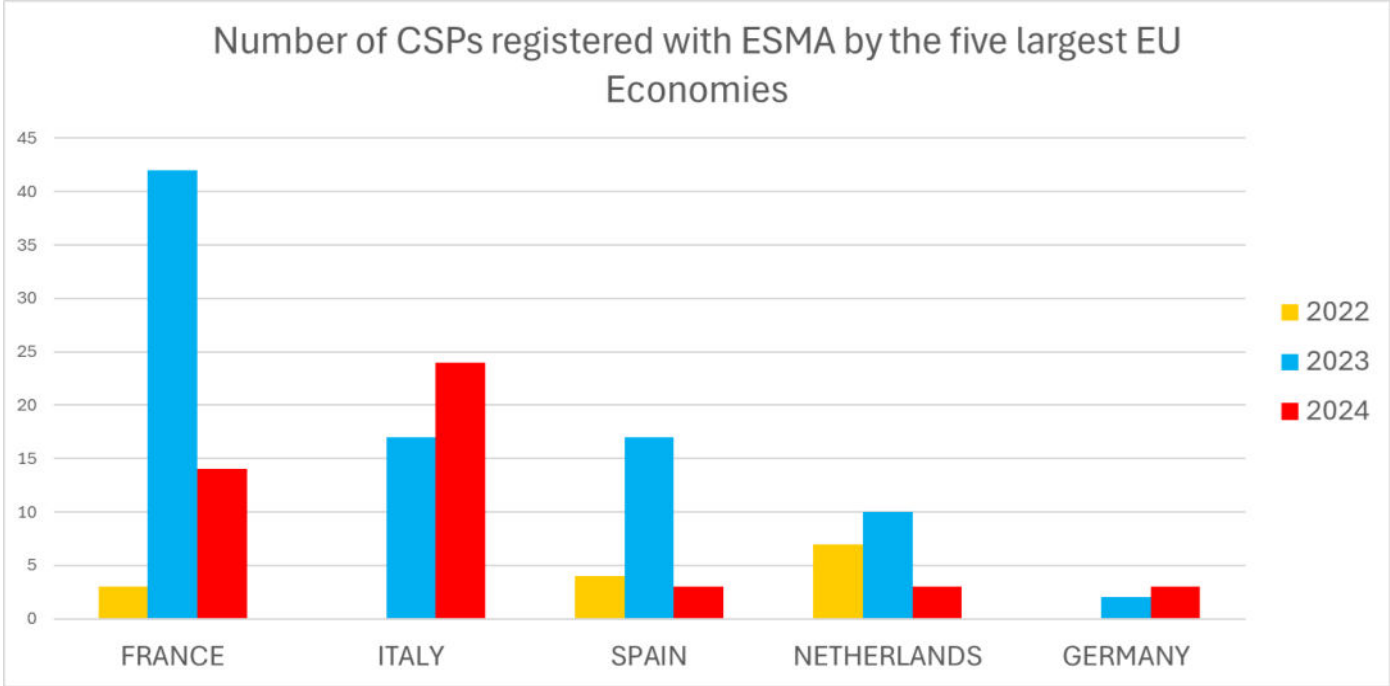
When looking at the home member states, see Figure 10 , “Number of CSPs registered with ESMA by the five largest EU Economies”, confirms France as the leading jurisdiction in CSP licensing, followed by Italy, Spain, and the Netherlands. We believe a large amount of this initial licensing is driven by incumbent players seeking ECSPR licenses in their existing home market, and less an indicator of business friendliness in these markets.

While in Italy and Portugal the implementation was delayed by national policy makers—visible in the uptake of ECSPR in Italy in Figure 10 only as of 2023—Germany, however, stands as an outlier. Despite successfully transitioning ECSPR into national law, it failed to close a legal loophole allowing platforms to continue operating outside ECSPR’s investor protection and prudential requirements.

As a result, most German platforms remained within the old regime, avoiding ECSPR’s significant compliance costs. These dynamics shape the EU crowdfunding landscape and highlight the importance of regulatory alignment for investor protection and market growth.

When we were looking at CSPs active in the five largest EU Economies, a similar distribution appears with host markets for cross-border activity, indicating these countries’ attractiveness for investment and fundraising – and be it just based on the size of the pre-existing market activity.

Figure 10



Source: Eurocrowd.org

## Home vs. Host Member States

A key feature of ECSPR is its automatic passporting system, allowing CSPs licensed in one EU country (home member state) to extend services to others (host member states) without additional applications – all that is needed is the notification of the host member state and the diligent application of local marketing and consumer protection laws. This mechanism was designed to enable investors and businesses in smaller or underserved markets to access ECSPR-compliant crowdfunding opportunities.

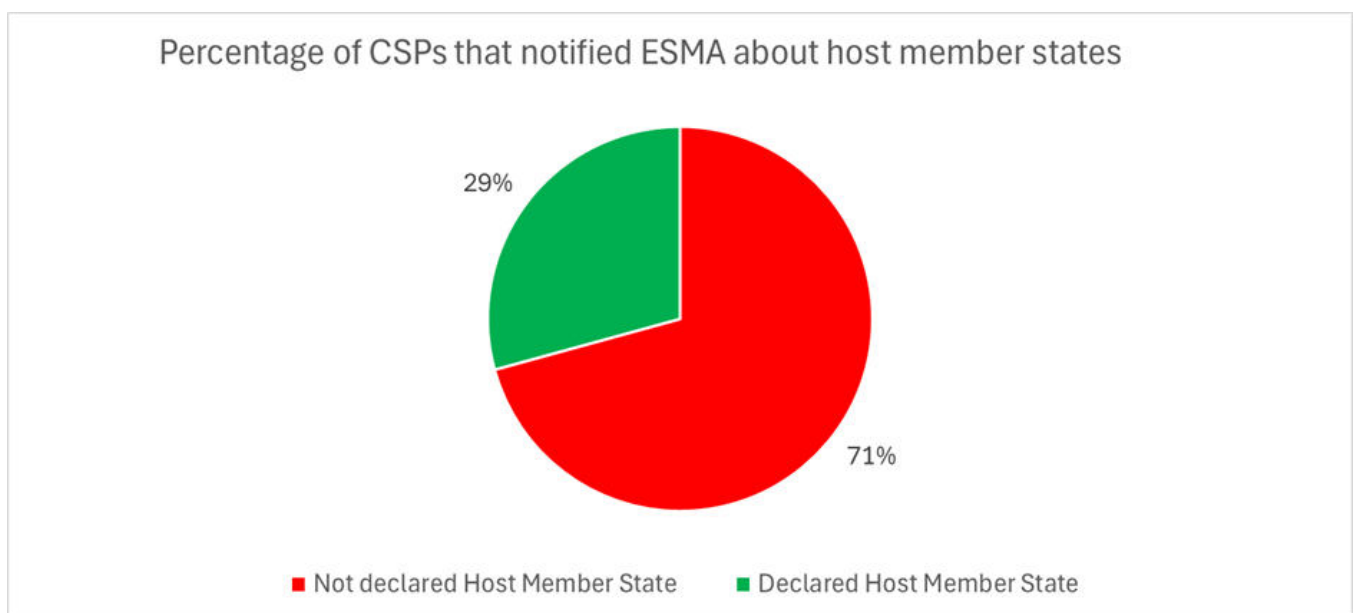
We can identify the impact of cross border licensing in most of the five economies. Among the five largest economies, some jurisdictions have emerged as preferred home markets due to regulatory efficiency and market demand, while others attract CSPs as host markets for investment opportunities.

By further exploring CSPs ambitions in expanding across border, we also reviewed their websites, indicating discrepancy between the ESMA Database and CSPs public communication.

We find a majority of CSPs does not communicate their licensed markets on their websites. Others create confusion by suggesting operating markets that they are not licensed for according to ESMA. At the time of review, CSPs from France, Italy Belgium, Romania, Spain and Ireland were concerned.

Despite the cross border potential, our analysis shows that more than 70% of platforms operate solely within their home member state, Figure 11.

Figure 11



Source: [Eurocrowd.org](https://eurocrowd.org)

# Inactive or Dead URLs in the ESMA Register

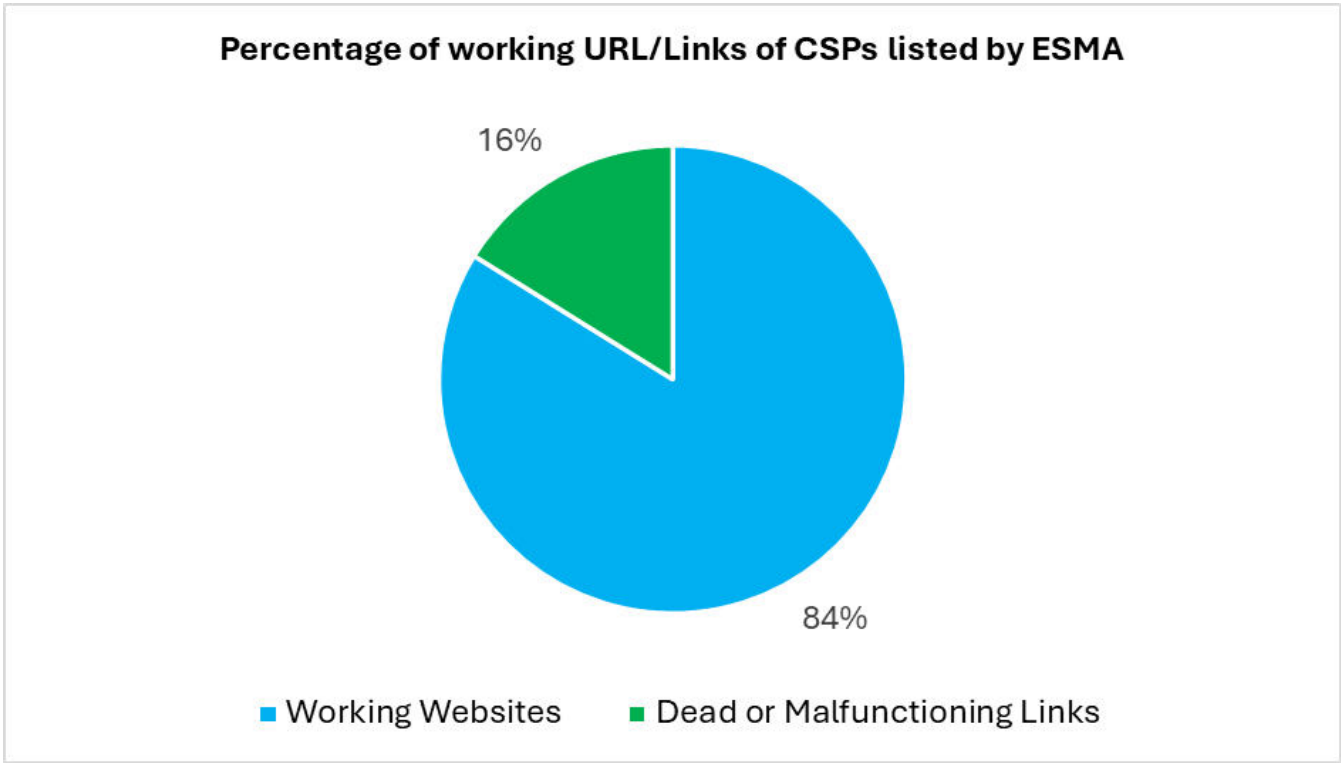
To assess data quality, we reviewed the URLs that CSP license holders reported to their NCAs as their official crowdfunding websites. Surprisingly, 16% of links in the ESMA register were inactive or non-functional, raising concerns about data accuracy, platform viability, and regulatory oversight.

The presence of non-functional URLs suggests that some CSPs may have ceased operations, rebranded, or failed to maintain their online presence.

This highlights the need for regular updates to the ESMA register to ensure investors and issuers can rely on its information when assessing crowdfunding opportunities. Both NCAs and ESMA are responsible for maintaining the accuracy of the register.

We also identified other inconsistencies within the data, which were resolved following quick action by the relevant NCA. While occasional errors are inevitable, we recommend that ESMA conduct periodic quality checks to ensure data integrity. Dead or malfunctioning links in the ESMA database relat to CSPs based in Italy, Spain and the Czech Republic.

Figure 12



Source: Eurocrowd.org

# CONCLUSION

Without regulatory alignment, the market risks stagnation, reduced investor trust, and limited access to funding for SMEs. The evolution of ECSPR licensing across the EU reflects the complexities of harmonizing a fragmented crowdfunding landscape under a single regulatory framework, requiring CSPs to continuously adapting to evolving regulatory requirements, investor expectations, and competitive pressures.

While France, Italy, Spain, and the Netherlands have emerged as leading markets for CSP licensing, Germany's difficulties in adapting a professional crowdfunding market underscores the tension between national regulatory preferences and ECSPR's investor protection goals. Additionally, the diverse service offerings and legal structures chosen by platforms indicate a maturing market where competition is steadily increasing, while it might be too early to judge still low cross-border activity.

Looking ahead, the continued refinement of regulatory frameworks, improved data reporting, and stronger enforcement mechanisms will be critical in fostering a more transparent and efficient crowdfunding ecosystem in the EU. As the sector grows, detailed analysis will be necessary to assess the long-term impact of ECSPR on platform sustainability, investor participation, and cross-border funding activity.

The ESMA register provides valuable insights into market trends, yet discrepancies in data accuracy and platform transparency highlight ongoing challenges in regulatory enforcement and investor protection. Not only CSPs are required to be more active, also NCA and ESMA must seek fast and efficient regulatory convergence .



# RECOMMENDATIONS FOR NCA

## Improve ECSPR Implementation

### Enhance Transparency in Licensing Registers

- Ensure that ESMA's register is regularly updated with accurate and complete information on authorized platforms, including cross-border activities.
- Improve coordination with other NCAs to verify that passported services are correctly listed and aligned across jurisdictions.

### Standardize Cross-Border Licensing Procedures

- Establish clearer guidelines on how platforms should report and update their cross-border operations to reduce inconsistencies.
- Facilitate communication between NCAs to ensure uniform interpretation and enforcement of ECSPR provisions.

### Improve Clarity on Regulatory Approaches

- Where alternative regulatory frameworks exist (e.g., platforms operating under MiFID instead of ECSPR), provide explicit guidance on how these frameworks interact.
- Communicate clearly to platforms when additional national rules apply beyond ECSPR requirements to prevent regulatory uncertainty.

## Ensure Publicly Available Information Is Consistent

- Regularly audit and update official registers to avoid mismatches between ESMA's database and national records.
- Encourage platforms to publicly disclose their licensing status in a standardized format to improve investor transparency.

## Proactively Address Licensing Delays

- Identify bottlenecks in the licensing process and provide clearer timelines to applicants.
- Offer interim solutions for platforms facing regulatory uncertainty due to prolonged authorization procedures.

NCAs can contribute to a more harmonized, transparent, and efficient regulatory environment for crowdfunding under ECSPR.

# RECOMMENDATIONS FOR CSP

## Improve Compliance Under ECSPR

### Ensure Transparency in Licensing Information

- Regularly verify that their ECSPR authorization details, as listed on ESMA's register, match the services they provide.
- Clearly indicate their legal status and the scope of their authorization on their own websites to avoid misleading investors.

### Clarify and Document Cross-Border Activities

- Properly declare and update their cross-border passporting activities to avoid discrepancies in ESMA's records.
- Maintain open communication with national competent authorities (NCAs) to ensure accurate reporting of operations in different member states.

### Improve Consistency in Public Disclosures

- Ensure that publicly available documents—such as investor information, terms of service, and platform disclosures—align with the latest ECSPR requirements and licensing status.
- Periodically review and update platform documentation to reflect any regulatory changes or operational

adjustments.

### Address Licensing Gaps and Legal Uncertainties

- If operating in jurisdictions where regulatory inconsistencies exist, proactively seek clarification from NCAs on applicable rules.
- Avoid operating under ambiguous legal frameworks that could expose the platform to compliance risks in the future.

### Monitor Market Evolution and Regulatory Updates

- Stay informed about changes in ECSPR implementation across different EU countries, especially where licensing delays or alternative legal structures exist.
- Adapt business models in response to how regulators and platforms interpret ECSPR's provisions, ensuring long-term compliance.

By proactively addressing these compliance areas, crowdfunding platforms can strengthen their regulatory standing, improve investor trust, and enhance their market position under ECSPR.

## **ECSPR Licensing**

Insights from the public ESMA Register of  
Crowdfunding Service Providers -  
2022-2024

APRIL, 2025

[www.eurocrowd.org](http://www.eurocrowd.org)

