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User Guide to the new CASP cross-border manual

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Crypto finally gets a regulated lane - but not a corporate one

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First CASP Cross-Border Manual

FinSurv's new draft Manual is the first Manual for **Authorised Crypto Asset Service Providers** to be read with the draft Capital Flow Management Regulations, 2026. Both instruments remain subject to refinement and public comments close on 30 September 2026.

Where the border now sits

Under the draft Manual, buying or selling crypto for Rand through a domestic Authorised CASP is domestic. Transfers between domestic Authorised CASPs are also domestic.

The capital-flow border is crossed when crypto moves between a domestic Authorised CASP and an offshore CASP or when a domestic Authorised CASP sends crypto to a non-custodial wallet. This event becomes reportable to FinSurv as an inward or outward flow. The blockchain may settle globally and continuously but the Manual selects the regulated gateway at which South Africa records an import or export of capital.

How Authorised CASP categories compare with ADLAs

Authorised CASP II most closely compares with ADLA II. Both provide a regulated pathway for specified cross-border transactions by resident individuals under the R2 million single discretionary allowance. The principal difference is the infrastructure: an ADLA II uses conventional foreign-exchange and external MTO arrangements whereas a CASP II uses custodial wallets and regulated crypto-asset transfers. They are therefore functionally comparable but not equivalent.

CASP I compares with ADLA III only in relation to low-value person-to-person remittances. Both apply the R5 000 daily transaction and R25 000 monthly customer limits. The customer pays or receives Rand, while the provider uses either conventional remittance infrastructure or crypto assets as the underlying settlement rail.

CASP III is broadly comparable with ADLA IV because each combines the permissions of the preceding categories and may include specifically approved additional services. Again, the comparison is structural rather than exact.

Category	What it may do	Customer and value boundary	Closest ADLA comparison
Authorised CASP I	Person-to-person remittances using crypto only as the net settlement medium. The client pays or receives Rand and never owns the crypto.	R5 000 per transaction per day and R25 000 per applicant per month. Resident gifts, migrant-labour remittances and qualifying contract-worker remittances.	ADLA Category III, but only as a low-value P2P remittance comparator.
Authorised CASP II	South African custodial wallets and specified cross-border crypto transfers.	Resident individuals may use the R2 million SDA and up to R10 million under the FCA with tax approval. Resident entities may hold and trade domestically but may not import or export capital in crypto.	ADLA Category II is the closest structural and functional comparison.
Authorised CASP III	A combination of Categories One and Two, together with other specifically approved crypto products or services.	The same underlying transaction permissions apply unless FinSurv grants additional specific approval.	ADLA Category IV, although not equivalent in scope or capital treatment.

Authorised CASP versus an ordinary local CASP

An Authorised CASP is not "*superior*" to a FSCA-licensed CASP for every purpose. It has an additional FinSurv appointment for the cross-border activities described in the Manual.

A local CASP licensed under FAIS and registered with the FIC may continue providing domestic crypto services within its existing permissions. It may not, however, present itself as a regulated gateway for cross-border crypto flows after the proposed framework takes effect unless FinSurv appoints it as an Authorised CASP.

The draft Manual further allows an Authorised CASP to provide products with an approved third-party pay-in partner, pay-out partner, remittance platform or other service provider. In this structure, the Authorised CASP must remain the principal, retain full accountability, integrate the partner's systems and ensure that the relevant information is held in South Africa.

The banks do not disappear

The draft does not end the commercial relationship between banks and CASPs. It entrenches it.

An Authorised CASP is obliged to maintain at least two Rand-denominated accounts with an Authorised Dealer so that client money is segregated from operational money. Non-resident fiat must still enter through an Authorised Dealer or a non-resident Rand account. Fiat proceeds may still leave through an Authorised Dealer in permitted cases.

The change concerns the regulatory role performed by each participant. A bank account, off-ramp arrangement or bank's willingness to service a high-value CASP will no longer, by itself, provide the necessary cross-border crypto permission.

The Authorised CASP becomes the FinSurv principal for the crypto movement, while the bank remains the fiat, safeguarding and payment gateway. Existing bank-CASP revenue need not disappear but the source of regulatory authority becomes clearer.

What happens to the institutional stablecoin payout model?

Before the draft Manual, institutional models were engineered around an OTC desk receiving a whitelisted stablecoin transfer, validating it on-chain, converting it at an agreed spot rate and paying Rand through domestic rails. This architecture was technologically elegant: settlement arrived in a corporate sub-wallet > the transaction hash and wallet were screened > conversion occurred off-market and > a payout API sent ZAR to the beneficiary.

The draft Manual recognises almost every component of the above stack > wallet infrastructure > transaction hashes > on-chain movement > pricing > third-party integrations and > domestic payouts <u>but</u> withholds the critical corporate cross-border permission.

Resident entities will be allowed to open domestic custodial wallets and buy or sell crypto locally. They will <u>not</u>, when the Manual becomes law, be allowed to use crypto for an import or export of capital. The media statement is equally explicit: *outward and inward cross-border crypto transfers are not permissible for South African entities*.

Another stark consequence is that CASPs originally built to move institutional value of R500 million per day will be restricted to general remittance permissions of R5 000 per customer per day.

The draft Manual also places much tighter controls around the liquidity and reserve balances that previously supported these models. Some CASPs generated returns on idle stablecoin and crypto balances held between settlement cycles. Whilst the draft does not expressly prohibit yield products, it requires client assets to be segregated from proprietary assets, subjects the acquisition and management of crypto reserves to FinSurv scrutiny and restricts the sourcing of crypto for operational purposes.

Crypto-to-ZAR off-ramping will therefore no longer sit at the edge of the exchange-control system. Where it follows an inward cross-border crypto transfer, the transfer, wallet, transaction hash, customer, purpose and Rand equivalent will be subject to FinSurv reporting and reconciliation. The ZAR conversion itself must occur at the price agreed with the client, with client funds segregated and matched to the specific transaction.

B2B and the gig economy: how do CASPs get back in?

Not through Category One as currently drafted. That category is limited to remittances between individuals.

A company paying freelancers, creators, drivers, suppliers or remote workers remains a corporate originator, even where every beneficiary is a natural person. The transaction does not become P2P merely because the final payment reaches an individual bank account.

The route back into this value chain must therefore be created through a future framework.

Price and operating economics

The draft sets no customer tariff, spread cap or regulated price. It requires purchases and sales to occur at the quoted and agreed price, inclusive of fees, commissions and charges, and requires the price and applicable fees to be displayed.

Capital and compliance layout costs: Authorised CASP versus ADLA III

Cost or control	ADLA Category III	Authorised CASP under the draft
Ring-fenced capital	Fixed at R5 million.	The higher of R5 million or 15% of average positive annual gross income over the preceding three years.
Key FinSurv role	Senior exchange control officer and AML officer, subject to fit-and-proper approval, together with FIC compliance.	Competent capital-flow management officer, subject to FinSurv fit-and-proper approval, together with FIC and FAIS compliance functions.
Reporting build	SARBDEX/BOPCUS reporting, reconciliation and prescribed returns.	New FinSurv Reporting System build, testing and certification, including transaction hashes, wallet identifiers and purpose categories.
Assurance	Audited financial statements, capital confirmation, periodic external-audit commitment and possible regulator-directed audits.	Audited financial statements, capital confirmation, periodic external-audit commitment and possible regulator-directed audits.
Banking	Operational and client-fund banking arrangements.	At least two Rand accounts with an Authorised Dealer to segregate client and operational funds.

Authorised CASPs will no longer be cheaper to establish merely because they settle on-chain. The R5 million entry capital is only the floor. A mature, high-revenue CASP may face a higher variable capital requirement and must fund wallet security, blockchain analytics, Travel Rule messaging, FinSurv reporting, reconciliations, external assurance and a dedicated capital-flow compliance function.

A draft Inspection Manual will follow shortly, under which Authorised CASPs will be required to develop a comprehensive reporting and reconciliation system capable of integrating with SARBDEX, the Reserve Bank's Reporting System, for straight-through reporting on at least a T+5 basis. This would represent a further material cost component in that Authorised CASPs like ADLAs will appoint skilled compliance staff to fulfill these technical and reporting requirements of SARB

Has the Travel Rule changed?

No. The draft Manual does not amend FIC Directive 9 of 2024.

The Travel Rule remains an AML/CFT information-transfer obligation applying to qualifying domestic and cross-border crypto transfers. The new Manual adds a separate capital-flow classification and FinSurv reporting layer.

The draft Manual requires > client and beneficiary details > the transaction hash > originator and beneficiary wallet identifiers > the crypto amount > Rand equivalent and purpose category. The above flows sets the stage for a single capture event (also known as straight-through-reporting) and an interoperable reporting architecture.

There is, however, a terminology mismatch worth noting. Directive 9 uses 'unhosted wallet', while the draft Manual uses 'non-custodial wallet'. The concepts are aligned, but they should be expressly mapped.

More importantly, the draft allows certain individual outward transfers to non-custodial wallets while treating some inward transfers originating from those wallets as impermissible. This asymmetry requires a clear policy rationale and a risk-based pathway for verifying wallet ownership and provenance.

The larger policy choice

SARB is right to bring cross-border crypto activity within an accountable and reportable framework. The draft replaces ambiguity with named gatekeepers, transactional data and enforceable responsibility.

The unresolved question is whether South Africa will regulate only the personal-investment and low-value remittance edges of blockchain or whether it will also accommodate the institutional payment use cases already reshaping global treasury.

If entities remain prohibited, the framework will supervise the on-ramp while leaving the largest commercial prize namely B2B and platform settlement outside the regulated lane.

MDB Law response to FinSurv

MDB Law is consolidating operational evidence from CASPs, OTC desks, payment platforms, ADLAs and banking partners into a coordinated response before the 30 September deadline.

Publication note and primary sources

This article is a fintech legal analysis of consultation drafts and does not constitute legal advice. The draft Manual and draft Capital Flow Management Regulations are not yet operative and may change following public comment. Information is stated as at 4 August 2026.

National Treasury and SARB, Media Statement: Draft Crypto Asset Manual for Cross-Border Activities (3 August 2026).

Draft Crypto Asset Manual for Cross-Border Activities (consultation draft dated 31 July 2026).

SARB, Currency and Exchanges Manual for Authorised Dealers.

SARB, Currency and Exchanges Manual for Authorised Dealers in Foreign Exchange with Limited Authority.

FIC Directive 9 of 2024: Travel Rule Relating to Crypto Asset Transfers.

White House fact sheet: GENIUS Act Signed into Law (18 July 2025).