## October 7, 2021

The Honorable Nancy Pelosi Speaker of the House United States House of Representatives H-232 The Capitol Washington, DC 20515

The Honorable Kevin McCarthy Republican Leader United States House of Representatives H-204 The Capitol Washington, DC 20515 The Honorable Chuck Schumer Majority Leader United States Senate 322 Hart Senate Office Building Washington, DC 20510

The Honorable Mitch McConnell Minority Leader United States Senate 317 Russell Senate Office Building Washington, DC 20510

Dear Majority Leader Schumer, Speaker Pelosi, Minority Leaders McConnell and McCarthy,

As Congressional leadership thinks through changes in the regulatory landscape for crypto, an important part that is often left out are the real negative climate and environmental justice effects, which merit close attention by policymakers. We, the more that 65 climate, economic, racial justice, business and local organizations write to you today to urge Congress to take steps to mitigate the considerable contribution portions of the cryptocurrency markets are making to climate change and the resulting greenhouse gas (GHG) emissions, environmental, and climate justice impacts it will have.

In 2018, scientists writing in *Nature* warned that Bitcoin's growth alone could <u>single-handedly</u> push global emissions above 2 degrees Celsius within less than three decades. The University of Cambridge Judge Business School's Bitcoin Electricity Consumption Index <u>estimated</u> in May (when Bitcoin was at its peak) that Bitcoin mining will consume more than 129 terawatt-hours of electricity globally this year — more energy <u>than Argentina</u> or Norway. With the market off its May peak, Bitcoin mining is estimated to consume some 91 terawatt-hours of electricity annually — <u>more than Finland</u>, a nation of approximately 5.5 million. The Digiconomist's Ethereum Energy Consumption Index estimates that the Ethereum blockchain will consume <u>71 terawatt-hours this year</u>, nearly the same as the energy consumption in 2020. History indicates that this problem will only get worse over time, as Bitcoin's energy consumption increased almost 62-fold from 2015 and March of 2021. The GHG emissions from this exorbitant and unnecessary energy consumption is staggering.

Meanwhile, research shows that Bitcoin mining produces 30,700 tonnes of electronic waste (e-waste) annually, comparable to the e-waste of the Netherlands. The minerals often present in e-waste are limited resources and aren't easily recyclable using today's technology (only <u>17.4</u> <u>percent</u> of 2019's e-waste was collected and recycled).

The reason for this considerable GHG and e-waste footprint is rooted in the deeply energy intensive "Proof of Work" process used by the two largest cryptocurrencies, Bitcoin and Ethereum. With Proof of Work cryptocurrencies, miners compete to validate transactions on their blockchains. In the case of Bitcoin, about every ten minutes, the first miner to correctly identify a 64-digit hexadecimal number associated with the new block receives 6.25 Bitcoins as a reward -- and to do so requires massive computing capacity. Since the Bitcoin network increases the difficulty of this guessing game as more miners participate, miners need sophisticated data centers running highly specialized machines, combined with cooling systems to prevent overheating. Increased demand for these machines are <u>exacerbating a global</u> shortage of semiconductors. A bipartisan bill by Senator Maggie Hassan and Joni Ernst has called for a report on how cryptocurrency mining operations are impacting semiconductor supply chains.

The energy usage on the Ethereum blockchain has gotten more intense due to a surge of interest in Non-Fungible Tokens (NFTs)<sup>1</sup>: in August, the NFT marketplace OpenSea alone recorded <u>\$3.4 billion worth of transactions</u>. Well before the latest surge of NFT volumes, its climate impact was already the <u>focus of some controversy</u>. While there is a plan to migrate the Ethereum blockchain to Proof of Stake<sup>2</sup>, which is far less energy intensive, it is unclear when, if ever, this change will occur.<sup>3</sup>

Cryptocurrency mining is also already having a detrimental impact on local environments. Research has estimated that this and other cryptocurrency mining operations in upstate New York have increased residents' electric bills by about <u>\$165 million for small businesses and \$79</u> <u>million</u> for individuals. In Seneca Lake, New York, the private equity firm Atlas Holdings has been utilizing a natural gas plant owned and operated by Greenidge Generation LLC to mine Bitcoin, leading to <u>protests</u> and a <u>lawsuit</u> by residents, due to alleged violations of state laws and the risks to Seneca Lake. Residents of Limestone and Jonesborough, Tennessee are also experiencing noise pollution and <u>quality of life issues</u> that are <u>impacting property values</u>, due to the noise from local cryptocurrency mining operations.

Following a crackdown on cryptocurrency miners in China, many miners are moving to Texas, due to its deregulated grid, taking away the power that Texans need. Many cryptocurrency miners were already there, like <u>Whinstone Inc</u> (owned by the publicly traded Riot Blockchain),

<sup>1</sup> OpenSea defines NFTs as "unique, digital items with blockchain-managed ownership". https://support.opensea.io/hc/en-us/articles/360063450733-What-is-a-Non-Fungible-Token-NFT-

<sup>2</sup> Proof of Stake is a blockchain validation system which limits validators to those who have 32 or more ETH. As noted by the Ethereum Foundation, "Unlike proof-of-work, validators don't need to use significant amounts of computational power because they're selected at random and aren't competing. They don't need to mine blocks; they just need to create blocks when chosen and validate proposed blocks when they're not." <u>https://ethereum.org/en/developers/docs/consensus-mechanisms/pos/</u>

<sup>3</sup> Migrating from Proof of Work cryptocurrency mining to proof of stake cryptocurrency mining decreases the energy consumption and GHG emissions from mining nearly 99 percent. *See, e.g.*, <u>https://www.nbcnews.com/tech/tech-news/cryptocurrency-goes-green-proof-stake-offer-solution-energy-concerns-rcna1030; https://blog.ethereum.org/2021/05/18/country-power-no-more/.</u>

the largest North American miner. Whinstone is expanding in Texas and will require an <u>estimated 750 megawatts</u> of power once its expansion is done -- enough to power over 150,000 Texas homes at peak demand. Adding more energy-guzzling crypto mining operations to Texas could exacerbate the sorts of blackouts the state already saw during the <u>extreme cold in</u> <u>February</u>; outages that <u>reporting</u> shows hit communities of color the hardest. The extreme temperatures behind the blackouts are themselves another consequence of the climate crisis.

Other power plants across the country are repowering to mine Bitcoin as well. Stronghold Digital Mining has purchased and begun mining at <u>three coal waste plants</u> in Pennsylvania, while Marathon Digital is <u>partnering with once-struggling coal-fired plants</u> in Montana.

As the crypto markets expand, so does the sophistication of financial products that enable crypto miners to manage their risks, even with extreme price volatility. For example, crypto trading firms like Genesis Trading (a part of the crypto conglomerate the Digital Currency Group) have created bespoke products for crypto miners. These financial products will likely enable the marketplace to grow and withstand periods of volatility, making cryptocurrency mining more viable, despite the climate impact.

As Congress contemplates legislation for cryptocurrencies, we urge you to consider the impacts that Proof of Work mining is having on the climate, clean water, and environmental justice. As you explore legislative and regulatory responses to ensure investor protection in the industry, it is critical that you also consider the financial stability risks that climate change presents -- and how Proof of Work mining is exacerbating those risks.

Sincerely,

## National and International organizations:

350.org Action Center on Race and the Economy Americans for Financial Reform Anthropocene Alliance Aytzim: Ecological Judaism **Businesses for a Livable Climate** CatholicNetwork US **Clean Energy Action** Climate Finance Action **Climate Hawks Vote** CODEPINK Council on Intelligent Energy & Conservation Policy (CIECP) Earth Action, Inc. EcoEquity **Evergreen** Action Food & Water Watch

Friends of the Earth US Future Coalition Haiti Cholera Research Funding Foundation Inc.. USA Institute for Agriculture and Trade Policy Institute for Policy Studies Climate Policy Program International Indigenous Youth Council Los Angeles Chapter National Community Reinvestment Coalition North American Climate, Conservation and Environment(NACCE) NYC Grassroots Alliance Oil Change International Progressive Democrats of America Public Citizen RapidShift Network **Revolving Door Project** Sierra Club Small Business Alliance Sunrise Project System Change Not Climate Change The Climate Mobilization Vegan Flag Zero Hour

## State and Local organizations:

Alliance for a Green Economy California Businesses for a Livable Climate Call to Action Colorado Citizens' Climate Lobby-Rochester Coastal Research and Education Society of Long Island Colorado Businesses for a Livable Climate Committee to Preserve the Finger Lakes Denizens of the Biosphere Empower our Future - Colorado Extinction Rebellion San Francisco Bay Area I-70+ Vasquez Boulevard Superfund Community Action Group Local Progress NY Long Island Progressive Coalition Mid-Missouri Peaceworks Montbello Neighborhood Improvement Association Nassau Hiking & Outdoor Club New Mexico Climate Justice North Range Concerned Citizens Occupy Bergen County (New Jersey) SanDiego350

Seneca Lake Guardian, a Waterkeeper Alliance Affiliate South Shore Audubon Society Spirit of the Sun Syracuse Peace Council Texas Campaign for the Environment The Green House Connection Center Unite North Metro Denver Wall of Women 350 Butte County 350 Everett 350 Tacoma 350Brooklyn 350NYC 350PDX

CC:

The Honorable Rostin Behnam Acting Chair U.S. Commodity Futures Trading Commission 1155 21st Street, N.W. Washington, D.C. 20581

The Honorable Gary Gensler Chair Securities and Exchange Commission 100 F St NE Washington, DC 20002

The Honorable Michael J. Hsu Acting Comptroller Office of the Comptroller of the Currency 400 7th Street SW Washington, DC 20219

The Honorable Jelena McWilliams Chair Federal Deposit Insurance Corporation 11776 F. Street N.W. Washington, DC 20006

The Honorable Jerome Powell Chair Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue N.W. Washington, DC 20551

The Honorable Michael S. Regan Administrator U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460

The Honorable Dr. Janet L. Yellen Secretary U.S. Department of the Treasury 1500 Pennsylvania Avenue, N.W. Washington, D.C. 20220