Tether (USDT)

Mandatory information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism, published under Article 66(5) of Regulation (EU) 2023/1114 (MiCA) and Commission Delegated Regulation (EU) 2025/422. This is not a MICA-licensed asset and therefore it is only available for non-EU clients.

Mandatory information

- V2.0 Last updated on: 20th October 2026
- Whitepaper link: https://tether.to/en/whitepaper/

Code	Field	Content	Source
S.1	Name	Payhound Limited	
S.2	Relevant legal entity identifier	9845001DD90AF543DC90	
S.3	Name of the crypto-asset	Tether (USDT)	
S.4	Consensus mechanism	Not applicable at token level: USDT relies on the consensus of its host networks. This disclosure covers the four networks for which open 2025 USDT transaction data exists. Tron uses Delegated Proof-of-Stake with 27 elected Super Representatives. Ethereum uses Proof-of-Stake. Avalanche C-Chain uses Proof-of-Stake. USDT on the Omni Layer is recorded in Bitcoin transactions, secured by Bitcoin's Proof-of-Work.	R1, R2, R3, R6, R9

Code	Field	Content	Source
S.5	Incentive mechanisms and applicable fees	Each network has its own validator incentives and charges its own transaction fees in its native asset: Bandwidth and Energy (TRX) on Tron, gas (ETH) on Ethereum, gas (AVAX) on Avalanche and BTC fees on Bitcoin. USDT transfers carry no protocol-level fee of their own.	R2, R3, R6, R9
S.6	Beginning of the period to which the disclosure relates	2025-01-01	—
S.7	End of the period to which the disclosure relates	2025-12-31	—
S.8	Energy consumption (kWh per year)	5,356,376 (breakdown by network below)	R1–R11
S.9	Energy consumption sources and methodologies	For each network, the 2025 count of USDT transactions (Coin Metrics TxCnt) is multiplied by that network's energy per transaction. The per-transaction figures are: Tron 0.0000273 kWh (bottom-up estimate of 27 Super Representatives and their standby nodes, 88,249 kWh ÷ 3.23 billion transactions); Ethereum 0.0150 kWh (CCAF, 7.87 GWh ÷ 523.9 million transactions);	R1–R11

Code	Field	Content	Source
		Avalanche 0.000142 kWh (as published in Circle's MiCA white paper); Bitcoin 1,236 kWh (CCAF, 190 TWh ÷ 153.7 million transactions). Scope: the four networks above, which held almost all USDT supply at the end of 2025. Other networks (for example Solana and TON) are excluded because no open 2025 USDT transaction data exists for them.	

Supplementary key indicators

Code	Field	Value	How Derived	Source
S.10	Renewable energy consumption (% of total energy used per year)	40.5%	Energy-weighted: the Bitcoin share uses Cambridge's 42.6% renewables share for mining; the other networks use the 2025 global average of 33.8%.	R11, R12, R14
S.11	Energy intensity (kWh per validated transaction)	0.00586	5,356,376 kWh ÷ 913,682,845 USDT transactions in 2025	R1

S.12	Scope 1 DLT GHG emissions – controlled (t CO2eq per year)	0	Neither Tether nor the token operates generation assets	—
S.13	Scope 2 DLT GHG emissions – purchased (t CO2eq per year)	1,419.9	Sum across networks (table above)	R7, R11, R12, R13
S.14	GHG intensity (kg CO2eq per validated transaction)	0.00155	1,419,944 kg ÷ 913,682,845 USDT transactions in 2025	R1

Sources and Methodologies

Code	Field	Content
S.15	Key energy sources and methodologies	USDT transaction counts come from Coin Metrics' open per-chain datasets [R1]. Network energy per transaction comes from the Cambridge Centre for Alternative Finance for Bitcoin [R11] and Ethereum [R7], from a bottom-up hardware model for Tron using TRON's documentation [R4] and the Cloud Carbon Footprint coefficients [R5], and from Circle's published MiCA white paper for Avalanche [R10]. Network transaction totals come from Coin Metrics [R1][R8]. Energy is allocated to USDT by its share of each network's transactions. For Omni, each USDT transaction is itself a Bitcoin transaction, so it carries Bitcoin's average energy per transaction. The renewable share combines Cambridge's mining-mix figure [R14] with Ember's global average [R12]. No offsetting or market-based instruments are applied.
S.16	Key GHG sources and methodologies	Emissions are location-based. For Bitcoin and Ethereum, the network's emissions-to-energy ratio from CCAF is applied [R7][R11]. For Tron and Avalanche, whose node locations are not published, the 2025 global average grid

		intensity of 458 g CO2e/kWh is applied [R12][R13]. All emissions are reported as Scope 2.

References

1. **R1** – Coin Metrics, Community Data: files usdt_trx.csv, usdt_eth.csv, usdt_avaxc.csv and usdt_omni.csv; daily TxCnt summed for 2025 (retrieved 23 September 2026).
2. **R2** – TRON Developer Hub, Consensus and DPoS.
3. **R3** – ethereum.org, Proof-of-stake (PoS).
4. **R4** – TRON Developer Hub, Deploy a node (Super Representative hardware: 32 cores, 64 GB RAM, 3 TB+ SSD).
5. **R5** – Cloud Carbon Footprint, Methodology (Apache License 2.0).
6. **R6** – Avalanche, Builder Hub documentation.
7. **R7** – Cambridge Judge Business School, New report maps Ethereum's climate footprint with new precision, 10 July 2026 (Ethereum 7.87 GWh, 2.37 ktCO2e).
8. **R8** – Coin Metrics, trx.csv, eth.csv and btc.csv; 2025 network transaction totals (3,232,144,958; 523,937,952; 153,685,518).
9. **R9** – Omni Layer, omnilayer.org.
10. **R10** – Circle Internet Financial Europe SAS, MiCA EURC White Paper, Part G, S.11 (Avalanche: 0.0001420059 kWh per transaction).
11. **R11** – TheEnergyMag, Bitcoin Power Use Jumps 38% with Greener Energy Mix: Report, 25 July 2026 (CCAF preliminary 2025 results: 190 TWh, about 48 MtCO2e).
12. **R12** – Ember, Global Electricity Review 2026 (renewables 33.8% of global electricity in 2025).
13. **R13** – Down To Earth, Clean energy meets all global power demand growth as renewables overtake coal: Ember report 2026, April 2026 (global average 458 g CO2e/kWh in 2025).
14. **R14** – CCAF, Cambridge Digital Mining Industry Report, April 2025 (42.6% renewables in the Bitcoin mining mix).