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To: [DigitalConnectivity](#)
Subject: Consultation on the Digital Connectivity Strategy - Not Here, Not Anywhere
Date: Tuesday 29 March 2022 07:45:01
Attachments: [Public Consultation_Digital Ireland - Digital Connectivity Strategy.docx](#)

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Good morning,

I hope you're keeping well.

Please see attached a submission from NHNA to the [Public Consultation](#) on the Digital Connectivity Strategy.

Kind regards,



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on behalf of

Not Here Not Anywhere - an all-volunteer organisation

notherenotanywhere.com

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www.notherenotanywhere.com
T:@NHNAireland
I:@notherenotanywherenhna
F:@notherenotanywherenhna
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[REDACTED],
Consultation on the Digital Connectivity Strategy.
Department of the Environment, Climate and Communications,
29-31 Adelaide Road,
Dublin,
D02 X285,

27 March 2022

Public Consultation: Consultation on the Digital Connectivity Strategy

Submission - Not Here Not Anywhere

This submission is made on behalf of Not Here Not Anywhere (NHNA), a nationwide, volunteer-grassroots, non-partisan group campaigning to end fossil fuel exploration and the development of new fossil fuel infrastructure in Ireland and across the world. We advocate for fair society-wide energy usage and a just transition to renewable energy systems.

We welcome efforts to improve digital connectivity throughout Ireland in the hopes that fossil fuel use from commuting to Dublin may be diminished.

This submission wishes to respond to the following consultation question:

Consultation Question 6: The Department welcomes any other general observations and views on the State's Digital Connectivity Strategy and how it can be improved?

With regards to the section of the Digital Connectivity Strategy that refers to the impact of digital technologies on sustainability, NHNA welcomes the commitment from the government to "*Conduct analysis into positive and negative impacts of digital technological changes on sustainability*". However, we argue that this does not go far enough to mitigate the environmental impacts of digital technologies and furthermore, many negative impacts of digital technologies are already known, for example, in relation to data centres.

Although the purpose of this Digital Connectivity Strategy is to set out the key targets to be achieved by the telecommunications sector, which does not necessarily include the data storage industry, we found the omission of data centres in the Digital Connectivity Strategy to be a considerable oversight. The strategy fails to explicitly note the role of data centres as part of Ireland's ongoing digital transformation and, in particular, it fails to acknowledge the high level of electricity required to power data centres makes them a huge risk to achieving the rapid, just energy transition to a fossil-free future that we urgently need.

Recommendations

To ensure that data centres do not undermine the just transition to a fossil-free future, we make the following recommendations to the Department of Environment, Climate and Communications:

1. A national policy must be developed that sets a cap on the level of data centre energy demand that can be accommodated by the grid, while meeting our renewable energy and climate targets consistent with our commitments under the Paris Agreement. A moratorium should be placed on data centre development until this policy is developed.
2. New data centres must be powered entirely by onsite or new off site renewable energy. Carbon neutrality achieved by the purchase of carbon credit is not sufficient.
3. New data centres should have infrastructure in place to enable heat generated from them to be utilised for district heating systems
4. Where technically possible, heat generated from a data centre should be utilised for district heating systems.

As Eirgrid has estimated, data centres may account for up to 27% of Ireland's electricity demand by 2028 (Eirgrid, 2020). The Irish Academy of Engineering predicts that data centre development will add at least 1.5 million tonnes to Ireland's carbon emissions by 2030, a 13% increase on current electricity sector emissions, and will require an investment of €9 billion by 2027 (Irish Academy of Engineering, 2019).

For example, if Amazon's eight centre project in Mulhuddart, Dublin 15, is realised, by 2026 it would use c. 4.4% per cent of the State's entire energy capacity, the equivalent of Galway city, but employ only 30 people post-construction, largely in facility maintenance (Lillington, 2018). The Apple data centre proposed for Athenry, Co. Galway, would have ultimately used over 8% of the national capacity, more than the daily entire usage of Dublin, and would have required 144 diesel generators as back-up (Climate Home News, 2017). The government has acknowledged that "data centres pose considerable challenges to the future planning and operation of Ireland's

power system” (Department of Business, Enterprise and Innovation, 2018). These challenges include higher electricity costs for consumers (Taylor, 2018).

Currently, many companies claim to operate data centres powered by 100% renewable energy. However, the energy is largely sourced indirectly through Renewable Energy Certificates or Purchase Power Agreements (Chernicoff, 2016), which means that the energy is sourced from the grid, which in Ireland is 69% fossil fuel-powered (Sustainable Energy Authority of Ireland, 2019). If we continue to allow companies to virtually purchase clean energy where it is cheapest to create, while actually using and increasing demand for dirty energy in Ireland, we allow them to profit while our real emissions continue to rise. It is crucial therefore that data centres are powered directly by onsite renewable energy generation such as rooftop solar farms or genuinely new offsite generation such as offshore wind or solar farms.

The government has acknowledged that “data centres pose considerable challenges to the future planning and operation of Ireland’s power system” (Department of Business, Enterprise and Innovation, 2018). These challenges include higher electricity costs for consumers (Taylor, 2018). The Danish Council on Climate Change recommended in April 2019 that the Danish government legally binds data centre owners and developers to contribute to the infrastructure required to supply the centres with renewable energy, such as wind and solar farms (Irish Examiner, 2019).

It is crucial that Ireland does not further lock-in its dependence on fossil fuels if we are to meet our climate targets under the Paris Agreement and the Climate Action and Low Carbon Development (Amendment) Bill 2021 - which legally obliges us to achieve a 51% reduction of our 2018 emissions levels by 2030 and net-zero by no later than 2050.

Conclusion

To meet the greenhouse gas emissions targets set out in the Paris Agreement, and in the newly published Climate Act, it is paramount that the Department acknowledges and addresses the impact that data centres have on our net emissions as part of the Digital Connectivity Strategy for Ireland. To address this issue and to ensure that data centres do not undermine our climate commitments, we ask for a moratorium on data centres until a cap can be set based on climate targets and they can be run entirely on renewables.

Yours sincerely,



On behalf of
Not Here Not Anywhere

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