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Need of environmental data and standards for the ict sector

Open letter to the European Commission

Brussels, 19 April 2021

To the European Commission

Margrethe Vestager, Executive Vice-President “A Europe Fit for the Digital Age”
Frans Timmermans, Executive Vice-President “European Green Deal”
Valdis Dombrovskis, Executive Vice-President “An Economy that Works for People”
Thierry Breton, Commissioner “Internal Market”

Dear Vice-Presidents, Dear Commissioner,

We are writing to you with a call to take action to limit the environmental impact of the ICT sector. The European Commission’s two key priorities for the upcoming years are Europe Fit for the Digital Age and the Green Deal. To reach both of these priorities, **we must ensure the digital transition promotes and does not hamper the green transition**. The European Union must accelerate innovation and digitalisation in a way compatible with our CO2 reduction goals, climate neutrality aims and high environmental standards. The Commission recalled in its Communication COM(2020)67 that “the environmental footprint of the sector is significant, estimated at 5-9% of the world’s total electricity use and more than 2% of all emissions.” Addressing the environmental impact of the ICT sector can only be done with the relevant information and data to make digital technologies and infrastructures, such as data centres sustainable. We therefore call on the Commission to take the necessary steps in the **Non-Financial Reporting Directive**, the **Data Act** and to present **legislation for sustainable and circular data centres**.

The necessary information to assess the impact of technology on the climate and the environment is lacking. This allows some big tech companies to make net-zero pledges based on a strategy of greenwashing towards our European citizens. While claiming to be green, emissions are not lowered and pollution continues. Other companies willing to improve in good faith are hampered by data gaps and lack of harmonised reporting and lack of harmonised reporting. Without clear, harmonised and quantifiable reporting standards, tech companies cannot be held accountable for their environmental impact.

T**he review of the Non-Financial Reporting Directive is a crucial first step** in tackling the information

deficit we face over the impact of the ICT sector on the environment and is key in stopping greenwashing in this sector. Currently, environmental reporting is often vague and fragmented with different companies using different methodologies. The Commission needs to ensure these numbers become quantifiable, comparable and will ultimately enable society to hold companies accountable. This is why we urgently **call for standardised methods and prescriptive formats for calculating CO2 emissions and reporting environmental impact**. To be aligned with the objectives of the Green Deal, the Non-Financial Reporting Directive should go beyond general reporting on the sustainability strategy and plans of a business and **include a mandatory environmental impact assessment of the corporations product's, services and used infrastructures, using a standardized life-cycle assessment methodology** available to the public.

Already in October 2020, the Parliament called the Commission to tackle the environmental impact of AI technologies, notably in terms of infrastructure and throughout the lifecycle of AI systems (2020/2012(INL)), while highlighting the critical role of these technologies for attaining the goals of the Green Deal, the UN Sustainable Development Goals and the Paris Agreement, and in boosting the impact of policies delivering environmental protection, e.g. regarding waste reduction and environmental degradation.

The Data Act must form a second step. Data can help assess and tackle environmental challenges, save resources, contribute to a fully circular economy, reduce waste, promote the transition towards renewable energy and enhance mobility patterns. However, the data essential for reaching the Green Deal is often fragmented or simply unavailable. We urgently ask the Commission to take action and **make all private and publicly owned data datasets essential to the Green Deal freely available, accessible, standardised and interoperable** in the Data Act. Sharing of data essential to the Green deal must be mandatory. We call on the Commission to assess which datasets are essential to the Green Deal. **All information relating to the environmental impact of products, services and used infrastructures should be deemed essential data**. This will allow for policy-wise decisions and to support sustainable innovation.

Digital infrastructures have a huge environmental impact. Running and cooling data centres requires a significant part of our energy resources, while the heat data centres produce can be reused for other circular purposes, such as heating houses. This promise of circularity is currently often not fulfilled in practice. Moreover, the environmental impact reaches further than CO2 emissions and includes water pollution and use of rare metals. **Data centres taken up in the EU's taxonomy in the delegated act that will be presented this Wednesday must at minimum meet the technical expert groups' standards**. But, if the Commission is serious about limiting the environmental impact of the ICT sector and about green technology in the EU, we need to go further than voluntary codes of conduct and further than only looking at energy consumption. We therefore urgently **call on the Commission to present legislation with clear obligatory sustainability and circularity standards for all data centres in the EU**.

Dear Vice-Presidents, Commissioner, we ask you for serious action in the Non-Financial Reporting Directive to ensure **standardised, quantifiable methods to report environmental impact**. In the Data Act we ask you to **guarantee mandatory public access to the information and data relevant to the Green Deal** as a first step to limit the impact of the ICT sector on the environment. To make the tech sector climate neutral by 2030, we need **a clear legislative proposal for sustainable and circular data centres in the EU**. Only then we can ensure the digital and green transition can be reconciled and promote each other.

Yours Sincerely,

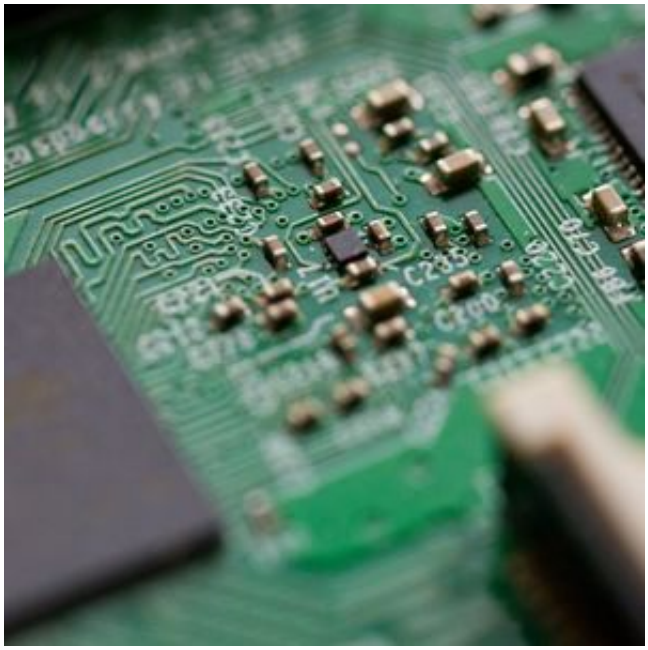
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Contact person



Narmine Abou Bakari

Digital Rights campaigner

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