



Not Here Not Anywhere
For a fossil free future for Ireland
www.notherenotanywhere.com
info@notherenotanywhere.com



Climate Justice Universities Union
<https://climatejusticeuniversitiesunion.org/>
climatejusticeuni@proton.me

FAO: Department of Enterprise, Tourism and Employment

Re: Public Consultation on EU proposal for a Cloud and AI Development Act (CADA)

18 September 2026

This submission is made on behalf of Not Here Not Anywhere (NHNA) and the Climate Justice Universities Union (CJUUN). NHNA is a grassroots climate campaigning group advocating for no new fossil fuel exploration or infrastructure and a just transition to renewable energy systems. CJUUN is a member-led transboundary and transdisciplinary international collective aiming to transform higher education to accelerate a just transition and advance climate justice.

The proposed Cloud and AI Development Act (CADA) aims to dramatically and rapidly increase the EU's data centre capacity, accelerate AI research and development (R&D) and accelerate permitting of data centres. The Act overstates the expected economic, social and environmental value of AI and does not sufficiently recognise its catastrophic environmental impacts. The preferred policy options and measures underpinning the Act would put in place a preferential policy regime that would oblige Member States to identify fast-track zones for data centres and allow data centres to be designated as strategic projects.

This submission highlights a number of key environmental and social risks of AI and data centre expansion that are not adequately addressed in the CADA proposal.

Contradiction with EU Climate Goals

Data centre expansion at the scale proposed in the Act is wholly incompatible with the EU's climate and environmental goals. This is clearly illustrated by the results of the European Climate Law (ECL) consistency check conducted in the CADA [Impact Assessment \(Part 1\)](#), which models the estimated electricity and Greenhouse Gas (GHG) emissions impacts of potential policy scenarios. As Figure 1 shows, all policy scenarios under consideration result in a significant increase in electricity use and GHG emissions (expressed in CO₂e - CO₂ equivalent) between 2025 and 2036.

Table 10. EU-27 data centre capacity in 2036: electricity and CO₂ impacts vs baseline

Scenario	2036 Capacity (GW)	PUE 2036	Electricity Use 2036 (TWh)	Cumulative 2025–2036 (TWh)	CO ₂ e /GW 2036 (Mt/GW)	Cumulative CO ₂ e 2025–2036 (Mt)
Baseline	46.3	1.23	314	2 571	1.18	495
PO1-A	52.2	1.18	339	2 701	1.13	518
PO1-B	65.9	1.12	408	3 028	1.09	576
PO1-C	58.7	1.05	340	2 737	1.01	525

Figure 1: Electricity and CO₂ impacts vs baseline for policy scenarios PO1-A, PO1-B and PO1-C. Source: SWD (2026) - [Impact Assessment \(Part 1\)](#), p.74).

The baseline scenario, which assumes that today’s policies and regulations are maintained, results in the lowest cumulative GHG emissions over the next ten years. The preferred policy option, PO1-B, is the most environmentally damaging option, increasing emissions by 82Mt above the baseline estimate. The Commission justifies its recommendation of PO1-B from an environmental perspective by arguing that increased resource use will be somewhat mitigated by the advancement of energy efficiency technologies that will enable more efficient data centres. The [summary of the Impact Assessment](#) states that, in this way, “CADA is expected to help the EU alleviate the carbon footprint of its data centre industry. This will contribute to the EU’s broader climate goals and commitments”. However, the assessment is clear that under PO1-B, the scale of development is such that “capacity expansion outweighs efficiency gains” [Impact Assessment \(Part 1\)](#), p.91).

It is argued in the assessment that the environmental impacts of option PO1-B can be partially alleviated by adopting two policy measures: PM8 – funding for resource efficient data centres and PM9 – EU support for strategic data centre projects. Strategic data centre projects are characterised in the [introduction to the Act](#) as those with “significant built-in innovation and sustainability or that contribute to the balanced distribution of computing capacity.” (2026:2). It is unclear, however, if and how these measures might reduce the expected environmental impacts of PO1-B (Figure 1). The Impact Assessment further states that the baseline pathway “is not compatible with long-term climate neutrality goals, as it leads to increased energy demand without integrating sustainability requirements”. If the baseline pathway is not compatible with long-term climate neutrality goals, the claim that PO1-B, which would generate an additional estimated 82Mt in cumulative emissions over ten years, would be compatible with the EU’s targets under the ECL, is not credible. Modelling does not appear to have been conducted to align the increased emissions expected under PO1-B with the Mt reductions required under the ECL, therefore the claims that the Act is compatible with the ECL are unsubstantiated. In addition, the ECL is not addressed in the discussion on coherence with existing policy and regulation in the Impact Assessment (Part 1 pp. 85-87).

Implications for Ireland

It is [estimated](#) as of June 2026 that there are 107 currently operational data centres in Ireland, nine under construction, and 43 with planning approval. Analysis from the as yet unpublished Technopolis (2025) study that informs the CADA Impact Assessment illustrates that Ireland

has 31Mw of installed data centre capacity per 100,000 people, more than three times the nearest Member State (Figure 2). The EU average is 1Mw per 100,000 people.

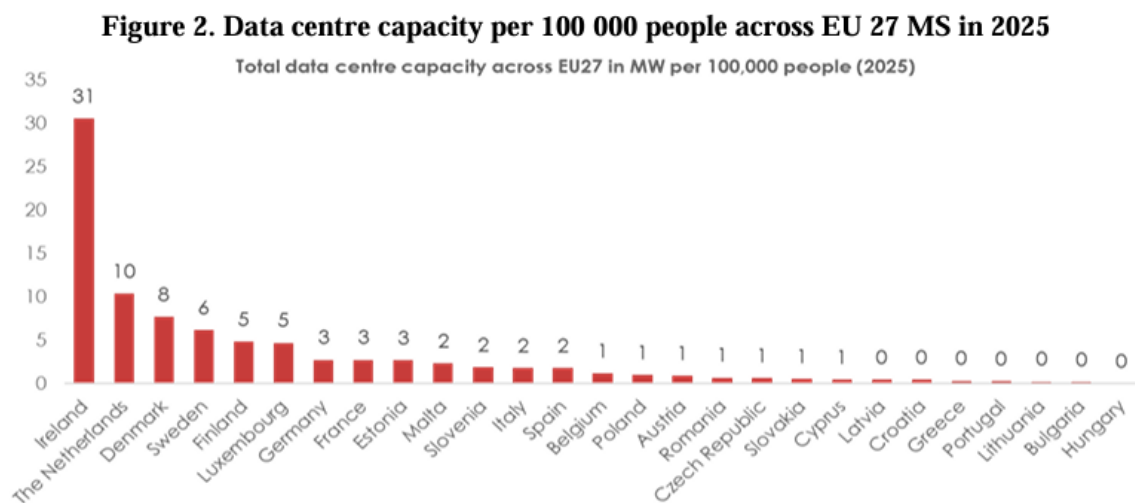


Figure 2: Data centre capacity (MW) per 100,000 people in EU Member States in 2025. Source: Technopolis (2025), Cited in SWD (2026) - [Impact Assessment \(Part 1\)](#), p.74).

There is growing awareness of the significant negative environmental and social implications of data centre expansion in Ireland. Data centres account for [23% of all electricity use](#) in Ireland, more than all urban households, a figure that rises to [50% in Dublin](#). Electricity consumption by data centres has [tripled between 2019 and 2025](#). [Recent analysis](#) calculated that data centre energy demand added a cumulative average of €360 to household electricity bills between 2015 and 2023.

AI has exacerbated the challenge of powering data centres sustainably. AI-focused data centres are characterised by accelerated servers which train and run AI models. [According to the IEA](#), these AI data centres account for an estimated 24% of data centre electricity consumption today, but are expected to reach over 50% by 2030. Training and using an AI model requires intensive computing power, which can lead to rapid power load swings and affect grid power quality. This is particularly significant in areas like Dublin with clustered data centre development.

Under the [new policy for large energy users](#) established in December 2025, data centres applying for a grid connection are now required to meet 80% of their annual electricity demand with additional renewable energy generated in Ireland, with a six year “glide path” to allow for the development of the infrastructure. However, this target is hugely ambitious. Recent [analysis from Friends of the Earth](#) compared predicted data centre electricity demand with several renewable energy capacity scenarios from Eirgrid and the Sustainable Energy Authority of Ireland (SEAI). The modelling showed that even assuming a huge jump in renewables in 2030, renewable capacity under any scenario is not enough to meet additional

demand from data centres. In some cases, a data centre is being used as justification for building new fossil fuel infrastructure. The Shannon LNG project promoter, New Fortress Energy, has [declared plans for a huge data centre](#) next to a proposed LNG terminal. The Climate Change Advisory Council [stated earlier this year](#) that the expected increase in data centre energy demand over the next six years “will continue the well-established trend of data centres cannibalising any increase in Irish renewable capacity, causing stagnation of the share of renewable electricity meeting demand while ensuring a guaranteed increase in emissions from fossil fuel use for on-site generation” (2026:19).

It is stated in the Impact Assessment (Part 1, p. 87) that, under PO1-B and PO1-C, the data centre rating scheme proposed in the EU Energy Efficiency Directive (EED) can be used to identify “sustainable” data centres suitable for fast-track areas. Beginning in 2024, the EED introduced a monitoring and reporting requirement for data centres. To date the only public disclosure required has been aggregated electricity and water use, among other metrics, on a Member State basis. A [European-wide investigation found](#) that industry lobbying had successfully led to the addition of a “secrecy provision” to the legislation, allowing data centres to display aggregated statistics at national level, rather than at the level of an individual facility. Reporting to this database has also been limited to date. The public [report](#) and [dashboard](#) shows that in 2024, only 18 data centres in Ireland fulfilled these requirements, and the Commission has taken an [infringement case](#) against Member States, including Ireland. The next phase of reporting, the “common rating scheme” for data centre environmental performance, would require operators to disclose key environmental metrics. Again it appears that the [initial proposals](#) from the Commission that the label would include detailed metrics such as total water and energy consumption, type of energy and water and total emissions have been [significantly watered down](#).

The preferred policy option in the CADA proposal, PO1-B, requires Member States to aggressively promote data centre expansion nationally, through appointing a national facilitator to support data centre permitting (PM4), identifying fast-track areas for data centre expansion, with accelerated 12 month permitting (PM5), allocating national funding support to data centres (PM6), setting national deployment targets (PM7), and leveraging EU R&D funding (PM8) and EU deployment funding for strategic projects (PM9). Applying such policies in Ireland would be wholly inappropriate and take the sector’s already disproportionate environmental and social impacts from dangerous to catastrophic.

Community Opposition to Data Centres

Public opposition to data centres is growing in Ireland and across Europe, with multiple ongoing community campaigns (e.g., [Kildare](#) and [Waterford](#) in Ireland and in the [Netherlands](#)), along with [legal cases](#). Relevant legislation is also emerging, legislative proposals, for example a [new law in Denmark](#) to ensure that the power needs of essential

services are prioritised over data centres and a [levy on data centre electricity use](#) in Virginia, US. A [recent survey](#) of over 300,000 EU citizens found that “86% believe that new data centres should only be built if powered entirely by renewable energy sources”. CADA will reduce the chance for communities to voice their concerns on data centres in their area; section 41 of [the Act](#) specifically includes a new proposed regulation on “speeding-up environmental assessments”, which would establish a “common acceleration framework”, including allowing data centre projects in acceleration zones to be considered as strategic projects. This would undermine access to justice for communities on environmental matters under the Aarhus Convention and the associated EU regulations.

The [CADA Impact Assessment](#) minimises the considerable community concerns over data centres. It briefly refers to “documented instances of public resistance against [data centre] construction due to environmental concerns, e.g. energy consumption and water security and potential consequences on related prices” (p 73), but immediately counters that citizens increasingly use AI in daily life and will benefit from increased AI and cloud computing capacity. The [Impact Assessment \(Part 2\)](#) clearly shows that the EU public consultation and stakeholder engagement related to the Act was dominated by industry engagement. Several stakeholder workshops were held but these were virtually all industry workshops, with no civil society organisation (CSO) or community workshops evident (2026:pp20-21). The views of industry stakeholders are referenced multiple times in the Impact Assessment and, while 7% of submissions to the public consultation came from CSOs or consumer groups, it is difficult to identify any reference to their perspectives in the Impact Assessment. In addition, direct impacts on communities are barely mentioned, beyond the risk of higher energy and water costs, and water impacts in water-stressed areas (in a footnote) ([Impact Assessment \(Part 2\)](#), p31).

Data centre and AI expansion also have limited benefits for the Irish workforce and pose new threats to workers. Once operational, data centres provide very limited employment. Currently just [0.1% of the Irish workforce \(3,300 people\)](#) work directly in data centres. Increasing AI adoption may also lead to job losses. A [2026 ESRI study](#) estimated that 7% of jobs could be displaced in the short- to medium-term, leading to a drop in average household income that will not be counterbalanced by potential productivity gains or wage increases for some workers. There is an increasing [“AI backlash”](#) related to its impacts on jobs, with anxiety and distrust towards AI growing among young people ([Lira et al, 2026](#); [Gallup, 2026](#); [Lichtenberg, 2026](#)), and concerns expressed even by developers on the damaging impacts of the technology.

Broader Concerns on the Expansion of AI

The CADA proposal assumes that expansion of AI is a de facto positive for EU citizens. It builds on the EU’s [Apply AI strategy](#) which encourages an “AI first policy”, where “AI is considered

as a potential solution whenever organisations make strategic or policy decisions, taking into careful consideration the benefits and the risks of the technology.” The modelling in the CADA impact assessment is based on the assumption that demand for computing capacity in the EU will increase by 13% annually. This ignores the considerable broader concerns emerging from multiple sources and across scientific communities relating to the unethical, ecologically destructive and extractive-exploitative nature of what have been characterised as “displacement” AI technologies ([Guest, 2025](#)).

Displacement AI refers to sophisticated statistical models, such the large language models (LLMs) we are most familiar with, so large they impact humans and the environment through their energy, land, and water use (e.g. [O'Donnell & Crownwell, 2025](#); [Valdivia, 2025](#)). The development of this technology depends on vast swathes of data, which is mostly stolen or otherwise unethically obtained or refined (e.g. [Bender et al., 2021](#); [Lantyer, 2025](#)). Ultimately, this technology exists in a displacement relationship to humans, i.e. this type of AI product is harmful to people, it contributes to deskilling, and it obfuscates cognitive labour (e.g. [Glickman & Sharot, 2025](#); [Kidd & Birhane, 2023](#); [Kosmyna et al., 2025](#); [Yeung et al., 2025](#)). The proposed Act would turbocharge displacement AI, concentrating EU investment into a dangerous technology that we are only beginning to understand the harms of.

POI-B will have implications for Ireland that we are not equipped to support. The CADA proposal [identifies energy, water, land and financing as key constraints](#) to data centre development, positioning these as barriers to be overcome in order to advance AI expansion at all costs. All of these resources, however, are essential to safeguarding economic, environmental and societal stability in the EU and Ireland. Data centre growth is already competing for land and resources with [new housing builds](#) and with [energy transition goals](#) in Europe. This would worsen with the proposed expansion of AI across Europe. Findings from a [Beyond Fossil Fuels report](#) indicate that growth in data centres across Europe will likely compete for grid access with public infrastructure such as houses, hospitals, and schools. They recommend that policymakers “must consider moratoria or caps on data centre energy demand” while this competing demand is the case.

Europe’s renewable energy sector is not in a position to meet both existing infrastructure needs (housing, etc.) and planned AI growth. While it is preferable that data centres utilise renewable sources rather than fossil fuels, estimates from a [2025 report](#) show that if data centre energy demand is met by only renewable sources, “nearly 20% of new renewables in the EU would need to go to data centres”, directly limiting access to renewables from other sectors. With the EU’s even more ambitious AI growth plans, this estimate is likely to increase.

We urge the Department to conduct an immediate and comprehensive impact study to assess the environmental, social and economic implications for Ireland of the proposed Act and to pause further development of the sector until the serious related concerns are addressed.