Google Data Centre: Lacking transparency in environmental impact assessment – best available technology disregarded

Today, Friday 27 March 2026, marks the end of the public consultation period regarding the environmental impact assessment (étude d'évaluation des incidences sur l'environnement) for the Google data centre in Bissen (London Bridge project). In this context, Mouvement Ecologique has submitted a 30-page objection following consultation with experts and a legal opinion.

The dossier now available: confirmation of Mouvement Ecologique's previous analysis

The Google data centre dossier has a long history. As a reminder:

- For years, the Mouvement Ecologique has campaigned against the planned water-cooling system. According to estimates, this would have required around 10 to 15% of Luxembourg's current water consumption, which would have far exceeded Luxembourg's available water capacity. The dossier now available explicitly confirms this argument!
- For years, the Mouvement Ecologique has also been campaigning to weigh up the pros and cons of the Google project for the general public. To date, however, neither Google nor the state has presented an analysis of the project's environmental impact in relation to the economic benefits and the jobs it would create.

The dossier now available is characterised, on the one hand, by a lack of transparency on key aspects (including references to confidentiality clauses) and, on the other hand, reveals that Google still does not intend to use the best available technology, despite, among other things, significant energy consumption.

The Google project – also a question of European data sovereignty

The debate surrounding Google today must be different from that of 10 years ago: American companies such as Google control over 70% of 'cloud services' in Europe. The role of European players is steadily dwindling and currently stands at 15%. American companies are further expanding this market dominance through targeted, controversial business practices. The resulting loss to the European economy is dramatic, amounting to several billion euros. But above all: the development of European companies is being significantly hampered.

Furthermore, the argument that Luxembourg can position itself in the digital sector thanks to Google is no longer valid. Luxembourg has now established a high-performing and attractive digital infrastructure thanks to Post Luxembourg and LUXCONNECT. Due to its high security standards, even the European Commission has decided to store some of its sensitive data in Luxembourg. As a result, Luxembourg has even managed to attract one of the first 'high-performance computers'. Anyone who advocates for European sovereignty in the digital sphere must support European companies and not roll out the red carpet for Google.

A public debate should be launched on whether the unique site in Bissen (due to its proximity to CREOS's largest electrical transformer) is not too valuable for Luxembourg's digital future to be handed over to a US technology company, rather than to Luxembourgish or European players with whom the government is seeking to forge a close alliance.

A project with significant implications

Three facts illustrate the scale and impact of the project:

- Google would be responsible for an additional 5–7% of Luxembourg's CO_2 emissions;
- The electricity consumption would account for approximately 15% of Luxembourg's total electricity consumption (more than all Luxembourg households combined);
- 12 hectares of land would be sealed.

Environmental impact assessment of the data centre: lacking transparency in key areas – best available technology disregarded

Mouvement Ecologique identified the following shortcomings, amongst others, in the dossier made available for public inspection:

- **Key data is missing – contrary to legal requirements:** e.g. regarding the energy audit or the selection of the cooling system. For example, there is no comprehensive technical comparison between air and liquid cooling that meets the requirements for the application of the best available technology. Similarly, there is no complete life-cycle analysis of the emergency power system – here, Google is relying on a huge number of diesel generators instead of battery storage, which would contribute both to the site's resilience and to the decarbonisation of the grid, as well as to Google's international commitments.
  Google cites alleged trade secrets in this regard, which runs counter to citizens' right to access information regarding environmental impacts, as this makes the energy concept and its effects on the climate and environment impossible to verify.

- **The Google data centre in Bissen – far less efficient than Google's usual standard**: For data centres, there is an energy efficiency index (PUE) that serves as a benchmark for energy policy – the closer to 1, the better. According to experts, Google's global PUE stands at 1.09. Due to a problematic cooling system , it would be 1.3 at the planned data centre in Bissen! Compared to similar Google facilities abroad, the project in Bissen therefore does not meet current standards (set by Google itself).

- **Google does not provide a satisfactory answer as to where the energy comes from:** although Google is estimated to account for around 15% of the country's electricity consumption, it merely states in a single sentence its intention to use 100% renewable energy, only to contradict itself with using invoking 'CFE'. CFE stands for 'carbon-free energy', and opposes true renewable energies, includes nuclear power**. The dossier therefore does not clearly indicate whether Google intends to import nuclear power, possibly from Cattenom or Tihange – which would be quite an affront – or from 100% renewable energy sources. But there is also a complete lack of detail regarding renewable energy, apart from the fact that Google claims it wants to generate 0.3% of its electricity on-site using solar panels. Where the remaining 97.7% of the electricity is supposed to come from is a complete mystery.**

  There is also a complete lack of any clear commitments regarding where the energy will come from. After all, the requirement is to ensure a 24/7 supply and 100% renewable energy through an electricity supplier, a storage strategy integrated into the renewable energy supply plan, and a demand-side management programme that enables the site's consumption to be adjusted during peak times on the Luxembourg grid.

- **There are no plans to make the use of the considerable amount of "waste" heat mandatory**. Yet a data centre the size of London Bridge is, by its very nature, an immense source of heat. Almost all the electricity consumed by the servers is converted into waste heat. Based on projected electricity consumption, it can be assumed that 1,000 GWh/year of usable heat will be generated. This **corresponds to the heating requirements of several tens of thousands of Luxembourgish households.** The new data centre is also located near several district heating networks, which are currently powered by gas (Ettelbruck, 6 km away), diesel (Diekirch, 10 km away) or wood (Bissen) and could therefore utilise the enormous amount of waste heat available from Google.

  The current facility does not, a priori, even ensure that the waste heat can be utilised at a later stage.

- Further **shortcomings in the specific design:** Other aspects critically examined in the objection relate to the impact on the adjacent natural environment, the water permeability of the soil sealing, the greening of the hall roofs, and measures for local rainwater retention.

As such, the dossier on file does not comply with the requirements of the amended Law of 15 May 2018 on Environmental Impact Assessment, nor with those of the Law of 25 November 2005 on Public Access to Environmental Information, which forms the essential framework in this area.

For these reasons, the Mouvement Ecologique strongly urges that the current procedure be deemed null and void. Google should be required to provide the missing or insufficient information, with a view to a new public procedure that meets the legal requirements and the best available technology.

Should a permit nevertheless be granted on the basis of the existing documentation and without considering the well-founded arguments of Mouvement Ecologique, the latter reserves all legal rights.

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