Translated by deepl.com

Google data centre:
Mouvement Ecologique's technical criticism confirmed by developments at EU level

As is well known, Mouvement Ecologique – following consultation with experts and a legal opinion – submitted a 30-page objection as part of the public consultation process for the environmental impact assessment of the Google project in Bissen.
A key criticism concerned the data centers' energy efficiency factor (PUE – Power Usage Effectiveness): a value closer to 1 indicates high efficiency.

According to the environmental impact assessment, this figure is expected to be 1.3 for Google in Bissen, whilst Google achieves an average of 1.09 over 12 months across its entire global network of data centers'. The internationally recognised standard for large data center's is 1.15. (1)

According to today's press reports, the EU intends to introduce a kind of 'energy label' for data center's (2). Alongside water consumption, the energy efficiency factor would be a key element of this label.

According to the European Commission, an A class would be introduced for the best energy efficiency, with a value lower than or equal to 1.15.

The Google project in Bissen, with a PUE value of 1.3, would be way off the mark…

Questions by Mouvement Ecologique:

- How did Google's environmental impact assessment end up in the public consultation process, even though international standards on energy efficiency are not being met?
- Did Google therefore request a confidentiality clause regarding the energy audit, which contravenes citizens' right of access to information concerning environmental impact?
- How does Luxembourg intend to establish itself as a digital hub on the international stage if basic standards are not applied in a data center of this kind?

There can be only one explanation for this irresponsible approach: the Ministry of the Environment and Energy, or the government, has allowed itself to be taken for a ride by Google …

Google's intention is likely – as experts have long suspected – to secure a more favorable permit (because it is less stringent) before the EU label is introduced.

Does our country wish to play along with this game, or will it stand by its commitments in the environmental and climate sectors?

The full text of Mouvement Ecologique's objection can be viewed at www.meco.lu .

Mouvement Ecologique asbl

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(1) Quote from the Mouvement Ecologique's objection:

5.1 Description of the issue This aspect is one of the most important points in the dossier, from both a technical and a legal perspective. The EIA commits to a PUE of 1.3 for the London Bridge site (PUE, Power Usage Effectiveness, is the benchmark metric for measuring the energy efficiency of a data centre). This figure is directly contradicted by data published by Google itself: Google reports a rolling 12-month average PUE of 1.09 across its entire global portfolio of large data centres in 2024. The IEA notes that the global average PUE for hyperscale data centres is 1.15.

(2) Extract from the article by paperjam:

In practical terms, each facility will be assessed according to two key indicators. The first, 'power usage effectiveness' (PUE), a criterion already well known in the world of data centres, measures the data centre's overall energy efficiency. The closer it is to 1, the more efficient the infrastructure is. Brussels has set precise thresholds: a Class A rating would correspond to a PUE of 1.15 or lower, whilst a Class G rating would apply to facilities exceeding 1.9. Between these two, the scale progresses in intermediate steps, from B (up to 1.25) to F (up to 1.9).
(…) At this stage, the major cloud providers should generally be at the top of the rankings, at least in terms of energy efficiency. Amazon Web Services (AWS) thus has an average PUE of around 1.15, which is on the borderline of Class A, whilst Google Cloud claims an even lower figure, close to 1.09, clearly in the top category. Microsoft Azure sits slightly above this, at around 1.16, which would correspond more to a Class B rating in the future European system.