

Environmental Protection Agency
McCumiskey House,
Richview,
Clonskeagh Road,
Dublin 14,
D14 YR62



Date: 16th April 2023

Dear Sir/Madam,

RE: Objection to the Application for Industrial Emissions License by Amazon Data Services Ireland Ltd

Lic application/review#: LA009979

Register #: P1184-01

Activities to be licensed:

The Installation will include:

- 16 no. 6.49 MWth diesel powered emergency back-up generators,
- 1 no. 0.45 MWth diesel powered fire sprinkler pumps.

The combined thermal input from the installation is 180.55 MWth, this exceeds the 50MWth threshold of Class 2.1 First Schedule of the EPA Act 1992. ADSIL is therefore, applying to the Environmental Protection Agency (EPA) for an IE Licence principally relating to the operation of diesel-powered emergency standby generators under Activity Class 2.1.

Location of facility: Grange Castle South Business Park South, Baldonnell, Dublin 22

I write to you to object to the application by Amazon Data Services Ireland Ltd for an Industrial Emissions License for a development consisting of 17 no. diesel powered emergency generators (“Subject Application”). I write on behalf of Not Here Not Anywhere, a nationwide, 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.

NHNA welcomes Ireland’s commitment to transition to net zero by 2050 and the urgent adaptation of our energy supply. We recognise that the transition to renewables must be carried out in a way that guarantees nationwide energy security. However, the development and facilitation of new fossil fuel infrastructure to facilitate this transition is not a viable solution.

Background - Ireland’s Climate Obligations

Ireland has agreed to legal obligations to significantly reduce carbon emissions.

National Climate Objective

The Climate Action and Low Carbon Development (Amendment) Act of 2021 (hereinafter “Climate Act”) outlines Ireland’s legal obligations to pursue and achieve a “climate neutral” society by 2050,¹ and to reduce overall GHG emissions by 51% on 2018 levels by the 31st of December 2030.²

Carbon Budgets and Associated Sectoral Emission Ceiling

¹ Climate Action and Low Carbon Development (Amendment) Bill 2021, Part 2, Section 5

² *Ibid*, Section 9

The Climate Act of 2021 requires that the Climate Change Advisory Council prepares and submits to the Minister of Environment 5-year carbon budgets outlining the route to achieving the targets set within the Act.³ The Climate Act further requires the Government to set Sectoral Emission Ceilings for each sector.⁴

The Sectoral Emissions Ceiling for the Energy sector outlines a required reduction of 40% of CO₂eq by 2025 year-end, on the 2018 baseline.

Ireland is also a signatory and party to multiple international organisations and treaties relating to the Climate Crisis with the aim of avoiding the worst impacts of the crisis, adapting to the challenges it presents, and supporting a just transition.

Beyond Oil and Gas Alliance

During the United Nations Framework Convention on Climate Change 26th Conference of the Parties held in Glasgow in November 2021, Ireland became a core member of the international Beyond Oil and Gas Alliance⁵ (BOGA). An international alliance committed to aligning the usage and production of Oil and Gas to the objectives of the Paris Climate Accord.⁶ By joining BOGA, the Irish Government acknowledged and committed to a 55% reduction in natural gas between 2020 and 2030.

It is highly concerning that there are ongoing plans to develop and permit new fossil fuel infrastructure. These plans are inconsistent with the objectives Ireland committed itself to under the BOGA.

Reasons for Objection

Discrepancies/Omissions

Per the application, the generators would use a non-renewable fuel (diesel). We note a discrepancy whereby, in the Electricity Usage table (in the Water and Energy Usage section 4.6.1 of the application form), “Total Non-Renewable Electricity Generated and Used at the Site” if authorisation is granted is **blank**. This is despite the fact that the generators would be licenced to run up to 500 hours annually and (per the Thermal Energy Consumption section) would use 221 tonnes of “gas oil” annually.

Urgency of slashing greenhouse gas emissions

We have outlined Ireland’s multiple climate obligations above. However, even if ours and other nations’ climate obligations were to be met, these obligations are not strong enough to lead to the emissions reductions required to limit warming to an average of 1.5°C this century. This is what’s referred to as the “emissions gap” in the most recent IPCC report⁷. Alarmingly, Ireland is failing in most of its climate obligations (the “implementation gap”). Ireland overshot its 2020 emissions reduction target by 7 million tonnes of carbon in 2020.⁸

The latest IPCC report states:

“Risks and projected adverse impacts and related losses and damages from climate change escalate with every increment of global warming (very high confidence). Climatic and non-climatic risks will increasingly interact, creating compound and cascading risks that are more complex and difficult to manage (high confidence).”⁹

³ Climate Action and Low Carbon Development (Amendment) Bill 2021

⁴ Climate Action and Low Carbon Development (Amendment) Bill 2021

⁵ Department of Environment, Climate and Communications, “Minister Ryan announces that Ireland has joined the Beyond Oil & Gas Alliance (BOGA) to lead the transition away from global oil and gas production”, (11 Nov 2021)

⁶ Beyond Oil and Gas, “Who We Are”, Accessed on 24 January < <https://beyondoilandgasalliance.com/who-we-are/> >

⁷ A.4.3. [IPCC AR6 SYR SPM](#)

⁸ [Warning that cost of failure to meet climate targets could hit €8bn by 2030 - Independent.ie](#)

⁹ B2 [IPCC AR6 Synthesis Report Notes](#)

Given the increasing levels of disaster incurred with every increment that we warm the climate due to emissions of greenhouse gases, permitting any new fossil fuel infrastructure is unconscionable. The diesel generators in this application have, in total, a rating of 180.55 MWth. If licenced, they could be run for up to **500 hours annually**.

Lack of transparency & prioritisation in relation to data being stored

It would be unconscionable to licence a wealthy corporation like Amazon Data Services Ireland Ltd to burn additional fossil fuels and for questionable purposes at that. An independent research report commissioned by Veritas¹⁰ provides some insight into types of data being stored in data centres. Examining organisational data across 14 countries, the report found that only 14% of stored corporate data is “business critical” while 32% is redundant, obsolete or trivial. Another 54% is ‘dark’ data, out of sight of management. The report described a ‘deluge of data’ that is not being effectively managed. All of this data uses energy.

Transparency about what is being stored and for whom should be a requirement. It would enable society and the Government to rank different types of data storage services by importance to society, and be able to order data centres to turn off certain categories of services in different circumstances - such as in the event of a warning that the national grid may be unable to meet power demand - rather than allowing data centres to switch to proprietary, fossil-fueled generation

Resources to operate sustainably

This is one of a recent wave of applications from data centres to the EPA for industrial emissions licences. It appears that the industry, conscious of the pressures data centres are placing on the electricity grid and the associated risks to their operations, is seeking to add proprietary fossil fuel infrastructure to data centre sites, while also putting pressure on the EPA to speed up its decision making.

Adding fossil fuel infrastructure is not a viable solution. A company of Amazon Data Services Ireland Ltd’s resources (post tax profits of €36.09 million in 2022¹¹) should be required to ensure their data centres are powered entirely by either of the following:

1. On site direct renewable power source generation combined with renewable and reliable energy storage
2. Off site renewable power source and energy storage with dedicated grid connection, while avoiding questionable Renewable Energy Certificates.

We urge you to refuse this licence.

Sincerely,

Angela Deegan

On behalf of *Not Here Not Anywhere*

¹⁰ Veritas (2015). THE DATABERG REPORT: SEE WHAT OTHERS DON'T
https://branded-image.veritas.com/Web/Veritas/%7B364a7ca5-e05c-4fce-971b-88e18c62eafb%7D_45145_EMEA_Veritas_Strike_Report_Gulf.pdf

¹¹ [Revenue surges at Amazon's data centre business in Ireland – The Irish Times](#)