

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



Date: 3rd May 2023

Dear Sir/Madam,

RE: Objection to the Application for Industrial Emissions License by Google Ireland Limited.

Lic application/review#: LA010409

Register #: P1189-01

Activities to be licensed (From Non Technical Summary):

“The IE Licence will permit Google Ireland Ltd. to carry out the following new activity which is listed in the First Schedule of the EPA Act 1992, as amended;

2.1 Combustion of fuels in installations with a total rated thermal input of 50 MW or more.

The combustion plant on site consists of twenty four diesel fuelled back-up generators which would be used to power the data centre facility in the abnormal event where the normal supply of electricity was not available to the site from the national grid. If the use of all generators on site was required in an abnormal scenario this would trigger the Industrial Emissions Activity Class 2.1 as the combined rated thermal input of the back-up generators is more than 50MWth.”

Location of facility: Data Centre facility at Grange Castle Business Park South, Baldonnel Rd, Dublin 22, D22 X602

I write to you to object to the application by Google Ireland Limited for an Industrial Emissions License in relation to 24 no. diesel powered generators. I write on behalf of Not Here Not Anywhere (NHNA), 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 advance this transition is not a viable solution.

Background - Ireland's Climate Obligations

Ireland has agreed to legal obligations to significantly reduce its greenhouse gas (GHG) 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 greenhouse gas GHG emissions by 51% on 2018 levels by the 31st of December 2030.²

Carbon Budgets and Associated Sectoral Emission Ceiling

The 2021 Climate Act 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 Irish 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 climate change 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 and incompatible with the objectives Ireland has committed itself to under the BOGA.

Reasons for Objection

Discrepancies/Omissions

We note that, on 09 March 2023, the EPA issued a decision on confidential information submitted as part of the IE Licence application, stating that 'the capacity of individual combustion plant should be deemed confidential and the information regarding the quantities of diesel and electricity (energy) usage should not be deemed confidential.' Though this decision excuses the applicant from providing the capacity of individual combustion plant, we note that the applicant failed to provide information

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

² *Ibid*, Section 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/> >

even on the total thermal capacity of the 24 generators. This information has been provided in all other applications for Industrial Emissions Permits that we have reviewed and we would appreciate clarification as to why it was omitted in this case.

Per the application, the generators would use a non-renewable fuel (diesel). We note that in the Electricity Usage table (in section 4.6.1 - Water and Energy Usage), “Total Non-Renewable Electricity Generated and Used at the Site” is given as 1,700 both currently **and** in the event that licence authorisation is granted. This is despite the fact that the generators would be licenced to run up to 500 hours annually on a rolling average of three or five years, which could mean up to 2,500 hours in a given year and, per the Thermal Energy Consumption table, would use an estimated 262.64 m3 of diesel annually. The reasoning for this seems spurious - Note 1 under the Electricity Usage table stating “In the abnormal event where the normal supply of power was not available to the site, the backup generators would be required to supply electricity to the site due to a lack of supply from the grid. The amount of electricity that will be generated and consumed onsite is unknown and not possible to estimate for the future due to the nature of the use of the building.”

Energy Usage

Electricity Usage

Complete the table below with summary details of current and proposed electricity usage

(The following table contains additional guidance for certain fields where you see the small red triangle in the cell. To view the gui

Electricity type	Current Usage Per Calendar Year (MWH) *	Future Usage Per Calendar Year if Authorisation Granted (MWH) *
Electricity Purchased	180,000	240,000 (Note 2)
Total Renewable Electricity Generated and Used at the Site	N/A	N/A
Total Non-Renewable Electricity Generated and Used at the Site (Note 1)	1,700	1,700
Total Electricity Generated and Used	1,700	1,700
Total Electricity Used	181,700	241,700

Note 1:

During normal operations, a minimal amount of electricity is generated by the back-up generators and consumed by a load bank during the monthly testing/maintenance runs. During electrical maintenance activities, the electricity generated by the back-up generators is used to support the load in the buildings.

In the abnormal event where the normal supply of power was not available to the site, the backup generators would be required to supply electricity to the site due to a lack of supply from the grid. The amount of electricity that will be generated and consumed onsite is unknown and not possible to estimate for the future due to the nature of the use of the building.

Urgency of slashing GHG 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. Alarming, 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

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](#)

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

Given the increasing levels of disaster incurred with every increment that we warm the climate due to emissions of GHGs, permitting any new fossil fuel infrastructure is unthinkable. As mentioned above, the applicant appears to have omitted the total rating of the diesel generators for which this licence is being sought. It appears it could be as high as 1,140 MWth (40 MWth for the two fire-pump generators plus 1,100 MWth for the other generators). According to the application, the generators could be operated for up to **500 hours annually** as a rolling average over a period of either five years or three years, depending on whether they’re classified as “older” or “newer” generators.

Lack of transparency & prioritisation in relation to data being stored

It would be unconscionable to licence a wealthy corporation like Google Ireland Limited (\$13.9 billion in profit in the 3rd quarter of 2022¹⁰) to burn additional fossil fuels and for questionable purposes at that. An independent research report commissioned by Veritas¹¹ 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 the public and the Irish 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 rely more on proprietary fossil fuel generation at their data centres and is putting pressure on the EPA to speed up licensing of this practice¹².

Adding new fossil fuel infrastructure is not a viable solution. Instead of increased investment in and running of fossil fuel generators, a company of Google Ireland’s resources should be investing in alternatives such as non-fossil-fuel based backup, energy storage technology, and demand flexibility and should be required to power their data centres 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.

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

¹⁰ [Google's revenue continues to grow as its profits are still shrinking - The Verge](#)

¹¹ 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

¹² [Data centre giants warn minister over delays to back-up energy permits | Business Post](#)

We urge you to refuse this licence.

Sincerely,

Angela Deegan

On behalf of *Not Here Not Anywhere*