Data centres

Position statement

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About Doctors for the Environment Australia

Doctors for the Environment Australia (DEA) is an independent, non-government organisation of medical doctors in all Australian states and territories.

DEA's work is based on the premise that humans need a future with clean air and water, healthy soils capable of producing nutritious food, a stable climate, and a complex, diverse and interconnected humanity whose needs are met in a sustainable way. We are therefore interested in environmental protection and restoration to promote human health and social stability.

Acknowledgement of Country

Doctors for the Environment Australia's members live and work around Australia. We would like to acknowledge Aboriginal and Torres Strait Islander peoples as the Traditional Owners of these lands, in the spirit of reconciliation.

We recognise that First Nations peoples have cared for Country and lived sustainably for millennia, and that sovereignty of this land was never ceded. We pay our respects to First Nations Elders past and present, and to emerging leaders.

Summary

- Data centres are currently accelerating environmental crises and inequity.
- Current greenhouse gas emissions projections from data centres threaten to derail achieving Australia's emissions target and commitment under the Paris Agreement, posing dire human health risks.
- Poor planning and rushed approvals for the data centres that Artificial Intelligence (AI) relies on risk unacceptable environmental and health harms as well as wider impacts on infrastructure and communities.
- Existing regulatory frameworks have not kept up with the speed of the expansion of this sector, and as yet fail to mandate resource disclosures, minimise environmental impacts or incorporate adequate community consultation.
- Data centres contribute significantly to environmental degradation and subsequent harm to human health, including:
    - high greenhouse gas emissions and associated climate impacts from high energy use
    - high water demand for cooling
    - air pollution from back up diesel or gas generators
    - delaying the energy transition to renewables
    - contributing to urban heat
    - noise pollution
    - large land footprints of data centres and their associated energy infrastructure
    - waste pollution, particularly from salty water and e-waste.

Recommendations

DEA recommends a **moratorium on data centre approvals** until impacts can be properly regulated and minimised.

Standards governing data centre approvals should cover:

- **mandatory transparency and accountability**: enforce strict, verified public disclosures regarding energy, water, land use, carbon and other emissions, and impact on the transition to renewable energy generation
- **genuinely additional energy supply**: require 100% renewable energy supply with storage, matched to consumption on an hourly rather than annual basis, so that a facility does not draw on fossil fuel generation when renewables are unavailable.
- **not prolonging energy generation from fossil fuels**: either through extending the operation of existing fossil fuel generation or inducing new capacity. Require all proposals exceeding 100 megawatts to undergo rigorous independent review of their effect on scheduled coal-fired power station closures and on new fossil gas generation, assessed cumulatively across the region rather than by individual proposals.
- **efficient use of resources**: require the adoption of circular economy models for resource use and waste management
- **advanced cooling and limits on water usage**: require operators to adopt efficient hardware and closed loop or immersion-cooling systems that minimise water usage
- **noise and air pollution control**: establish enforceable standards for noise and air pollution, including appropriate setbacks from residences, caps on diesel power generation and minimum standards for diesel exhausts that reflect the best available pollution control technology
- **fair and sufficient payment** for resources and infrastructure used
- **quality community engagement**: require honest information about potential risks and benefits to the local and wider community and free, prior and informed consent from First Nations peoples.

In detail

DEA has grave concerns about the potential environmental harm and, in turn, the harm to human health posed by rapid expansion of artificial intelligence (AI) data centres across Australia. AI promises great economic and other benefits, but also presents significant risks.[1–3]

Notably, poor planning and regulation of the data centres, upon which AI relies, pose significant ecological risks for the communities that accommodate them and for Australia as a whole. Unless these risks are identified and addressed, the environmental, public health and societal impacts of AI risk will grossly outweigh the benefits it offers.

Effectiveness of existing regulatory frameworks

The emerging, rapid growth of infrastructure driven by global technology corporations largely lacks adequate oversight. Existing regulatory frameworks are struggling to catch up with the speed of the expansion of this sector, and as yet fail to mandate sufficient resource disclosures or adequate community consultation.[3–9] Emissions data from these technology corporations and their data centres is self-reported, which likely leads to significant underreporting.[10]

Environmental and health impacts of data centres

Water

Data centres are notoriously high users of water – by 2030, data centre water usage is anticipated to be 9.3 trillion litres globally.[4,11] Computer servers rely on water-intensive cooling systems, which puts strain on water reserves needed for residents and other industries in drought-prone regions. In addition, data centres draw heavily from groundwater aquifers, threatening agriculture and drinking water.[12] Cooling processes can also result in the loss of fresh water by evaporation and the discharge of waste water with elevated salt concentrations, placing pressure on local water and waste water systems.

However, closed loop cooling is feasible and has been adopted by some large scale data centre operators, saving many gigalitres of water per year compared to older cooling methods.[13] Closed loop cooling should be regarded as the industry standard and planning processes should reject data centres that would consume large quantities of water.

Proper regulation of data centres must include limits on water use, not just water efficiency standards.

Carbon footprint and climate change

Climate change is a current and future threat to human health with the potential to undermine the last 50 years of improvements in health.[14] The relationship between human health and global heating is summarised in the DEA resource 'How climate change affects your health: the facts'.[15]

The surging and constant energy demand from data centres risks delaying the transition to renewable energy by prolonging polluting coal and gas generation. A data centre that is proposed to use 100% **net** renewable energy means they will contract wind and solar electricity that is equal across the year to their energy use. This means that at times when wind and solar are unavailable, they may be purchasing coal-fired electricity at times of high prices, improving the economics and extending the life of ageing, heavily polluting coal-fired generators.

Large gas-fired generation plants are also proposed to power new data centres in Australia. For example, in Moss Vale, a 673 megawatt-capacity gas-fired power station has been proposed to help meet the electricity needs of the nearby Southern Highlands Data Campus.[16] Its capacity is so large that it is one of the largest gas plants proposed in both New South Wales and Australia – the next largest is proposed for nearby Marulan, intensifying the impact on the local community.[17,18] In the Northern Territory, the 76 terajoules of daily fossil gas use for the proposed Project Ares data centre would be higher than the 66 terajoules used by all domestic and other businesses in the Territory. The project is being used to ensure demand for gas fracked from the Beetaloo Basin.[19]

Data centre electricity usage in Australia is currently projected to increase sevenfold over the next decade to 10% of operational demand. However, international experience of mature data centres has shown projections of around 50% of their network capacity, with load being mostly continuously distributed throughout day.[20(p6)] As has occurred in other countries,[21] energy demand from proposed data centres is so large that it would be likely to extend Australia's dependence on fossil fuels and with it their air and climate pollution.[22]

Even without high data centre demand, insufficient availability of new renewable energy supply has delayed closure of NSW's ageing Eraring coal-fired power station from 2027 to 2029.[23,24] Regardless of whether data centres stimulate new investment in renewable energy, if their high energy demand delays coal closure or stimulates building of further gas power plants, they would cause additional, unnecessary environmental harm. To protect energy transition timelines, all data centre proposals exceeding 100 megawatts require rigorous review regarding potential delays to coal-fired power station closures.

Air pollution

In addition to the pollution associated with coal or gas-fired power, data centre plans frequently include backup diesel generators, which emit toxic air pollutants, along with large quantities of stored diesel itself.[25,26] Diesel exhaust contains high concentrations of pollutants like ultra fine particles and substantial amounts of nitrogen dioxide.[27(pp39-40)] It is classified by the World Health Organization's International Agency for Research on Cancer as a Group 1 (definite) carcinogen, with links to both lung and bladder cancer.[27,28]

There is no threshold for the health impacts and any increased exposure to fine particle pollution causes health damage;[29–31] consequently there is no justification for building new, large sources of air pollution in residential areas.

New data centres that burn diesel should be required to use the best available control technology for pollutants, including oxides of nitrogen and particulate matter. Caps on annual diesel usage should be used for emissions modelling, rather than assuming emergency use only, and these limits should be monitored and enforced.

In addition, any diesel generation must be clearly limited to power supply interruptions to the plant and scheduled testing, rather than back-up supply to the grid.[32] Notably, peak demand on the grid occurs on the hottest days, when heat is already stressing human health[33] and photochemical smog formation is most favoured.[34,35] Emergency plant is sited close to homes to be close to the load it serves – allowing this to be used for routinely dispatched combustion generation would magnify harms to health. Exemptions to environmental regulations for clean air that were written for emergencies should not be extended to ordinary operation of facilities.[36]

Urban heat island effect

The hard surfaces, dense development, size and lack of green canopy in cities create urban heat islands, making them significantly hotter than surrounding areas.[37] Global heating is causing cities to become even hotter, exacerbating heatwaves and the illness and death that they cause. Data centres located in cities can worsen these effects by releasing heat from their cooling systems. Western Sydney, the proposed location of several data centres, already suffers substantial heat island effects – for example, on the 4th January 2020, Penrith was the hottest place on earth at 48.9 °C.[38,39]

Noise

Data centre cooling and power supply systems can generate constant noise, which should be remedied by adequate set-back from residential areas and better design of cooling systems. Noise exposure, especially at night, is associated with worse health and impaired sleep.[40] Wind farms in NSW must meet a noise standard of 35 dB(A) at any residence,[41] and the noise standard for data centres should be lower than this. This is because wind farm noise is a necessary part of the turbine interaction with air, while data centre noise is from careless design of cooling systems.

Waste and pollution

In addition to the salty water that can be discharged from data centres, the facilities have the potential to produce large volumes of e-waste due to the fast hardware turnaround times triggered by high computing requirements. Current waste projections indicate that data centres will generate up to 2.5 million tonnes of e-waste annually by 2030.[4,11] Hardware obsolescence and the linear economy associated with computing components both contribute to this problem, which must be addressed in all data centre proposals.

Land use

Land use and site selection for AI data centres and their associated power infrastructure can significantly impact the local environment, with harm often falling disproportionately on less privileged communities. The land footprint of electricity generation for AI varies substantially by location and electricity supply mix, whether coal, fossil gas, solar, wind or hydroelectricity. Assessing the sustainability of data centre infrastructure developments through a single metric such as land use burden, water requirements or air pollution, risks hiding these trade-offs and shifting burdens onto communities already under land or water stress. This can create an asymmetry where local communities absorb the environmental costs while AI's strategic and economic benefits flow elsewhere, often to offshore corporations. The interplay between land use, water consumption and energy production for data centres warrants transparent assessment and design.[2,22]

Socioeconomic and community harm

To date, while creating initial job opportunities in the construction phase, data centre projects in Australia and elsewhere have contributed little to ongoing employment long term,[42] and the bulk of profits flow offshore.[43–45] While these projects could serve as an opportunity to invest in training and upskilling of key Australian workers, if inadequately planned, skilled construction and technical workers will be diverted away from other national priorities, like the energy transition and housing.[46]

Globally, data centres are disproportionately located in areas – often rural or regional – that already have localised air, water and land pollution from other industries, like coal-fired power stations, mining and agriculture.[2,47,48] These areas often already have poorer human health and socioeconomic outcomes.[2] In Australia, most data centres are planned for areas of Sydney and Melbourne that already suffer similar issues of pollution and socioeconomic disadvantage.[47,49–52]

Communities that host data centres derive little in the way of long-term benefit from them. The facilities provide very few ongoing jobs[53,54] and result in a significant loss of amenity for communities, as well as local impacts from air pollution, usage of scarce water resources and the urban heat island effect.[2,55–58] In addition,

increased dependence on fossil fuels due to the large energy usage of data centres can further expose communities to high energy costs from volatile international fossil fuel markets.[21]

Historically, Australia has poorly structured taxation of fossil fuel projects, including coal mines and natural gas extraction.[59,60] This has advantaged foreign multinational corporations, with profits often moved overseas at the expense of the Australian economy and the health of all. Similarly, the technology companies who use the data centre capacity are primarily large multinational corporations which are unlikely to significantly contribute to the local or Australian economy.[44]

Genuine, high quality community consultation that includes accurate information is vital to any development proposal, rather than promises of illusory economic benefits and fast-tracking of approvals.[22] In addition, free, prior and informed consent from First Nations people is necessary, in line with Australia's obligations under the United Nations Declaration on the Rights of Indigenous People.[61,62]

Any approvals should be contingent on fair profit and benefit sharing with the local and Australian communities who host facilities and ensure a fairer distribution of any economic benefits.[2,22,63]

A rushed, poorly planned, adoption of large data centres in Australia and globally poses unacceptable risks to people and the environment on which we depend for the most basic requirements of health.[2,22]

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