

EUDCA feedback – Water Resilience Strategy

The EUDCA takes note of the European Commission's willingness to address the management of water resources in Europe and the emerging issues linked to water scarcity.

1. ICT industry and water usage

- **Water usage in the ICT industry**

The EUDCA would like to highlight how water resources are efficiently managed within the ICT industry, and particularly in data centres. The data available for the ICT industry suggests that data centres account for a marginal part of the water used in Europe.

For example, in the Netherlands, the ICT industry represents 0.08% of water used, one of the smallest sectors in the country, according to the Central Bureau of Statistics.

For France the available figures¹ paint a similar picture: in 2020, 482,000 m³ of water was withdrawn for data centres, compared to a total of 30 billion, and 3.3 billion for agriculture only. Data centres therefore represented 0.0016%. If we also add indirect consumption of water by data centres (e.g.: water used for electricity generation), the final figure is 5 million m³ of water consumed for a total of 4.4 billion (i.e. 0.11%).

- **How the industry addresses the issue**

The EUDCA is a founding member of the CNDP (Climate Neutral Data Centre Pact), an industry-led initiative whose signatories represent around 80% of the data centre market in Europe. The European Commission (DG CNECT) is associated with this initiative and regularly reviews the progress of the CNDP. Signatories of the CNDP have pledged to reach measurable KPIs in terms of sustainability of their operations², including on their water usage. CNDP members have adopted the following Water Usage Effectiveness (WUE) targets:

- By January 1, 2025, new data centres at full capacity in cool climates that

¹ Data available here: [Vie-publique.fr](https://www.vie-publique.fr) and [Arcep](https://www.arcep.fr) report pp.60-61

² Commitments of the Climate Neutral Data Centre Pact are available [here](#)

use potable water will be designed to meet a maximum WUE of 0.4 L/kWh in areas with water stress.

- The limit for WUE can be modified based on climate, stress and water type to encourage the use of sustainable water sources for cooling.
- By December 31, 2040, existing data centres that replace a cooling system will meet the WUE target applied to new data centres.

The data centre industry has proactively been addressing the issues of water scarcity and water stress, to ensure that water is properly managed.

2. Policy recommendations

- **Existing policy requirements related to water**

The EUDCA would like to stress that under the Energy Efficiency Directive (EED) and the reporting scheme for data centres, data centre operators are obliged to report their water use per data centre every year, which is translated into a KPI for Water Usage Effectiveness (WUE). Therefore, the industry is already committed to transparency and reporting requirements by EU legislation.

- **Upcoming requirements**

The European Commission (DG ENER) is already studying further measures to be implemented as a follow up to this reporting exercise, which could include rating scheme for data centres and possible minimum performance standards. We call on the European Commission, with the utmost urgency and in the strongest terms, to refrain from introducing other water-related requirements on the data centre industry, such as through a general water efficiency target for instance.

If efficiency targets are set, industry-set targets and best practices, such as those outlined in the Pact should be considered. This approach ensures broad industry endorsement, as the Pact already covers a significant portion of data centres in Europe.

- **The European data centre community needs to remain competitive**

Data centre operators must already comply with new regulatory requirements stemming from EU policy, and more is coming: both under the leadership of DG ENER, and under the leadership of DG CNECT (e.g.: Cloud and AI Development Act).

We ask the Commission, and in particular DG ENV, to refrain from adding another regulatory constraint on the industry, which is already committed to the highest standards of sustainability and resource efficiency. The fragmented nature of EU policymaking hinders the achievement of policy goals and undermines the competitiveness of various sectors.

Introducing additional measures will place increased pressure on the industry, which could negatively impact the competitiveness of the sector in the EU. Over-regulation may lead to higher operational costs and increased complexity for data centre operators. This, in turn, could discourage investment and innovation within the sector, making it more difficult for EU-based data centres to compete on a global scale. Furthermore, excessive regulatory burdens might drive businesses to relocate their operations to regions with more favorable regulatory environments, ultimately undermining the EU's position in the global digital economy.

About EUDCA

The European Data Centre Association (EUDCA) represents the interests of the European data centre community. Established in 2011, the EUDCA is the voice of the industry, with a diverse membership which includes European and international data centre operators, equipment suppliers, and a network of national trade associations.

Our policies and initiatives are consistently centred around data centre operators, both in defining the data centre of the future and in regulating markets.

The EUDCA has been at the forefront of the energy transition efforts of the data centre industry. As co-founder of the Climate Neutral Data Centre Pact, the EUDCA is deeply committed to taking the industry on the road to climate neutrality by 2030. As the voice of the industry, we call on European policymakers to help us realise this vision.

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