Friends of the Earth Scotland written evidence to the Scottish Parliamentary inquiry on hyperscale data centres

November 2026

About us

Friends of the Earth Scotland exists to campaign, with partners here and across the globe, for a just transition to a sustainable society. We are Scotland's leading environmental campaigning organisation; an independent Scottish charity with a network of thousands of supporters and active local groups across Scotland. We are also part of the largest grassroots environmental network in the world, uniting over two million supporters, 75 national member groups, and some 5,000 local activist groups.

Introduction

We welcome the opportunity to respond to the Climate Action Committee and the Economy, Energy and Tourism committees joint call for evidence.

Scotland currently has a legal responsibility to meet net zero by 2045. New construction and developments on the scale proposed by developers of hyperscale data centres will present a real danger to meeting these targets. The Climate Change Plan and Energy Strategies developed by the Scottish Government do not take account of these huge developments. The impact of even one of these hyperscale data centres will cause Scotland to be at serious risk of meeting its climate goals.

Decisions on developments of this size, which will have a hugely significant impact on the environmental and carbon goals of Scotland, should not be made without consultation with the public at large.

Below we set out in detail, our reasons for objecting to AI data centres.

1. **What are the potential environmental impacts of the construction and operation of hyperscale data centres and opportunities to deliver environmental benefits including:**
   - **water quality and consumption**
   - **air quality**
   - **nature and biodiversity, including soil quality.**
   - **noise pollution**
   - **energy use and reuse, and associated generation (including of back up generation)**
   - **emissions, and where emissions could be avoided by, for example, using waste heat.**
   - **temperature changes around hyperscale data centres**

Building even one of these AI data centres would have national level consequences for Scotland's energy systems and climate change plans. The cumulative impact of the current 23 proposals would be impossible for Scotland to bear. They could also have significant PFAS chemical, critical mineral and waste impacts but the lack of transparency on these impacts in developer plans means the scale of these impacts is unclear.

The pause on development decisions should be extended until the environmental, social and health impacts of data centres are properly understood and consulted on**. The Scottish Government must conduct an independent review of these impacts and then conduct a full national consultation to give people a free and fair say before it can create a national strategy on data centres.**

Energy Demand impacts

In 2024, Scotland used 26.5TWh of electricity. If all 23 current applications became operational, they would consume 80TWh of electricity, three times all other electricity used in Scotland[1]. Total electricity consumption for Scotland would therefore be around 105GWh, **four times the Scottish total in 2024**.

Over the coming decades, we will be using less fossil fuels and more electricity for heating and transport. The balanced options scenario in a study by ClimateXchange in 2022 suggested total electricity generation in 2030 would need to be 94TWh and in 2035 119TWh to meet these decarbonisation needs and contribute to decarbonisation in the rest of the UK[2]. During this time, Torness nuclear power station will close in 2028, so renewable energy developments and storage solutions will need to increase to replace the power it contributed and meet the increasing demands for electrifying heating and transport, hence the 2030 total in the ClimateXchange scenario.

[1] Calculated from APRS estimate of total capacity of 23 proposals (9100MW)

[2] Scottish Whole Energy System Scenarios, ClimateXchange, 2022, https://www.climatexchange.org.uk/wp-content/uploads/2023/09/cxc-scottish-whole-energy-system-scenarios-may-2022.pdf

However, if the 23 data centres currently seeking planning approval were built and operational by 2030, they would add around 80TWh of demand on top, **an additional 75% of new power required in just four years' time**. it is unlikely renewables could be expanded fast enough – much faster than currently planned – to meet this demand, the gap would have to filled by additional fossil fuel use or imported (high-carbon) electricity. For comparison, Scotland's only remaining gas-fired power station is at Peterhead and, if it were possible to run it at full capacity all day every day, it could theoretically produce 10TWh of electricity a year.

No allowance for the very large extra amount of power required to run data centres has been included in Scotland's energy strategy thinking to date. This means the extra power demanded by data centres is, likely to come from the burning of fossil fuels, either in Scotland or elsewhere to make electricity which we will import. Even where data centres tie up power deals with energy companies to purchase renewable power, this just removes that power from the rest of market, still requiring high-carbon electricity to fill the gap.

The increasing use of high-carbon electricity in Scotland will be disastrous for efforts to meet our climate budgets and targets. In the longer term it is possible the growth in renewables will be enough to meet the needs of data centres as well as the demands from electric heating and transport, but for now the mostly likely outcome is that Scotland will import more gas-fired electricity and burn more gas at Peterhead to feed the data centres.

Recommendations:

The Scottish Government's guidance should require that all EIA assessments use the current UK grid carbon intensity factor to estimate carbon impacts of developments.

The Scottish Government should extend the pause on AI data centre planning decisions until a full assessment of their impact on ability to meet its Climate Change plan commitments has been conducted.

Peak demand

Scotland's current peak energy demand is around 5GW and was expected to rise to 9GW by 2045 before data centres entered the picture[3]. If all 23 current applications were built and operating, they would create a further demand of 9.1GW. And because they are meant to run all day every day the new maximum peak would be over 14GW, rising to 18GW by 2045.

This means that **the electricity distribution network would be continuously carrying three times more power all the time than it does today, requiring upgrades, reinforcements, new infrastructure and additional maintenance, beyond that which is already planned to ensure full access to the grid for the expanding renewable energy sources.**

[3] Electricity system security of supply in Scotland, ClimateXchange, 2023, https://www.climatexchange.org.uk/publications/electricity-system-security-of-supply-in-scotland/

Heat

Heat is a valuable energy resource and used wherever possible. Scotland's National Planning Framework 4, policy 19(d) says: *"National and major developments that will generate waste or surplus heat and which are located in areas of heat demand, will be supported providing wider considerations, including residential amenity, are not adversely impacted. A Heat and Power Plan should demonstrate how energy recovered from the development will be used to produce electricity and heat."*

Neither the Larbert nor the Chapelcross EIA includes a heat and power plan. It seems the current proposals could be fully operational before heat reuse opportunities could be realised. So, **there is insufficient information on whether and how heat might be used for the planning authority to judge whether these are good proposals or not, that is, whether or not they comply with NPF4 policy 19(d).**

Recommendation:

The Scottish Government's Guidance should include a requirement for EIAs to include a full heat and power plan.

The Scottish Government's Guidance should include a requirement that any data centre developments in Scotland are required to have a working heat network from day one of operation.

Diesel back-up generators

The Chapelcross applicants (and some others) propose that their generators would run on vegetable-derived fuel, claiming the CO_2 would be largely carbon-neutral in terms of its contribution to climate change. However, it is not clear that there is enough of this fuel available, with Argent Energy closing their large plant at Motherwell in 2024 and no certainty over the Project Willow proposals for Grangemouth. It is also not clear whether future operators of the data centres could be held to this commitment.

Approximately, if all 23 proposed hyperscale data centres were built and each one suffered one 48-hour power outage a year the resulting annual CO_2 emissions would be 420,000tCO_2, roughly equivalent to running an extra 210,000 average fossil-fuelled cars for a year or an additional 1.1% of Scotland's emissions in 2024.

Water and PFAS

Most of the applications in Scotland expect to use a closed loop water system. This would use less water than an open loop system but would require the use of PFAS, also known as forever chemicals, in their liquid cooling systems.

PFAS are manufactured chemicals that are widespread and persistent. Their impacts are profound. They are carcinogenic, and linked to developmental, hormonal, and reproductive diseases. There are many sources of PFAS pollution, and they have been polluting our environment for decades.

Neither the Larbert nor the Chapelcross EIAs mentions PFAS or give details on managing leaks or treatment of water which may contain PFAS.

PFAS are regulated under the Environmental Authorisation Scotland Regulations and authorisation is required to discharge PFAS substances to the water environment. SEPA has recently begun monitoring of PFAS at a national scale and found it at 90% of sites tested.

This is an emerging public health crisis which Scotland is only beginning to understand. PFAs are likely to already be costing people their health and the NHS millions of pounds every year.

There is a risk that **AI Data Centres with closed loop water systems could worsen this if the opportunity to manage PFAS is not taken.** There are alternatives to using PFAS for cooling but there is no detail on what is actually proposed at Chapelcross or Larbert and PFAS manufacturers are gearing up for a big boost in sales as cooling loads increase.[4, 5]

Without knowing if PFAS will be used in cooling it is impossible for planning authorities to weigh up the risks.

Recommendations:

The Scottish Government's Guidance should include a requirement for EIAs to minimise and mitigate the use of PFAS substances in data centres.
Data centre operators must be required to monitor and report PFAS use, including leaks and discharge.

Material use and E-waste

AI data centres would create huge demand for critical minerals, such as copper and nickel. These materials are needed for a just energy transition but are linked to serious and extensive human rights abuses and environmental damage globally. Their use in AI data centres would lock Scotland into a **new level of unsustainable demand,** at odds with the Scottish Government's recently published **Circular Economy strategy** which recognises the need to "reduce dependence on international supply chains for Critical Raw Materials." [6]

Because AI data centres are on all the time, they burn through servers quickly, generating huge volumes of e-waste and requiring frequent replacement with new materials.

[4] Data centres don't need PFAS cooling systems, ChemSec, 2026, https://chemsec.org/data-centres-dont-need-pfas-cooling-systems/

[5] Tidal wave' of Pfas being launched to satisfy AI industry, campaigners warn, Guardian, 2026, https://www.theguardian.com/environment/2026/sep/14/pfas-firms-tidal-wave-forever-chemicals-ai-industry-demand-datacentres

[6] Scottish Government (2026) A Circular Economy Strategy for Scotland - gov.scot

Waste management is likely to be difficult because of potential PFAS contamination and heavy use makes reuse or high-grade recycling impossible.
The Scottish Government is preparing to **consult on statutory Circular Economy targets soon**.
We estimate that data centres could create 19,000t of additional waste – Scottish levels of e-waste in 2023 were 49,000t according to SEPA. An increase of almost 40%.

Recommendations:

The committee should suggest that the Scottish Government's guidance requires all EIAs to estimate:

- how much critical minerals (as defined in the UK Critical mineral Strategy) they will demand over the lifetime of their projects
- where these critical minerals will come from
- how critical mineral use can be minimised
- how crucial mineral use will comply with the human rights and environmental due diligence considerations set out in the Circular Economy (Scotland) Act 2024
- how much e-waste the data centre will generate over its lifetime
- how e-waste will be minimised and mitigated

Recommendation: The Scottish Government should extend the pause on AI data centre planning decisions until a full assessment of their impact on ability to meet its Circular Economy (Scotland) Act and Circular Economy Strategy commitments has been conducted.

2. What systems are, or should be, in place to support avoidance or mitigation of negative environmental impacts?

The AI data centres proposed in Scotland are, by nature, large and energy hungry developments. To a large extent, their impacts cannot be mitigated. Allowing even the smallest of these AI data centres to be built would have national level impacts. **The most impactful way of avoiding negative impacts is to ensure that we do not build more data centres than we need in Scotland.**

The current planning framework is not fit for purpose. It is not set up to deal with AI data centres – that is why we have already seen two major interventions from the Scottish Government on this matter already. LAs are being asked to decide on 1 or 2 proposals but the cumulative impact of these 23 Data Centres on energy and climate grounds would be impossible for Scotland to bear. It would be reckless of the Scottish Government to continue in its current approach of encouraging market-led AI data centre development in Scotland without much strong social and environmental safeguards in place.

There are several steps that must be taken to ensure AI data centre impacts in Scotland are mitigated properly:

- Firstly, **extend the pause on all planning decisions** on AI data centres in Scotland until a national strategy is in place.

- Next, the Scottish Government must conduct an **independent review** to understand the environmental impacts of data centres properly. Only two of the 23 proposals have published an EIA to date, and these are incomplete and underestimate important impacts, including climate impacts. The independent review must cover:
  - The cumulative carbon impacts of AI data centre proposals using the current UK grid intensity factor.
  - The need to minimise and mitigate use of PFAS in liquid cooling systems.
  - The benefits of a requirement to utilise waste heat from day one of operations.
  - The human rights and environmental impacts of the use of critical minerals
  - The need to manage e-waste in line with the waste hierarchy.

- Once the independent review is complete, the Scottish Government must **consult the people of Scotland** on its plans for AI data centres. In their consultation, the Scottish Government must set out its case for why it believes AI data centres are needed in Scotland and where they should be located. They should state what the impacts will be and who will be expected to bear them. They should explain how they will prevent household energy bills rising because of AI data centres, the impact on Scotland's Climate Change Plan and Circular Economy Strategy.

- Only once this process has been completed, should the Scottish Government create a **national strategy** based on the findings of the independent review and national consultation.

3. What can Scotland learn from other countries on the environmental impacts of hyperscale data centres?

The USA has imposed AI data centre developments on people for longer and at greater scale than any other country. Scotland can learn lessons from this experience:

- There has been a huge, **nationwide backlash** from communities who feel data centres have been imposed on them unfairly. The failure to involve communities properly is a missed opportunity to understand the local impacts of these developments from the people who understand the local area best.

- The **long-term health impacts** of data centres on health are becoming clearer. The British Medical Journal says: "unrelenting noise disrupts sleep, affects mental health and cognitive functioning, and lead to overall poorer quality of life and wellbeing."[7] The harms of data centres are having a massive public health cost. One study estimates the public health burden of data centres in the US will be $20 billion in 2028[8]. This includes increases in additional deaths, more hospital visits and asthma attacks.

- In the **absence of robust and consistent standards**, tech companies have been willing to trade public health and wellbeing to increase their own profits. It is these same tech companies who are driving AI data centre growth in Scotland. If nothing changes, Scotland is facing a future where data centres increase inequality and cause mounting health and environmental costs that last for decades.

In Ireland, data centres have pushed up energy bills and destabilised the grid.[9] Households in Ireland paid an estimated €715 million more in electricity bills between 2015 and 2023 due to the rapid expansion of data centres in the country. By 2027 data centres are expected to use more electricity than all the households in Ireland.
In Ireland, between 2017 and 2023 all additional wind generation created was absorbed by the growth of data centres – so bringing new renewables onstream did not reduce the need for fossil fuels.

Data centres use 23% of national energy supply in Ireland. At 1000MW, the Chapelcross proposal would use more energy than all of Ireland's current 107 data centres and represent 25% of Scotland's electricity supply. Norway is also known as a data centre pioneer, but they only use 2% of the country's electricity. Germany is Europe's leading country for data centres with over 2000 of them, but they only use 4% of the country's power.

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[7] Data centres: Tech companies are putting health and the environment at risk by exploiting regulatory gaps | The BMJ
[8] Health-Informed Computing: Estimating and Addressing the Public Health Impact of Data Centers
[9] The cost of data centre growth in Ireland: Households paid an estimated €715 million more in electricity bills | Friends of the Earth

Just one big development would see Scotland in danger of running into the same problems as Ireland where new renewable energy development cannot outstrip the increasing power demands of data centres.

Table 1. Comparison of proportion of national energy supply used by data centres

Country	**% current national supply**
Norway	2%
Germany	4%
Ireland	23%
Scotland - Chapelcross proposal	25%
Scotland - all 23 proposals	400%

Industry is trying to foist upon Scotland a level of development unprecedented in any other country.

Recommendation: The Scottish Government should:
- Involve the people of Scotland in the AI data centre decision by consulting community groups in the development of its guidance and conducting a national consultation on AI data centres in Scotland.
- Estimate the public health costs of AI data centre development in Scotland

4. How building and running hyperscale data centres in Scotland might impact on achieving climate and nature goals?

Large data centres were not included in the modelling that created the carbon budgets for the Scottish Climate Change Plan.[10] For instance, there is no mention of data centres in the sectoral annex of the Plan[11] nor in the recommended carbon budgets from the Committee on Climate Change.[12] Thus, any construction of large data centres makes it harder to meet the Scottish carbon budgets and reach the legal target of having net-zero emissions by 2045.

The Chapelcross EIA estimates that average annual domestic emissions will be 75 ktCO2e per year. However, this assumes a rapid growth in renewable energy. AI Data centres will create additional demand for power that is most likely to be met by fossil fuels, therefore it is more accurate to use the current UK grid carbon intensity factor to estimate their carbon impact than assume 100% renewable supply. When this is done, the annual impact from Chapelcross jumps to 1.55MtCO_2e a year, which would add 4% to today's Scottish annual emissions.[13] **This is almost as large as the emissions from the whole of the NHS in Scotland.[14]**

If all 23 application went forward total emissions would be around 14MtCO_2e a year, an increase of 36% on Scotland's 2024 total emissions – at a time when we are supposed to be reducing emissions by several per cent a year. Data centres would become the largest single sector of emissions for the Scottish economy.

Scotland's total carbon budget between 2026 and 2045 is 406MtCO_2e, spread across four five-year budgets. **In the worst case, where data centres caused the reduction in grid carbon**

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[10] Scotland's Climate Change Plan: 2026-2040, Scottish Government, 2026, https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2026/03/scotlands-climate-change-plan-2026-2040-annexes/documents/scotlands-climate-change-plan-2026-2040/scotlands-climate-change-plan-2026-2040/govscot%3Adocument/scotlands-climate-change-plan-2026-2040.pdf

[11] Climate Change Plan Annex 2 – Sectoral Annexes, Scottish Government, 2026, https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2026/03/scotlands-climate-change-plan-2026-2040-annexes/documents/scotlands-climate-change-plan-annex-2-sectoral-annexes/scotlands-climate-change-plan-annex-2-sectoral-annexes/govscot%3Adocument/scotlands-climate-change-plan-annex-2-sectoral-annexes.pdf

[12] Scotland's Carbon Budgets, Committee on Climate Change, 2025, https://www.theccc.org.uk/wp-content/uploads/2025/05/Scotlands-Carbon-Budgets-2.pdf

[13] Scottish greenhouse gas statistics 2024, Scottish Govt, 2026, https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2026/06/scottish-greenhouse-gas-statistics-2024/documents/scottish-greenhouse-gas-statistics-2024/scottish-greenhouse-gas-statistics-2024/govscot%3Adocument/Scottish%2BGreenhouse%2BGas%2BStatistics%2B2024.pdf

[14] NHS Scotland Climate Emergency and Sustainability Annual Report 2025, Scottish Government, 2025, https://www.gov.scot/binaries/content/documents/govscot/publications/corporate-report/2025/12/nhs-scotland-climate-emergency-sustainability-annual-report-2025/documents/nhs-scotland-climate-emergency-sustainability-annual-report-2025/nhs-scotland-climate-emergency-sustainability-annual-report-2025/govscot%3Adocument/nhs-scotland-climate-emergency-sustainability-annual-report-2025.pdf

intensity to stall, total data centre emissions from 2030 to 2045 would be 208MtCO_2e, using up more than half of Scotland's total carbon budget.

5. **What criteria should a hyperscale data centre meet in order to be considered "green"?**

AI data centres cannot ever be considered "green" or sustainable. They are, by nature, large and energy hungry developments. To a large extent, their impacts cannot be mitigated. Even if AI data centres were run off 100% additional renewables, the increase in demand for renewables to feed unnecessary AI is unsustainable.

There are no benefits to Scotland that would compensate for the permanent harms of AI data centres being allowed to be developed in this way here.
If the Scottish Parliament and Government decides to allow AI data centre developments to go ahead in Scotland this is a choice to put business self-interest before people, climate, and nature.

6. **What are the potential impacts of data centre development on Scotland's economy, including:**
   - **jobs**
   - **investment**
   - **supply chains**
   - **tax revenues**
   - **attracting business to locate in Scotland**
   - **the extent to which any economic benefits can be retained in Scotland?**

Jobs

AI data centres will not provide as many jobs as developers claim. The green group, Verdant, claims that existing UK data centres support roughly 4,400 direct jobs, not the 24,300 claimed by industry. Applying the same evidence to planned developments suggests around 10,400 total direct jobs across the whole of the UK - about a quarter of the industry's projected 40,200.[15]

Investment

The ownership of AI data centres located in Scotland is expected to be almost all constructed from private equity, which effectively means more overseas ownership of the Scottish economy and a redirection of enormous amounts of national resources into an industry with no domestic supply chains and no physical outputs. In Ireland, 94% of Irelands computer service exports was from foreign owned firms.

There are also numerous concerns raised that AI investment is a bubble that is about to burst and that some AI investment plans are not real.[16] It would be terrible for Scotland if many large scale, resource intensive, polluting developments were built and then abandoned down the line.

A report on the data centre expansion in Ireland by leading independent academics found that it had resulted in widespread costs and a disproportionate drain on public resources.[17] The report states: "The economic contributions of data centres to the Irish economy are exaggerated, with headline figures failing to account for where value accrues and who benefits from it. The development of data centres in Ireland represents a key means through which the "costs" of industrial development are socialised and its benefits privatised, especially in the context of energy transition."

The report found that nearly 50,000 homes could have been built between 2019-2024 with the capital invested in data centres. This is the opportunity cost of misallocated construction

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[15] The Jobs Mirage of Data Centres: Minimal employment, maximal resource demand — Verdant

[16] Revealed: UK's multibillion AI drive is built on 'phantom investments' | AI (artificial intelligence) | The Guardian and AI mania can't survive higher interest rates

[17] MUSSI working paper 31.pdf

industry capacity to build out the infrastructure of tech giants. On average over the seven-year period 2019-2025, final demand committed to the buildout of data centre infrastructure in Ireland could have created and sustained 20,490 jobs in the education sector, 12,657 jobs in the health service, or 25,484 jobs in social work-related activities.

Supply chains

AI data centres will create demand for critical raw minerals, such as copper and lithium. These are needed for the energy transition to heat people's homes and decarbonise our existing transport and industry. The supply chains for these critical minerals are linked to extensive and serious human rights abuses and environmental damage.[18] AI data centres could create additional unnecessary demand for critical raw minerals in Scotland.

Retaining benefits in Scotland

Developers in Scotland have made it clear that US tech companies will be the eventual owners of Scottish AI data centres.[19] The US CLOUD Act (Clarifying Lawful Overseas Use of Data Act) allows United States law enforcement to compel U.S.-based technology and cloud companies to turn over data—including AI training data, user prompts, and outputs—regardless of whether the physical data centre is located inside or outside the U.S. This means AI data centres in Scotland would be owned by American companies such as Google, Microsoft and Meta and these companies would have ultimate control and access to the data they store.

Recommendation:
The Scottish Government should state clearly how it is going to ensure that the people of Scotland have access, control, and use of any of their data which is stored on Scottish AI data centres.

[18] Unearthing Injustice: A global approach to transition materials - Friends of the Earth Scotland

[19] Data centre heat could revive Scottish fruit growing | The Herald

7. **What impacts could increased data centre development have on Scotland's energy system, including:**
   - **electricity demand**
   - **electricity generation**
   - **network infrastructure**
   - **utilisation of waste heat**
   - **utitlisation of curtailed renewable electricity**
   - **overall network balancing?**

Electricity demand and generation

See answers to question 1 and 2 above.

Network infrastructure

Building data centres in Scotland would put additional strain on the electricity grid. Scotland's current peak energy demand is around 5GW and was expected to rise to 9GW by 2045 before data centres entered the picture. This means there must be 5GW of generating capacity available when demand is going to be high. If all 23 current applications were built and operating, they would create a further continuous demand of 9.1GW, so the new maximum peak would be over 14GW, rising to 18GW by 2045. Initially, that is 14 GW of capacity ready to run at any time, 2.8 times the capacity needed to meet today's peak.

This also means that the electricity distribution network would be continuously carrying 3 times more power all the time than it does today, requiring upgrades, reinforcements, new infrastructure and additional maintenance, beyond that which is already planned to ensure full access to the grid for the expanding renewable energy sources.

Curtailment charges are a red herring

Developers are interested in Scotland because they would like to use our renewable energy, particularly that energy which cannot always be used. However, there are two reasons why this will not be possible. Firstly, most wind power is generated intermittently in the Highlands. AI data centres would be located in the south of Scotland and require constant energy use, so there is a mismatch between supply and demand. Secondly, the there are plans to build six new interconnectors between Scotland and England, which will largely eliminate the current curtailment issues. The first two of these are due to be operating in 2029.

So, by the time any hyperscale data centres start operating it seems likely that there will be little to no curtailed renewable energy for them to mop up.

Use of waste heat

See answer to questions 1 and 2 above.

8. **What actions should be taken to ensure that the economic and energy implications of data centre development in Scotland are appropriately assessed, planned for and managed at a pace that reflects the rapid growth of AI and demand for digital infrastructure?**

There are several steps that must be taken to ensure AI data centre impacts in Scotland are mitigated properly:

- **Firstly, extend the pause on all planning decisions on AI data centres in Scotland until a national strategy is in place.**

- Next, the Scottish Government must conduct an **independent review** to understand the environmental impacts of data centres properly. Only two of the 23 proposals have published an EIA to date, and these are incomplete and underestimate important impacts, including climate impacts. The independent review must cover:
  - The cumulative carbon impacts of AI data centre proposals using the current UK grid intensity factor.
  - The need to minimise and mitigate use of PFAS in liquid cooling systems.
  - The benefits of a requirement to utilise waste heat from day one of operations.
  - The human rights and environmental impacts of the use of critical minerals
  - The need to manage e-waste in line with the waste hierarchy.

- Once the independent review is complete, **the Scottish Government must consult the people of Scotland on its plans for AI data centres.** In their consultation, the Scottish Government must set out its case for why it believes AI data centres are needed in Scotland, where they should be located. They should state what the impacts will be and who will be expected to bear them. They should explain how they will prevent household energy bills rising because of AI data centres, the impact on Scotland's Climate Change Plan and Circular Economy Strategy.

- Only once this process has been completed, should the Scottish Government create a **national strategy** based on the findings of the independent review and national consultation.

Conclusion

Clearly, even a single hyperscale data centre development would have national level impacts in Scotland and risks causes serious irreparable damage to our environment. These developments must not be pushed on communities who don't want them and are gravely concerned about the risks involved.

It is the opinion of Friends of the Earth Scotland that the Scottish Parliament must call on the Scottish Government to pause all data centre applications until a full-scale public consultation has taken place.