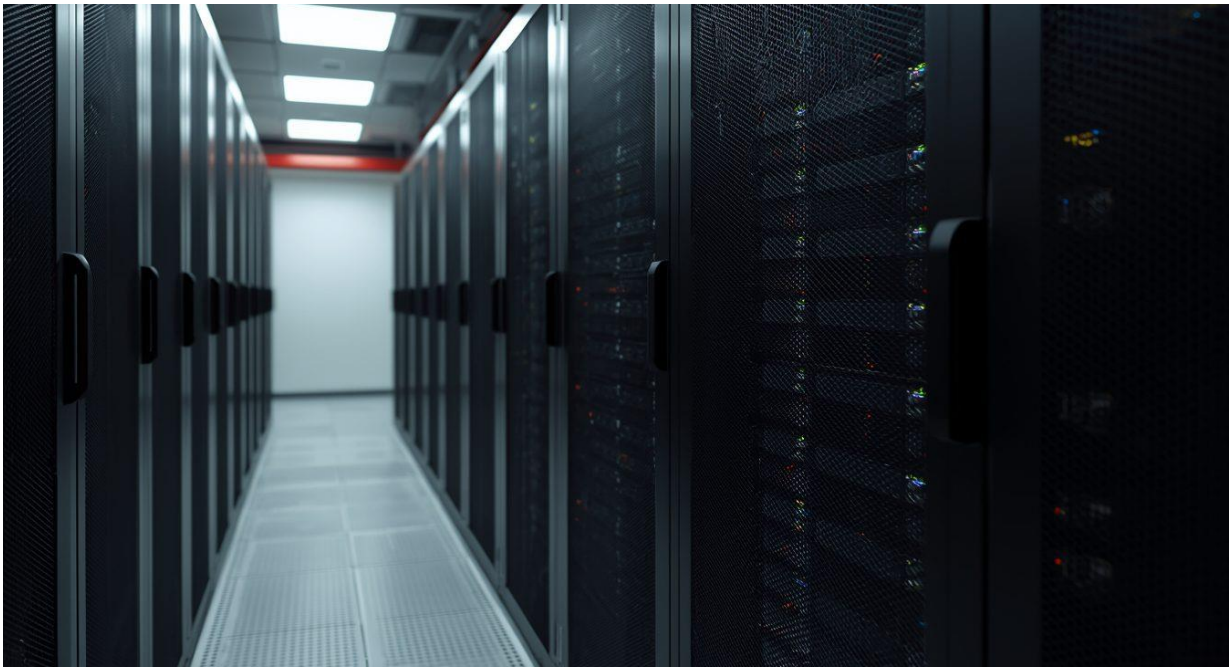

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Transparency about energy and water: why the data center sector has been on the brakes for ten years – and why it is no longer sustainable

With the growth of cloud and AI, the data center has definitively become a public infrastructure issue. Not only in terms of space and grid capacity, but especially in terms of energy and water impact. The reflex of the sector in the Netherlands over the past ten years has often been predictable: first put things into perspective with macro-statistics, then negotiate definitions and measurement methods, and only report as a last resort — when legislation is inevitable . The question is: why is that, what role do industry associations NLdigital and the Dutch Data Center Association (DDA) play, and to what extent do large (mostly American) players steer this behavior?

The "macro-cipher" strategy: from legitimation to delay

Anyone who follows the public communication of the sector sees a clear line: put the impact in perspective. For example, DDA publishes figures that emphasize the energy

and water share of data centers in the Netherlands. That is understandable: in the social debate, an image of "energy guzzlers" and "water consumers" quickly arises and then you want to nuance. (Dutch Data Center Association)

But in recent years, that perspective has become less and less sufficient. For example, CBS recently reported that the supply of electricity to data centers in 2024 amounted to 5.1 TWh, accounting for 4.6% of national electricity consumption. (Central Bureau of Statistics) That is no longer a marginal phenomenon; It is a visible part of the energy demand that you as a society want to be able to weigh administratively — especially in grid congestion and spatial planning.

The problem is: macro figures do not answer the core question of policy. Policymakers want to know: *which locations require which peak load? Which cooling method? Which water source? Which residual heat options? What energy flexibility?* Macro figures are fine for imaging, but insufficient for guidance.

EED reporting: the transparency obligation is there – but the data remains Swiss cheese

Since the European Energy Efficiency Directive (EED), there has been a concrete direction: large data centers must report energy efficiency and relevant indicators. In the Netherlands, this is explained via RVO; EED reporting aims at comparability and better policy planning. (RVO.nl)

At the same time, practice shows how difficult things are. Media reported at the end of 2025 that many data centers refuse to publish exact figures on water and power consumption or deliver crucial fields empty. (NU.nl) A recent analysis in the trade media also revealed that it is precisely in some of the largest (and often American) ownership that essential fields are missing. (Techzine.nl)

That is exactly the point at which "we are quite transparent" turns into "we are transparent as long as it doesn't really rub off".

Ten years of resistance: where does it come from?

The sector's resistance to far-reaching transparency and regulation has roughly four causes:

1. **Definitions and measurability** – PUE and WUE seem unambiguous, but in practice scope, measurement points, standardization and exceptions differ. The step from "internal optimization" to "externally comparable reporting" is a big one. Government documents on sustainable digitalisation also explicitly point to the need for consistent data definitions and the discussion around indicators and emission factors. (open.overheid.nl)
2. **Competition and contracts -** Energy procurement structures, PPAs, load profiles, redundancy and cooling design are sensitive to competition. Moreover,

data centers are often part of international chains (hyperscale, colocation, managed services) where contracts limit disclosure.

3. **Regulatory stacking and precedent -** As soon as you give figures at the location level, "benchmark politics" arises: municipalities and provinces want conditions; grid operators want prioritization; activists want naming-and-shaming. Part of the sector fears that transparency will immediately be translated into limitations, without nuance about value creation.
4. **Reputational and geopolitical sensitivity** - Especially with hyperscalers, transparency is not a purely technical issue, but a reputational and geopolitical issue. In Europe, "sovereignty" has become a key term; This draws attention to ownership, chain dependencies and public control.

The role of NLdigital and DDA: advocacy or brake on transparency?

Trade associations play a dual role: they must both protect the sector from disproportionate rules and organise public legitimacy. That has become more difficult now that data centers are under a magnifying glass.

NLdigital publishes about data center power consumption "in perspective" and links the discussion to legal thresholds and policy frameworks. (NLdigital) This is defensible, but it also reinforces the impression that the sector likes to communicate at aggregate level and via thresholds (e.g. >10 GWh), while the social discussion is about individual footprints, local grid pressure and water stress.

DDA is even more directly on the data center operator interests and has also delivered substantive work in recent years, such as a white paper on water use (with explanations, facts, and solutions). (Dutch Data Center Association) That is positive: it professionalizes the debate. At the same time, criticism remains that the sector too often "pushes the boundaries" in concrete reporting and publication (per location).

Do (American) major players have a lot of influence on strategy and lobbying?

Influence rarely works as an explicit dictate; It works through governance, calendar setting, and resource asymmetry.

- At DDA, governance is visibly closely intertwined with large operators (with an international signature). The chairmanship role and board seats lie with parties that represent a large part of the market footprint. This makes it logical that DDA is strongly committed to "license to operate": economic value, mainport arguments, and tempering restrictive policies.
- At NLdigital, the base is much broader (600+ members), but large tech and service parties have a relatively large capacity to feed working groups and influence consultation responses. (h2owaternetwerk.nl)

The effect of this is reflected in the tone of lobbying: "risk-based approach", "interoperability", "EU frameworks" and "strategic autonomy" rather than hard national exclusions or location-specific disclosure that can become political weapons.
That does not mean that the industry associations follow the line of hyperscalers one-on-one. But it does mean that their "bandwidth" often coincides with what is acceptable to the largest members — and that transparency therefore often accelerates only when regulations enforce it.

Why this is now overturning: transparency is becoming a precondition for growth

The sector can no longer afford long-term semi-transparency. Not for moral reasons, but because licensing, grid prioritization and public support are becoming dependent on it.
The public discussion is now hard: media explicitly point out that data is lacking and that governments are struggling to get complete images. (NU.nl) In a time of grid congestion and local water stress, "trust me" is not a policy tool.

What is an adult way out?

If the trade associations want to maintain their legitimacy, three steps make sense:

1. **From macro to controlled micro-transparency** – Publish at least at the location level: annual power consumption, peak power, cooling method, water source (pipe/ground/surface), WUE methodology and residual heat status. Not to shame, but to make planning possible.
2. **Make definitions auditable and uniform** – If PUE/WUE reporting leads to endless discussions, it loses support. Industry associations should enforce standardization among members, not just "explain why it is difficult".
3. **Link transparency to reciprocity** -Transparency is not a one-way street. As a sector, you can demand that policymakers are transparent about assessment frameworks: which value (jobs, innovation, digital sovereignty, heat networks) weighs against which local pressure (network, water, space)?

Over the past ten years, the data center sector in the Netherlands has often tried to buy time: by putting things into perspective, negotiating definitions and dosing transparency. This strategy was understandable at a time when data centers were still seen as a "commercial real estate asset". But that era is over. Data centers are critical infrastructure — and if you want to expand critical infrastructure in a scarcity landscape, you need to be measurable, comparable and verifiable. Transparency is no longer a burden; It is the entrance pass to the next phase of growth.
DDA and NLdigital can "reset" their lobby by no longer treating transparency as a defensive compliance file, but as a proactive sector covenant that facilitates licensing and grid planning. In concrete terms: as associations, agree on one joint Transparency and

Accountability Code in which members commit to annual publication (at location level) of at least: total electricity consumption, contracted and measured peak power, PUE (with measurement limits), WUE (with water source and measurement methodology), residual heat status and a brief explanation of energy flexibility (e.g. batteries/curtailment/demand response). Safeguard this with a light audit (third party, random) and a uniform data template that connects to EED reporting, so that "measure once, use multiple times" is created. Link this to a lobby deal: in exchange for this predictable, verifiable transparency, DDA and NLdigital are asking the central government and local authorities for an explicit, public assessment framework for new connections and permits (including lead times and criteria), so that the debate shifts from incident-driven indignation to manageable, verifiable decision-making.