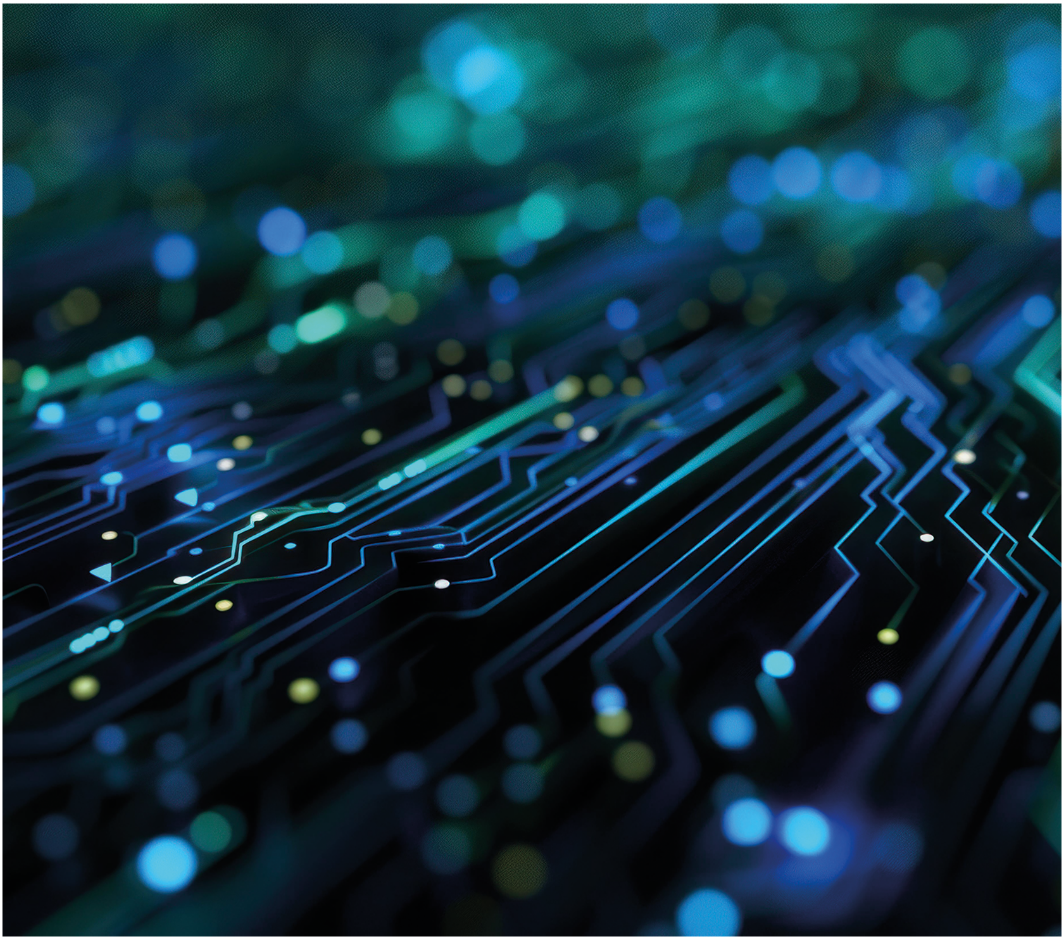


Environmental management of IT projects in the age of AI

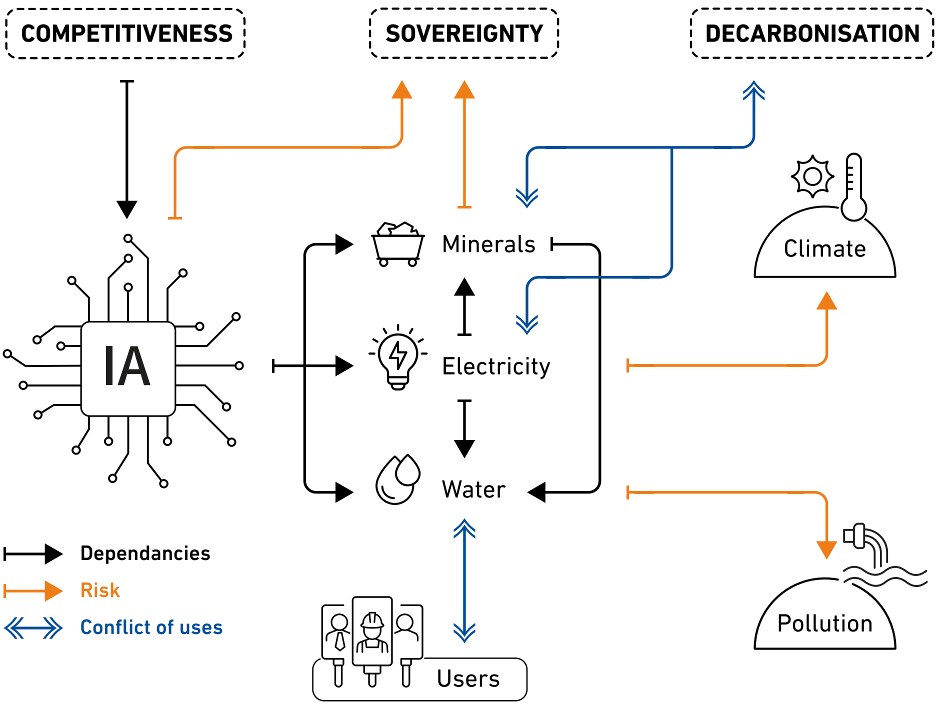
Business practices and feedback

March 2026

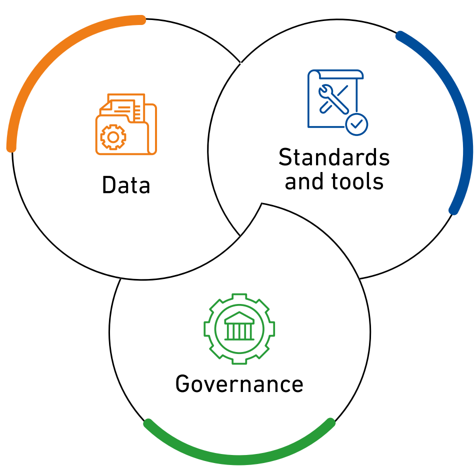
EPE
Entreprises pour l'Environnement

With the collaboration of
INR Institut du Numérique Responsable

AI AND DIGITAL TECHNOLOGY - COMPETITIVENESS AND RISK FACTORS



DRIVERS AVAILABLE TO BUSINESSES FOR MANAGING AI AND STEERING IT TOWARDS POSITIVE OUTCOMES



CHAIRWOMAN'S MESSAGE

Artificial intelligence is transforming everything. In just a few years, it has progressed from an emerging technology to a key driver of the industrial revolution, altering our production methods, our view of work, and our economic models. This technological wave promises substantial productivity gains and offers exciting opportunities for innovation. For decades, industry has invested in AI to optimise processes and reduce energy and material consumption. The recent rise of generative AI amplifies these challenges tenfold..

The benefits envisioned in areas such as work, democracy, sovereignty, and industrial renewal are significant. However, the risks are equally substantial. Given the crucial importance of both short- and long-term competitiveness for economic stakeholders, it is critical to understand these issues. This means recognising opportunities without naivety or merely following trends, and acting in accordance with our values, sustainably and fairly.

History demonstrates that during periods of rapid technological advancement, environmental risks and impacts can be underestimated. The only priority, therefore, is to avoid falling behind in the innovation race. Still, in a context where ecological transformation is inevitable, we must not lose sight of the fundamentals. We should also keep in mind that digital services offer an excellent opportunity to build a more resilient and sustainable future, enabling us to go beyond traditional models by means of the innovative solutions we develop.

Whether through its energy consumption or the uses it encourages, AI's impacts on water, climate, and natural resources are increasing, both directly and indirectly. This study by EPE, which focuses on environmental issues and is supported by concrete corporate practices, makes a distinctive contribution to the ongoing discussion. The examples illustrate professionals operating amidst rapid transformations, in which supply sometimes precedes use. Measuring and managing environmental impacts, designing more efficient and cost-effective AI systems, and seeking favourable outcomes are all emerging practices that EPE member companies wish to share here.

We hope this report will be valuable to all those working to ensure digitalisation becomes an ally of ecological transformation, propelling France to a leadership position in this field.

Estelle Brachlianoff
Executive Director, Veolia
Chairwoman, Entreprises pour l'Environnement (EPE)

CONTENTS

GOALS AND METHODS

Against a backdrop of rapidly increasing digital usage, particularly AI, this document presents the results of **a collective study on managing the environmental impact of IT projects**. It is based on the experiences of companies participating in EPE's Digital Committee, the conclusions of an initial work cycle(1), and about fifteen responses to the survey conducted among EPE and *Institut du Numérique Responsable* (INR) member companies during the summer of 2025. These include EDF, Engie, Groupe ADP, InVivo, Michelin, OCTO, Renault Group, Saint-Gobain, Schneider Electric, Société Générale, Sopra Steria, TotalEnergies, and Vinci.

This study was carried out in a rapidly evolving context marked by technological, market, and geopolitical uncertainties. Similarly, our understanding of the impacts and potential rebound effects of digital technology is still patchy. Nonetheless, it seemed useful to share the conclusions of numerous discussions, present some of the best practices identified, and draw lessons, even if partial, **to foster discussion among stakeholders involved in this issue**.

The scope of the study is limited to the green transition but forms part of a broader debate on competitiveness, sovereignty, and prosperity. It highlights environmental issues within a vast and complex field, where identifying opportunities and risks in areas such as education, work, information, and health - currently outside the scope - is also essential.

This presentation aims to highlight some of the observed trends:

- **The emerging maturity of management and assessment** practices is hindered by limited reliable and accessible data and methods, as well as by still-developing internal processes and governance.

- **Ongoing work and considerations are dynamic**, especially regarding tools, data, and their interdependencies with sponsorship and proactive governance issues.

- **There is already a variety of existing best practices**. Regarding AI, it is notable that professionals emphasise the importance of developing approaches focused on sufficiency, where questioning needs and uses is connected to finding relevant answers and allocating resources appropriately.

(1) www.epe-asso.org/en/the-digital-ally-or-enemy-of-the-ecological-transition

PART 1

RE-ENGINEERING ENVIRONMENTAL IMPACT MANAGEMENT

The digitalisation of lifestyles and production has been accompanied by increased usage, greater computing capacity, and more equipment production, making the digital sector one of the few areas of the economy with rising greenhouse gas (GHG) emissions.

Despite considerable uncertainties, its emissions still account for only 2-4% of global emissions[2]. However, the current trend could lead to a 45% increase in its carbon footprint in France from 2020 to 2030[3], despite the use of very low-carbon electricity, resulting in additional conflict-over-usage and adverse network impact risks. An increasing number of businesses are calculating the overall carbon footprint of their IT systems to understand the mechanisms involved, inform action plans, and track progress. Physical equipment (terminals, servers, buildings, etc.) generally accounts for over 80% of impacts, driven by usage and software requirements. However, AI's rapid deployment might shift impacts from manufacturing to use, with consumption becoming dominant after a few weeks due to the highly energy-intensive nature of inferences.

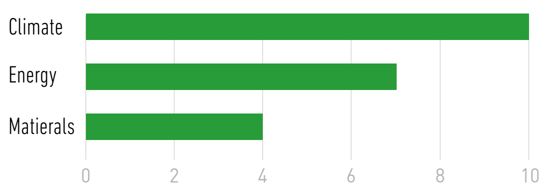
The difficulty in anticipating impacts

The originality of this approach lies in focusing on the project's perspective, especially during the design stages when flexibility is highest. As a result, half of the companies have reported that for some IT projects, they carry out formal environmental impact assessments before making investments; one even performed qualitative and systematic evaluations.

In practice, two-thirds of the participating companies factor in GHG emissions (TCO_2eq), half of them energy consumption (kWh) and a third, material issues with a wide variety of indicators (waste, circularity, reparability, eco-design, etc.).

In the absence of standards and transparency from suppliers, data quality and accessibility remain major problems.

Environmental indicators used in IT project approval processes



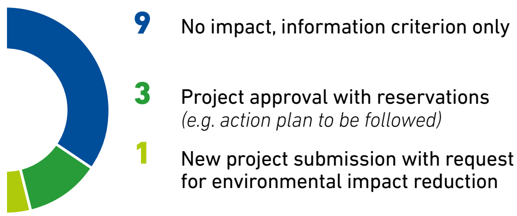
(2) Charlotte Freitag et al, *The real climate and transformative impact of ICT: A critique of estimates, trends, and regulations*, 2021
(3) ARCEP-ADEME, Evaluation environnementale des équipements et infrastructures numériques en France, 2022

The governance challenge: assessment and management

For most respondents, the results of environmental assessments are mainly for informational purposes. Some go further by systematising the eco-design process for each project or conducting an environmental impact assessment when certain thresholds are reached, such as reporting to the executive committee or presenting a budget of over €1M (ADP). Many companies are exploring ways to monetise these impacts but have not yet formalised their approach.

Monitoring the impacts of IT projects is a rapidly evolving issue. While monitoring during the development phase, particularly of eco-design practices, is becoming common, individual project monitoring in the post-deployment use phase remains rare. Impact assessment at the project stage is challenging, especially when the project depends on third-party infrastructure or software solutions.

Impact of environmental criteria on investment decisions



Are the environmental impacts of IT projects monitored?

BEST PRACTICE
For projects with a strong environmental focus (decarbonisation, sustainable materials, etc.), Michelin employs a CO_2 calculator to estimate the carbon footprint of IT across three main areas (users, servers, networks), as well as project benefits using LCA (EGDC methodology).

BEST PRACTICE
VINCI S.A. : The *GreenOps* 360° solution estimates the carbon impact of all IT systems (desktop, cloud, hosted applications) in the use phase.

Three interconnected priorities for impact management

A summary of the practices implemented and the difficulties identified highlights three essential conditions for accurate assessment of the environmental impacts of IT projects. These conditions are interconnected: precise data underpins decision-making, while managerial and decision-making processes promote data generation.

1 Available and qualified data

- Accessible and reliable emission factors thanks to the transparency of suppliers, including cloud hosts and AI providers, primarily in connection with carbon but also other elements (water, raw materials...).
- Standardised and recognised methodologies for calculating an IT project's carbon footprint across its life cycle, including type of IT infrastructure.
- Tools to automate and facilitate use of this data in project contexts.

2 Integrated decision-making processes

- Integration of environmental impact into IT requirements, together with cost, availability, safety, etc., for example, by weighting or monetising environmental issues.
- Incorporation into project life cycle: design, production, deployment, use, decommissioning.

3 Supportive corporate culture

- Support from highest levels of management, as well as from users' representatives and in-house customers, for responsible digital approaches.
- Training of IT teams, including factoring of responsible IT criteria in variable remuneration.

Implemented best practices

Assessment tools

- Automatic integration of environmental footprint thinking in all projects (before or after investment decision) – **OCTO**
- IT projects' eco-design guide (General Policy Framework for Eco-design of Digital Services – RGESN)
- Tools for assessing IT impacts and strengthening related skills – **Sopra Steria**
- Project CO_2 simulator (before and after launch), based on 12 criteria (purchasing, eco-design, greencoding, accessibility, data…), to evaluate Green IT maturity assessment using an eco-score – **Société Générale**
- Catalogue of standard technological solutions submitted upstream to environmental specifications – **Schneider Electric**
- Assessment tools embedded in the project industrialisation phase, supplemented periodically by responsible design reviews – **EDF**
- Modelling of digital services footprint (infrastructure + user trips + quantity of uses) when designing services to guide decisions, via e-footprint, an open-sourced tool at Boavizta – **Publicis Sapient**

Data centres and infrastructure

- Monitoring consumption and location of cloud resources – **OCTO**
- Renewable electricity supply
- Locating in France to benefit from low-carbon electricity
- Tool for monitoring Cloud projects' (Google Cloud Platform) carbon footprint, with multi-dimensional consolidation levels (project, field, management) to facilitate FinOps / GreenOps management – **Renault Group**

Processes and link with business lines

- Informed IT upgrade policy (laptop lifespan: six years / smartphone seven years) – **OCTO**
- Introduction of structured programme and network of ambassadors / digital responsibility advisers to support IT departments in integrating digitalisation-related environmental issues – **Renault Group**
- Integration of digital eco-design criteria into all IT group invitations to tender, in compliance with RGESN criteria, especially server environmental performance requirements (PUE, WUE) and decommissioning strategies – **VINCI**
- Project ESG Data to help business lines better measure their environmental impacts (e.g. carbon footprint calculator for CSRD reporting)

PART 2

AI - REAL IMPACTS, UNCERTAIN BENEFITS

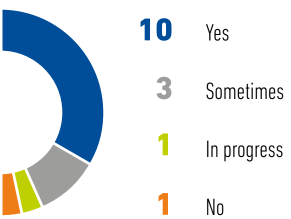
Some AI technologies, such as Machine Learning, have long been used in industry for operational or maintenance purposes. The recent surge in generative AI, highlighted by the release of ChatGPT to the public in November 2022, has led to a significant rise in usage, prompting reflection over its implications.

Although the survey shows varying responses from companies on the pace of investment in generative AI, there is strong competitive pressure to identify profitable uses. Concerns also remain about the potential rise in water, energy, and raw material consumption in data centres.

Is AI challenged or assessed?

The pursuit of AI-related opportunities and the widespread adoption of generative AI in digital services have led most businesses to question the use of AI during project evaluation. The reasons cited in the survey primarily relate to risk assessment, business opportunity identification, and budgetary concerns, rather than to environmental risks.

Is the need for AI challenged or evaluated?

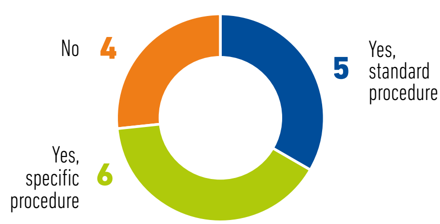


AI's deployment can also cause side effects within the company or for its stakeholders, such as system obsolescence, rebound effects on services, societal transformations, and emergence of specific processes. More than one-third of the impact involves effects on services and societal changes.

Respondents indicate that they have implemented a specific process focused on AI risks, including reputational, environmental, socio-ethical, legal, and financial risks.

The measures introduced include AI-dedicated risk assessments (Schneider Electric), ethical AI charters, governance to verify reputational, legal and financial risks associated with AI use in the company (Renault Group), internal guidelines on embedding environmental issues in AI systems deployment from the ideation phase, compliance and data protection from the solutions design phase, measurement of value delivered by each project, and an AI Gate to validate the technical solution and its utility.

Is there a process to identify the potential effects of AI?



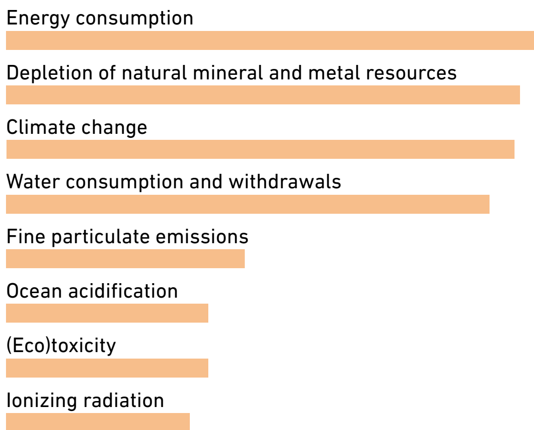
Real, identified impacts are still difficult to integrate into management

The increase in electricity consumption is currently the most clearly identified source of environmental impacts. Depending on actual and still highly uncertain future volumes (IEA, 2025), polluting energy sources could increase (coal-fired power plants in the USA), along with grid stress and competition between uses for electricity needed to decarbonise some sectors (buildings, mobility...).

The high geographic concentration of data centres (45% in the USA across 5 clusters) can also impact water availability. Water is vital for their cooling, energy production, and component manufacturing (80% of consumption)(4). Metal consumption by the digital sector remains low, apart from a few elements, including gallium, which could account for 10% of global consumption by 2030 (IEA, 2025). However, the extremely high level of purity required increases the impact of refining and worsens supply vulnerabilities (Chinese quasi-monopoly on seven metals)(5).

Of the eight potential environmental impacts of AI outlined in the AFNOR SPEC 2314 benchmark, four are considered most significant by companies. However, it is hard to rank them definitively because of the absence of detailed, multi-criteria analysis applicable to all AI and the difficulty in ensuring complete traceability of AI systems, especially for data centre operations, which remain real "black boxes" today.

Perception of AI's key impacts



To gauge the impact of AI, half the respondents now use indicators almost exclusively related to GHG emissions or energy. In practice, performance is estimated by comparing the carbon footprint or energy consumption to the inference, token, or even model training.

Are the environmental impacts of AI assessed?

(4) "Empreinte environnementale du numérique mondial", Green IT, 2019
(5) Avis numérique et environnement, ADEME, 2025

AI in tender: the significance of supplier engagement

While some companies have their own servers or even develop their own algorithms, the vast majority of AI services are provided by external suppliers (AI developers, system integrators, data hosts, etc.).

With the growing integration of AI-powered functions into software packages and digital services, and the increasing dependence on pooled and outsourced data centres, businesses only have a limited ability to directly influence the environmental performance of the digital services they utilise.

The integration of environmental criteria into AI-related invitations to tender is therefore a crucial and essential driver for engaging with suppliers. With half of the respondents stating that they have already implemented the first criterion, or planning to do so, this practice seems to be undergoing a significant transformation.

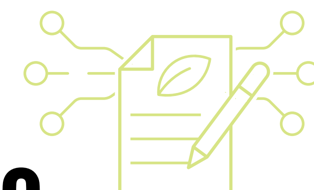
BEST PRACTICE
Implementation of an energy score to rank language models (LLM) by performance.

An analysis of the criteria used highlights two key requirements:

1. Integration of eco-design principles (INR's RIA31 responsible AI benchmark, general frugal AI benchmark – AFNOR SPEC 2314, RGESN's AI questions...);

2. Server environmental performance (PUE / WUE / CUE – Power / Water / Carbon Usage Effectiveness indicators, carbon footprint...).

Do invitations to tender contain AI-related environmental criteria?



50%
of AI-related invitations to tender are in the process of integrating environmental criteria

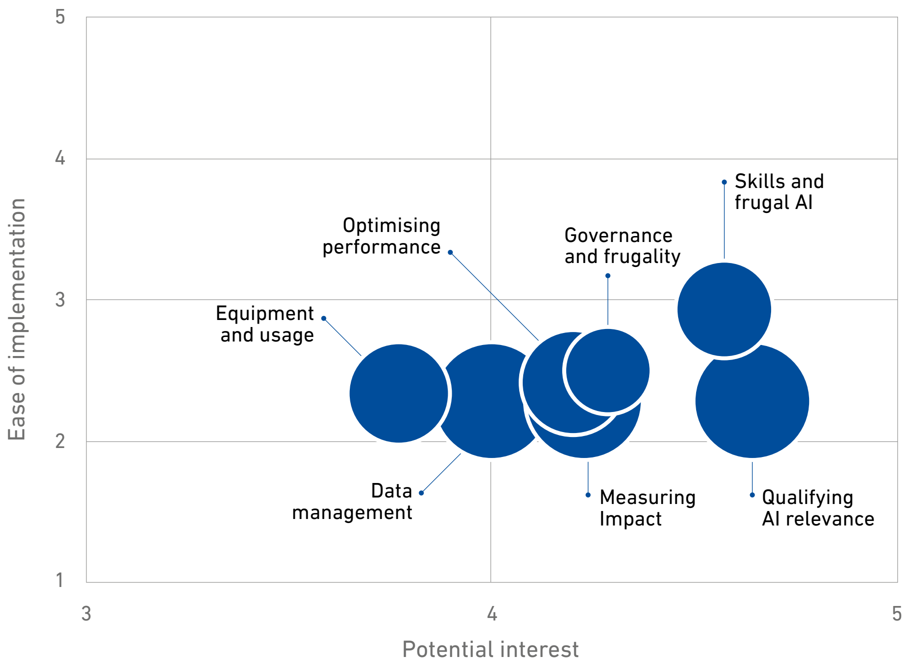
Strong interest in frugal AI

The goal of "inherently eco-friendly AI", one of the pillars of Cédric Villani's report "Giving Meaning to AI"[(6)], was adopted in 2018 as part of France's national AI strategy, which formalised ambitions concerning frugal AI. Several initiatives today promote this concept. SPEC AFNOR 2314 "General policy framework for frugal AI – measuring and reducing the environmental impact of AI" identifies seven key themes.

Respondents felt that there is indeed strong potential interest across all seven proposed themes (average score of 4.2/5). However, corporate maturity remains relatively low for all these drivers (1.8 to 2.4/5).

It should be noted that the two themes related to managerial aspects (governance and competencies) differ: one is perceived as slightly less mature, and the other is marginally easier to implement.

"Giving meaning to artificial intelligence also entails thinking about its sustainability, especially ecological."
Rapport Villani, 2018



Perception on a scale of 1 to 5 of 7 themes for implementing frugal AI (size is proportional to perceived corporate maturity).

(6) www.vie-publique.fr/rapport/37225-donner-un-sens-lintelligence-artificielle-pour-une-strategie-nation

Three challenges of AI environmental impact management

Consistent with the challenges of managing the environmental impacts of IT projects, the companies surveyed provided feedback on three interconnected dimensions.

1

Transparency and access to reliable data

The lack of accurate data on the environmental impact of AI solutions makes it impossible to perform an objective assessment of the carbon footprint of AI projects or comparisons between solutions. Model providers (such as LLM publishers) and cloud hosting providers do not publish enough information on energy consumption, the emissions from infrastructure development (including GPU chips used by AI data centres), or the calculation methodologies used.

2

Standardised methodologies and measurement tools

There is no universal methodological framework today for calculating the environmental impact of AI, no integrated tools enabling these impacts to be measured easily (for example, native dashboards), no allocation rules applicable to the different steps (e.g. GPU manufacturing, pooled project and application storage, data centre location, inferences...). The extremely rapid pace of innovation in digital technologies, particularly AI, poses a major risk because it creates significant discrepancies between computational assumptions and real-world conditions, leading to considerable outcome uncertainty. According to the IEA, the adoption rate of accelerated servers (with GPU) will undoubtedly be a key criterion of future performance.

3

Governance and organisational maturity

Many organisations find it challenging to balance the productivity benefits promised by AI with its environmental impact. The widespread deployment of AI is often perceived as a key driver in the innovation race. The lack of stakeholder training (managers, IT teams, users, customers, and principals) and the absence of clear targets (individual or collective) hamper the adoption of measurement tools and trade-off processes.

Best practices for managing AI's environmental impacts

To supplement existing good practices for managing the environmental impacts of IT projects, some companies are rolling out AI-specific initiatives.

Data

- Minimising model size by removing redundant or outdated data

Governance

- Carbon impact projections relating to the addition of an AI functionality prior to decision making, with "e-footprint" and Ecologits, Boavizta open source tools and GenAI impact – **Publicis Sapient**
- Life cycle assessment of "AI for Sustainability" use cases – **Schneider Electric**
- Analysis of project risks, and AI-related environmental issues – **EDF**
- Skills development in alignment with the AI Act and setting up of a multidisciplinary working group in collaboration with HR, IT, Ethics, Innovation and Communication, as well as a network of ambassadors in all departments – **Groupe ADP**
- Collection and sharing of feedback on the real usefulness of solutions deployed to decide whether to maintain or decommission them – **OCTO**
- Global governance of AI, including selection of uses and partners, tool optimisation and employee training – **Veolia**

Model

- Veolia Secure GPT: a personal assistant optimised via enhanced prompts, smart routing and SLM, targeted feature limitations and user information on energy and carbon impacts – **Veolia**
- "Smart" models that activate only specific - not all - parameters for inference, or adapt inference to energy demand
- EcoMind AI: an AI algorithm environmental impact simulator for use by service designers before the launch of a project – **Sopra Steria**
- Small-scale models tailored to specified tasks – **Schneider Electric**
- Non-systematic activation of AI features offered by SaaS publishers – **OCTO**

Use

- In-house best practices guide on responsible AI – **EDF**
- Raising awareness among all users about clear prompting and the use of "traditional search engine versus generative AI" – **EDF**
- Development of an impact calculator for CoPilot usage among employees – **Engie**
- Macro-simulation of CO_2 emission pathways related to generative AI in 2030 – **Société Générale**

SPEC AFNOR 2314 also offers a list of qualified best practices.

Environment-friendly uses still associated with predictive rather than generative AI

Two-thirds of respondents reported having already adopted environment-friendly practices, mainly in predictive AI, enabling optimisation of energy consumption in industrial systems as well as raw material use. The industrial, transport, and building sectors together make up about 95% of global final energy demand and are increasingly digitised and connected, opening up opportunities for their optimisation through artificial intelligence.

In practice, the first large-scale deployments of generative AI across businesses mainly involve personal assistants. Beyond that, uses vary widely between one business and another, with some exploring solutions based on viable applications and economic models. Autonomous vehicles could thus generate energy savings of 10-20%, but also trigger a rebound effect of undermining public transport use (IEA, 2025).

Generative AI applications could be utilised in ecology. For instance, conversational agents – chatbots – might be used to explain corporate CSR strategies, examine and analyse non-financial reporting, and evaluate and improve the carbon footprint, life cycle assessment, traceability, or risk mapping.

Anticipation

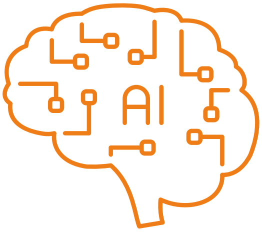
Water *Consumption*

Data *Prediction*

Industry *Energy*

Optimisation *Transport*

Buildings



Renault

- **Optimisation of** spare parts **collection and delivery routes** to limit mileage and speed up deliveries. AI has avoided the circulation of 8,000 trucks a year, equivalent to 21,000 tonnes of CO_2.
- Maximising truck fill rates.
- Operational predictive early warning system to identify risks (natural disasters, etc.) for our 5,000 suppliers, ensuring continuity of production.

Schneider Electric

- **Energy optimisation** in microgrids, HVAC systems in buildings, and community energy networks.

VINCI

- CaledonIA : **a calculation software that simulates floods in real time** by coupling physical and AI models. It aids local authorities in identifying risks and forecasting impacts to ensure proper crisis management and well-informed investment decisions.
- VINCI Energies - Smart Tunnel Lighting with AI: **optimising lighting usage in underground infrastructures** by adjusting the level of lighting in real time based on traffic, weather conditions, and the presence of vehicles or pedestrians, while ensuring safety.

InVivo

- **Consumption optimisation and reduction** from 5% to 25% (water / electricity / gas) thanks to an AI engine combined with a digital twin, developed in-house and rolled out at malt manufacturing plants.

EDF

- **Predictive maintenance** of specific industrial components to improve operational monitoring.
- **Simulation of inhabitants' behaviour in their dwellings** to predict their power consumption.

Engie

- Deep learning for optimising consumption forecasts.

Michelin

- **Optimisation of rubber mixing times**: by combining digital simulation and machine learning techniques, industrial teams reduce rubber mixing times in tanks to stop the process at the right time. The energy savings generated in plants are significant.

CONCLUSION

Which AI pathway benefits the green transition?

All AI technologies have recently been affected by the hype surrounding generative AI. However, the extremely rapid pace of innovation, limited data access, significant uncertainties over deployment and their impacts conflict with measurement methodologies. This, in particular, leads to a high degree of uncertainty about management practices, which limits the quantitative information available to compare environmental impacts with AI inputs.

This measurement difficulty, however, does not prevent businesses from acting immediately, despite the complexity of managing AI's impacts, especially as suppliers or even end customers account for a significant proportion of those impacts. The results of the studies summarised above highlight the specific measures each business can implement directly:

- engage with suppliers by incorporating ambitious environmental requirements into invitations to tender;
- engage with customers by questioning their needs and resisting over-enthusiasm through careful judgement;
- promote in-house involvement through governance processes for AI development and use.

In addition to company-wide actions, and given the current momentum magnitude, acting collectively is essential for economic stakeholders, particularly with a view to:

- establishing environmental standards and regulations for AI developers and infrastructure providers on which AI depends;
- optimising the performance of data centres and their integration with the electricity grid, as well as with planning and decarbonisation policies;
- eco-designing models and developing a frugal AI ecosystem;
- directing research and investment towards positive uses of AI.

In France 2030, France has chosen to prioritise AI as a strategic sector. Its goal is to become a leader in this field and ensure that AI plays a key role in the green transition. An ecosystem of stakeholders is also active internationally through the Coalition for Sustainable AI. Joining, supporting, and strengthening such collective initiatives will be essential for developing frugal, sovereign, and competitive AI that aligns with the values and interests of French economic stakeholders.

Acknowledgements

This brochure results from the work of EPE's Digital Committee, which met between 2022 and 2025 under the chairmanship of Richard Bury, Director of the Digital Responsibility Programme, and Carine de Boissezon, Director of EDF Group's Impact Department. Drafted by the EPE team, it reflects the experience and best practices of the association's members in measuring and sustainably managing innovation. EPE thanks the representatives of member companies who shared their experiences and participated in meetings. EPE also appreciates the contributions of experts and representatives from public authorities or associations, some of which are included in this publication, and acknowledges their role in stimulating thinking and actions within the Committee. Nathalie de La Falaise and Jean-François Mathieu are thanked for their respective contributions, as is Govind Bhinder of FEAT for the English translation. Special thanks are due to Benoit Galaup and Emmanuelle Bluon, successive heads of the Digital Committee, and David Laurent, who coordinated this study and authored this summary report.

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Drafting and coordination: David Laurent, Entreprises pour l'Environnement
Graphics: Sophie Chatenay
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Entreprises pour l'Environnement (EPE)

The French association Entreprises pour l'Environnement (EPE), founded in 1992, brings together 60 major French and international companies to share their best practices and work together to better incorporate environmental considerations into their strategies and operations. Its raison d'être – 'one planet and a prosperous world' -sums up the resolve of its members to lead their own green transition as well as that of society, and to ensure that economic development compatible with planetary boundaries is socially accepted, indeed desired. EPE is the French partner of the World Business Council for Sustainable Development (WBCSD).

EPE publications and works are available on: www.epe-asso.org/en/documents-reports/

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AIRFRANCE
Air Liquide
AlixPartners

Amundi Investment Solutions
apave
ARKEMA
AXA
BCG BOSTON CONSULTING GROUP
BIC

BNP PARIBAS
GROUPE BPCE
Caisse des Dépôts GROUPE
Capgemini
GROUPE CARSO

CMA CGM
CRÉDIT AGRICOLE
Crédit Mutuel Alliance Fédérale
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