

techUK data centre programme

COVID-19: Data centres as CNI

International comparisons





















As of 10 April 2020

We have been working with data centre trade associations across Europe and beyond to compare notes on the relative status of data centres. We asked whether data centres were designated as Critical National Infrastructure by default and if not, whether individual data centres were singled out for CNI status on the basis of their function. We also asked whether data centre staff were given key worker status, either formally or informally. We also noted whether or not countries had been under some form of lockdown or restriction on movement. In some cases this varied by region or was non obligatory. In some cases operators weren't sure whether they were CNI or not. Anecdotal comments were also summarised. Thanks to the Dutch Data Center Association for coordinating responses.

Column keys as follows:

- DC market size grouped in to Small, Medium, Large – S, M, L
- CNI by default – whether data centres are designated CNI by default
- Some are CNI: individual DCs are designated CNI depending on function
- Key worker status? Do data centre staff, contractors and suppliers qualify for key worker status?
- Lock down: has there been some kind of lockdown – Yes, No, or Partial - Y, N, P?

Location	DC mkt size	CNI by default ?	Some are CNI	Key worker status?	Comments	Lock down
AT 	S	N	N	N	Anecdotal issues reported of DC outages and impact on service provision due to lack of access.	Y
BE 	S	N	N	N	DCs not CNI but digital infrastructure is on key workers list.	Y
DK 	S	N	Y	Y	Some data centres listed as CNI depending on function. No issues reported regarding access.	N
FI 	S	Y	N/A	Y	Data centres have been CNI since cold war. No changes needed to status	Y
FR 	L	N	Y	N	Some data centres designated CNI based on function. Staff not yet classed as key workers.	Y
DE 	L	Y	Y	Y	Data centres over 5MW designated CNI relatively recently.	P
GR 	S	N	N	N	DCs not classed as CNI and not on key workers list. Negotiations ongoing with government	Y
IE 	L	N	N	Y	DCs are considered infrastructure but not formally classed CNI. Construction projects stopped.	Y
IT 	M	N	N	N	DCs not classed as CNI but staff able to access sites provided they have letter of authority.	Y
NL 	L	N	Y	Y	Some DCs designated CNI depending on function. Staff informally recognised as key workers.	P
NO 	M	N	Y	Y	Some data centres designated CNI depending on function. Dialogue ongoing	P
PL 	S	N	N	?	Data centres not CNI unless they include telecoms exchange.	Y

PT		S	N	Y	Y	Situation fluid – CNI currently only extends to telecoms but scope being expanded.	?
ES		M	N	N	?	Activities related to telecoms allowed to continue operating. CNI status unclear.	Y
SE		M	N	Y	Y	Data centres not CNI by default but digital infrastructure included in key worker list	N
CH		M	N	?	?	Data centres can request CNI status from government. Unclear how many have CNI status	Y
UK		L	N	Y	Y	Some data centres designated CNI depending on function. On key workers list. Dialogue ongoing.	Y
US		L	Y	N/A	Y	Federal declaration that ICT is critical, but significant variation in approach by state. Largest cluster in N Virginia: see Loudoun page . In dialogue.	Y
Location		DC mkt size	CNI by default ?	Some are CNI	Key worker status?	Comments	Lock down

Observations

Although the situation is fluid in many countries because the sector's status is now under a new level of scrutiny, there are broad similarities across Europe. In most cases communications infrastructure is designated critical and data centres therefore sit in a grey area depending on whether they are seen to underpin comms. Awareness of data centre function within policy makers varies significantly by nation state. In the Netherlands and Scandinavia awareness is good, elsewhere less so.

Most European countries designate some data centres as critical national infrastructure depending on their individual function. In some cases the operator must request CNI status, in others such as the UK, CNI status is decided by Cabinet Office, and those few data centres so designated will be well aware.

In Scandinavia there are exceptions, with data centres designated CNI by default in several states, generally related to historical factors relating back to WWII and/or the Cold War.

In Germany all data centres over 5MW are designated CNI by default. This measure was introduced within the last five years and was unpopular at the time. However, operators with German facilities say that this designation has dramatically smoothed their response to COVID-19.

For comparison of lockdown arrangements across Europe, see also:

<https://www.politico.eu/article/europes-coronavirus-lockdown-measures-compared/>

For the US see: <https://www.cisa.gov/critical-infrastructure-sectors>

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