Submission to the Special Rapporteur on Climate Change:

Technologies related to climate change and their impacts on human rights

September 2026[1]

I. Introduction

The importance of a human rights and just transition framework to mitigate the adverse impact of climate change, particularly for historically disadvantaged groups, has been affirmed by the UN Human Rights Council in a series of resolutions.[2] In this context, we welcome the call for inputs by the Special Rapporteur on climate change examining how climate mitigation technologies implicate human rights across their lifecycle. Our submission focuses on Artificial Intelligence (AI), specifically its claimed use as a climate mitigation technology.

AI is increasingly presented as a technology that can accelerate progress towards climate justice goals through data-driven intelligence. The examples that are put forward of AI's use cases in climate mitigation are numerous – energy use optimization through smart grids, efficiency in carbon markets, urban planning for climate resilience, disaster forecasting, waste management, and more. This narrative is gaining rapid momentum in international policy and governance discussions on climate change. Multilateral institutions who hold responsibility for stewarding an equitable, democratic, and human-rights-centric climate transition are rushing to secure partnerships with transnational technology companies (Big Tech).[3]

This framing of AI as a neutral technological tool with vast climate mitigation potential obscures two interconnected realities: First, AI is itself a rapidly expanding material industry with significant environmental and social impact. Second, its development and deployment are controlled by a highly concentrated corporate ecosystem whose business interests increasingly shape how climate action is defined, implemented, and measured. States have an obligation to ensure that climate technologies are governed and deployed through a human rights-based approach. The headlong rush to embrace AI in this regard stands in contradiction to the objective of human rights-based climate action – to ensure that people and the planet's rights and interests are centerd, and not corporate profits.

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[2] https://docs.un.org/en/A/HRC/RES/32/33; https://docs.un.org/en/A/HRC/RES/56/8; https://docs.un.org/en/A/HRC/RES/59/25

[3] https://unfccc.int/sites/default/files/resource/UNFCCC_Microsoft_Partnership_2023.pdf

II. The False Promise of AI as a "Climate Technology"

In our submission, we contend that the framing of AI as a "climate technology" is a false promise, for three reasons. First, AI itself is an industrial and infrastructural behemoth with an ever-growing environmental footprint and significant risks to human rights. Second, the political and economic structures within which AI innovation is carried out are characterized by extreme concentration of power, capital and control over decision-making. Third, the climate mitigation claims of AI are systemically unverifiable, leading to a narrative of technosolutionism that obscures the material reality of how AI's infrastructural assemblages are developed and deployed.

1. The ecological and social costs of AI infrastructures are in and of themselves a pressing climate and human rights issue

Evidence on the global scale of environmental and allied social harms in the AI revolution is now irrefutable.[4] The AI models and tools that are being promoted as climate technologies today are extractive at every level.

The cutting-edge semiconductors and Graphics Processing Units (GPUs) that are the cornerstone of the AI revolution are dependent on rare earth minerals, such as cobalt, lithium, and nickel.[5] Mining just one tonne of rare earth minerals can generate up to 2,000 tonnes of toxic waste,[6] and many of these deposits are located in ecologically sensitive zones.[7] The global supply chain for rare earth minerals is also notoriously violent, linked to child labour,[8] the fuelling of illicit financial flows,[9] and the forcible displacement of Indigenous Peoples.[10] The physical facilities that house computing infrastructure for AI have high energy demands, generate high rates of greenhouse gas emissions,[11] and need over 5 million gallons of water a day.[12] This makes data centers one of the very few sectors where energy demand and emissions are set to rise, exactly at the moment we need steep emission cuts.[13] Additionally, given that data centers are often built in areas already encountering water insecurity, as land in dry, arid areas is relatively cheaper, they often become a double whammy for communities already experiencing water insecurity.[14] The rate at which these infrastructures are expanding is intensifying pressures on local communities, who have little say over how their resources are used, in violation of the international principle of Permanent Sovereignty over Natural Resources.[15] It also infringes on their right to free, prior, and informed consent, as enshrined in the United Nations Declaration on the Rights of Indigenous Peoples, which

[4] www.unep.org/news-and-stories/story/ai-has-environmental-problem-heres-what-world-can-do-about
[5] www.etcgroup.org/sites/www.etcgroup.org/files/files/sugar_spice-web_1.pdf
[6] www.bbc.co.uk/news/resources/idt-66cdf862-5e96-4e6e-90b8-a407b597c8d9
[7] www.chathamhouse.org/2026/03/rare-earths-race-risks-environmental-disaster
[8] www.npr.org/sections/goatsandsoda/2023/02/01/1152893248/red-cobalt-congo-drc-mining-siddharth-k
[9] https://www.theguardian.com/global-development/2025/nov/07/drug-trafficking-extortion-kidnapping-the-law
[10] www.sirgecoalition.org/news-and-articles/indigenous-peoples-and-the-mineral-footprint-of-artificial-intelligenceNationsPeoplesthe
[11] www.unep.org/news-and-stories/story/ai-has-environmental-problem-heres-what-world-can-do-about
[12] https://www.eesi.org/articles/view/data-centers-and-water-consumption
[13] https://stand.earth/press-releases/160-data-center-carbon-footprint-increase-research-finds-microsoft-big-oil-forge-7b-partnership-as-several-ai-infrastructure-projects-push-hyperscaler-off-credible-path/
[14] www.theguardian.com/global-development/2026/aug/17/india-disasters-heatwaves-slum-diaries-delhi-vulnerable-temperatures
[15] https://www.ohchr.org/en/instruments-mechanisms/instruments/general-assembly-resolution-1803-xvii-14-december-1962-permanent

also guarantees their right to participation and right to a clean, safe, and healthy environment for their own use and management.[16] Moreover, the increasing complexity of AI innovation is accompanied by a rise in electronic waste burdens, a large quantity of which is exported to the Global South, where workers and communities are exposed to harmful chemicals like mercury and flame retardants released into the environment.[17] The ecological footprints of AI infrastructures are also unequally distributed, exported to the Global South, which lacks the capacity for strong enforcement of environmental regulation and human rights law.[18]

Notwithstanding the scale of the ecological devastation wrought by AI, Big Tech is pressing ahead bullishly with plans for expansion and consolidation. The capital expenditure of Google, Microsoft, Meta and Amazon on AI infrastructure is forecast to be $650 billion in 2026 alone.[19] At the same time, these corporations are scrambling to hide the true social and environmental costs of their relentless expansion – Microsoft, for instance, has lobbied strongly for the European Commission to ensure its regulations on energy efficiency do not include transparency requirements for the costs of individual data centers.[20]

It is therefore increasingly clear that the expansion of AI technologies are accompanied by mounting environmental and social costs that affect individual and collective human rights (right to health,[21] right to water,[22] right to a clean environment,[23] right to decent and dignified work,[24] and the rights of the child[25]). The fact that Big Tech remains undeterred in its pursuit of profit and control, despite the destruction and exploitation caused by their technologies, demonstrates that they cannot be seen as trusted partners in the fight against climate change.

2. The AI innovation ecosystem is characterized by extreme concentration of power, capital and decision-making capacity, leading to human rights violations

As outlined above, AI as an innovation ecosystem is built on a deeply extractive political economy. AI systems are dependent on the large-scale extraction of public, personal, environmental, territorial and behavioural data. Climate applications add new categories – satellite imagery, agricultural data, biodiversity information, land-use records, emissions data, mobility data and Indigenous/local knowledge.

Datafication is not a neutral process of consolidating fragments of information. It gives rise to new realities and truths, raising ethical and political questions. Neither is data merely individual fragments of information. Data's criticality lies precisely in its ability to cumulatively amplify "intelligence value" which far outstrips the value of singular data points.[26] The extraction of community data, especially from Indigenous Peoples, to power AI and generative technologies

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[16] www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf
[17] www.etcgroup.org/sites/www.etcgroup.org/files/files/sugar_spice-web_1.pdf
[18] www.cigionline.org/static/documents/Policy_Brief_No._225_Maheshwari.pdf
[19] https://qz.com/big-tech-ai-capex-amazon-microsoft-meta-google
[20] https://algorithmwatch.org/en/copy-paste-govern-microsoft-ghostwrote-eu-policy/
[21] https://www.ohchr.org/sites/default/files/Documents/Publications/Factsheet31.pdf
[22] https://www.ohchr.org/sites/default/files/Documents/Publications/FactSheet35en.pdf
[23] https://docs.un.org/en/a/hrc/res/48/13
[24] https://www.ohchr.org/en/right-work
[25] https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child
[26] https://longreads.tni.org/stateofpower/the-intelligent-corporation-data-and-the-digital-economy

within capitalist systems undermines the rights of Indigenous Peoples by trapping Indigenous knowledge in proprietary enclosures, commercializing traditional knowledge and erasing Indigenous notions of communal resource management.[27] This is in contravention of the rights of Indigenous Peoples under international law. Other marginalized groups such as peasants and other rural people, who also have distinct rights and knowledge systems, are also particularly at risk. Furthermore, where the non-personal data of communities is concerned – such as satellite and geospatial data, which is essential for AI's climate use – they are harvested and processed within the same extractive systems, in the absence of any meaningful governance framework to redistribute intelligence dividends back to communities. One-time individual consent, which is the common standard in most data governance frameworks, does not account for the multiple downstream uses of data, wherein it is constantly repurposed to shed its provenance and evade proper attribution.[28]

In sum, control over the data that fuels AI's climate mitigation deployment is wrested away from communities, particularly those most at risk, and vests in the hands of powerful corporate actors.

This data extractive model is further consolidated through horizontal and vertical integration in AI markets.[29] This means that decisions about the development, deployment and expansion of AI infrastructures – that have deep climate justice implications – are concentrated in the hands of Big Tech companies operating transnationally in a deeply fragmented and weak governance landscape.

The ironclad control that these corporations exert over data, platforms and digital infrastructures in totality enables their expansion into adjacent sectors, also characterized by corporatization (eg: agriculture), leading to a dangerous democratic deficit in AI use.[30] This leads to a range of human rights implications, particularly from the perspective of collective rights. For instance, AI-enabled agricultural practices – determined by the very same corporations purporting to mitigate climate change – can facilitate environmentally harmful practices, such as monoculture expansion, contamination of ecosystems through agrochemicals, and increased greenhouse gas emissions from intensive mechanization and data center operations.[31] These models are also proven to promote reliance on chemical fertilizers and pesticides, undermining water quality.[32]

As AI's integration into climate action accelerates, ancillary sectors such as ecosystem and land use management, agroecology and food sovereignty, and biodiversity will be transformed into data assets for financial markets, divorcing these lifeworlds from the communities that nurture and depend on them. This is totally opposed to the goal of climate justice.

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[27] https://itforchange.net/sites/default/files/add/Indigenous%20People's%20Right%20to%20Data%20-%20OHCHR%20Submission.pdf
[28] https://cipit.strathmore.edu/formal-recognition-of-indigenous-data-in-ai-the-role-of-the-wipo-treaty-on-ip-genetic-resources-traditional-knowledge/
[29] https://www.oecd.org/en/publications/artificial-intelligence-and-competitive-dynamics-in-downstream-markets_ccf0624a-en/full-report/component-6.html
[30] https://itforchange.net/sites/default/files/2645/Commons%20to%20Code_How%20Platforms%20Rewire%20Agriculture%20and%20Reshape%20Power_3.pdf
[31] https://ipes-food.org/wp-content/uploads/2026/02/HeadInTheCloud.pdf
[32] https://itforchange.net/sites/default/files/2645/Commons%20to%20Code_How%20Platforms%20Rewire%20Agriculture%20and%20Reshape%20Power_3.pdf

3. The climate claims of AI are unverified, unjustified and promote a technosolutionist narrative that sidelines the rights of people and the planet

As AI becomes increasingly embedded as a cornerstone for climate justice, Big Tech firms become providers of the infrastructure through which climate action is determined, measured, and deployed.

Even as the ecological and social costs of these technologies mount, and the democratic space for dialogue shrinks, the tall climate claims made by AI companies have been exposed as lacking any empirical basis. First, most of the climate benefits touted by these firms arise from traditional machine learning algorithms that have a far lower ecological footprint than the generative AI tools currently being pushed forward by the industry.[33] Second, the claims of climate mitigation impact are rarely backed by scientific, academic or peer-reviewed evidence – most of the claims cite corporate- and industry-funded research, once again exposing the bait-and-switch model that these companies use to gain infrastructural control over climate action.[34]

At the same time, there is a far more insidious narrative at play. Through monopolistic control over digital and data infrastructures, Big Tech firms shape discourse, narratives, and collective imaginaries of how climate justice is envisioned. Climate change is clearly not primarily a failure of computational optimization. It is the consequence of an economic system that has permitted enormous concentrations of wealth and productive capacity to depend upon fossil-fuel use, intensive resource extraction, and environmental degradation at the expense of the rights of the vast majority of the human population. For the corporations, ultra-rich individuals, and elites who have a great responsibility in climate breakdown and benefit from the current economic model, it is easier and more convenient to promise an AI-powered optimization platform than to question entrenched fossil-fuel interests, regulate corporate power, redistribute resources, or strengthen community control over land and natural resources. This displacement act is precisely what is engineered by promoting AI as a climate technology – which it is manifestly not. At the same time, it obscures more sustainable and people-led alternatives that can center control in the hands of communities and effect meaningful climate action.

[33] https://beyondfossilfuels.org/wp-content/uploads/2026/02/AI-for-climate-claims-Report_FEB-2026_FINAL-2-16.pdf
[34] https://beyondfossilfuels.org/wp-content/uploads/2026/02/AI-for-climate-claims-Report_FEB-2026_FINAL-2-16.pdf

III. Recommendations

As our submission has outlined, these speculative technological interventions carry serious risks for climate justice, food systems and human rights, and would concentrate enormous power over global climate action in the hands of a small number of governments, companies, and technologists, while distracting from a true fossil phase-out. Climate science and the climate justice movement have identified the measures that are needed to take urgent climate action, which include curbing emissions, reining in untrammelled growth and extraction, public financing for renewable sources of energy, and adhering to common but differentiated responsibilities. Resources should be used to implement those measures while ensuring climate and development justice go hand in hand, rather than fuelling a speculative and extractive AI industry, which has no proven benefit.

At the same time, data-driven technologies have the potential to further climate justice, provided the structural conditions of AI development and deployment are transformed for public interest and accountability, democratic decision-making, environmental sustainability and equitable benefit-sharing. This necessarily means breaking up Big Tech's cannibalization of AI innovation ecosystems and centering power in the hands of people and communities.

To that end, we make the following recommendations:

1. **Reject Big Tech's framing of AI as a climate solution**

- Denounce attempts by Big Tech corporations to position their AI models as climate solutions and reject their attempts to infiltrate multilateral institutions that hold the mandate for climate justice.

- Challenge their claims of AI's climate benefits by calling for independent, transparent and evidence-based assessment across the full life cycle of AI systems, that will expose their adverse environmental footprint.

2. **Prevent AI from furthering dependence on fossil fuels**

- Forbid the use of any existing or potential fossil fuel capacity to power AI-ready data center facilities, to ensure that the rapidly growing energy demands of data centers are not falsely justified through AI's climate benefits hoax.

- Ensure that AI infrastructure expansion does not undermine fossil fuel phase-out commitments by preventing approvals for AI infrastructure that expands demand for fossil fuel energy sources.

3. **Integrate climate justice and human rights into digital trade agreements**

- Integrate climate justice and human-rights commitments into digital trade agreements, in particular by ensuring that digital trade rules do not prioritize investors' rights to profits over the sovereign ability of countries to regulate digital technologies, data infrastructure and AI in pursuit of climate action, environmental protection and human rights.

4. **Establish independent due diligence obligations on AI and just transitions**

- Standardize policies and practices that support end-to-end measurement, disclosure, and mitigation of the climate impact of AI tools and their supply chains.
- Require climate impact assessment across the full life cycle of AI, including impacts associated with data, computing, electricity, water, hardware, semiconductor production, mineral extraction, and finally, decommissioning.
- Recognize ex ante environmental, technology and social impact assessments as a baseline norm for climate-related technologies to identify potential human-rights violations, environmental impacts, and collective harms before climate mitigation technologies are funded, deployed or scaled.

5. **Build and fund open-source, public-interest and low-compute alternatives**

- Promote the use of open-source and low-compute approaches that can enable broader public participation in technologies for climate justice, and reduce dependence on corporate-controlled digital infrastructure.
- Encourage data stewardship models that deepen and promote a collective and commons-based data governance regime that allows the benefits of data-driven intelligence to be realised for public interest rather than corporate profits.