

May 14, 2024

To: Eugene Simonov, Doctor of Conservation, Chief expert,
Rivers without Boundaries, Kazakhstan

Dear Mr. Simonov,

Thank you for your letter dated March 28th, 2024, on the proposed Rogun Hydropower Project (Rogun HPP) and request for clarifications on the World Bank response to the letter on Rogun HPP Project (January 18). As mentioned, we highly value engagements with Civil Society Organizations (CSOs) to enhance accountability and transparency.

I. Disclosure of E&S (Environmental and Social) documents

We confirm that the website managed by the Project Management Group of Rogun HPP (PMG)¹ is the primary website that should be consulted. It has a section entitled "[Update of the environmental and social instruments of the Rogun HPP Project](#)".

E&S instruments can also be found on the World Bank's external website under the Technical Assistance project ([P178819 - Technical Assistance for financing framework for Rogun Hydropower Project](#)) or the proposed financing project ([P181029 - Sustainable Financing for Rogun Hydropower Project](#)). However the PMG website should be considered as the primary website.

You have raised valid points about how the PMG website can be better used to disseminate information about the project for consultations, and we are working with PMG and other project stakeholders to improve Rogun related websites.

[The PMG website](#) contains the E&S that have been disclosed to date, including:

- **The Environmental and Social Impact Analysis / Environmental and Social Management Plan (ESIA/ESMP).** The ESIA/ESMP were disclosed on December 22, 2023 on the PMG website and on the World Bank's external website. The ESIA/ESMP posted on the PMG website, dated January 19, 2024, is the same version as December 22 version. The December 2023 ESIA/ESMP is the most recent version disclosed to date and will be updated and finalized to take into account comments and feedback received; this will be tentatively done before the end of 2024. Volume II of the ESIA contains the technical annexes for the ESIA/ESMP and is in the process of being updated. It will be disclosed as soon as the technical information is finalized.
- **The Resettlement and Livelihood Restoration Framework (RLRF).** The RLRF was disclosed on the World Bank's external website on April 1, 2024, and on PMG's website on April 11. The Directorate of the Flooding Zone (DFZ), which is responsible for resettlement at the dam site, is commencing consultations.

¹ www.energyprojects.tj

- **The Stakeholder Engagement Plan (SEP)**. The SEP was disclosed on February 28th, 2024.
- **Labor Management Procedures (LMP)**. The LMP was disclosed on February 7th, 2024.
- **Gender Action Plan (GAP)**. The GAP was disclosed on October 16th, 2023.

Additional documents under preparation and expected to be published soon include:

- **The Resettlement Action Plan and Livelihood Restoration Plan** for the second phase of resettlement (2017-2026) (RAP 2/LRP 2) is under preparation and will be consulted upon and disclosed prior to the Effective Date of the project.
- **The Environmental and Social Commitment Plan (ESCP)** is in the process of being finalized and will be disclosed prior to appraisal.
- **The Biodiversity Management Plan** is under preparation and will be consulted upon and is expected to be disclosed for public consultation mid-2024.
- **The detailed Cumulative Impact Assessment** is under preparation and expected to be disclosed for public consultation mid-2024.

Comments on the ESIA/ESMP and other E&S instruments are welcome and well-received until the documents are finalized, which is tentatively expected before the end of 2024. The E&S instruments will continue to be updated, as and when necessary, during project implementation. In addition, other E&S management plans will be prepared and disclosed prior to the commencement of relevant civil works or project activities.

With respect to the Panels of Experts, they are hired by and report to the government of Tajikistan. Therefore, the World Bank is not responsible for disclosing the panel of experts' reports. Please contact PMG to discuss the possibility of receiving a copy, depending on the Government's specific views and concerns, if relevant and applicable.

II. Stakeholder Engagement and Public Consultations.

Regarding the information-sharing and consultation meetings with riparian governments and CSOs on Rogun HPP's updated ESIA in Almaty, Kazakhstan, on November 8-9, 2023, A preliminary draft of the ESIA/ESMP was disclosed on the PMG website in October 2023 for the purposes of the consultations.

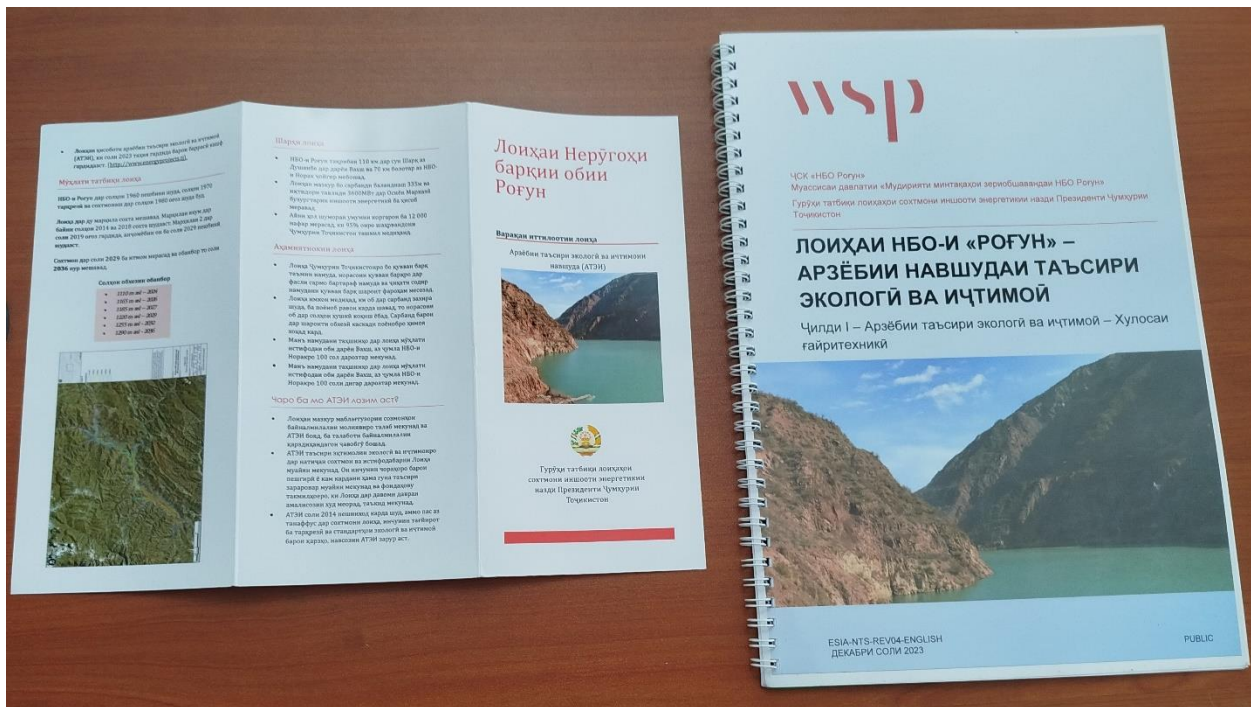
In preparation for those meetings, Rogun PMG, with support from the World Bank, prepared a list of Central Asian CSOs which could have a potential interest in the dam. Rogun PMG sent invitations several times by email. The email messages also included the Rogun PMG website with links to published ESIA documents. In addition, some CSOs from Uzbekistan and Turkmenistan whose telephone numbers were listed, received calls from the respective embassies of Tajikistan. The Bank is working with Rogun PMG to organize more consultations on the environmental and social aspects of the dam, including potential riparian impacts. International CSOs, including those your represent, will be invited to participate in the additional consultations planned on riparian issues.

All riparian countries have been notified of the proposed project and the notification process is not yet completed. As per World Bank Operational Policy (OP) 7.50, the Project Appraisal Document

will include a summary of the outcome of the notification process, and, where applicable, describe the salient features of any objection or independent expert report. Additional public consultations are being planned with riparian countries for the second half of 2024. Once a schedule has been set, the Stakeholder Engagement Plan will be updated accordingly and re-disclosed in-country, on the PMG and the World Bank’s external website.

III. Access to Project Information in Local Languages

For the national and community-level public disclosure meetings in January 2024, the project E&S consultant (WSP) prepared a leaflet and presentation, which PMG translated into Tajik and printed together with the Non-technical Summary (NTS) in Tajik. 1,500 leaflets and 300 NTS brochures were delivered by DFZ to affected communities in advance and distributed to all interested persons. Here is a photo of the leaflet and brochure, copies of which can be obtained by writing to: mdmmz@internet.ru.



To notify CSOs and interested residents about upcoming consultations, corresponding announcements and invitations were placed in local newspapers of 6 districts (in Tajik), as well as two invitations to upcoming meetings in Dushanbe in the republican newspapers Jumhuriyat and Narodnaya Gazeta (in Tajik and Russian). Announcements were placed for all 8 consultation meetings.

Before the meetings, appropriate banners (in Tajik) were installed in each settlement where consultations took place, informing the people about the venue and time of the meetings. At the beginning of the meetings, all participants were given folders (more than 400 sets in total) containing a leaflet, an agenda, a feedback form (for comments and/or complaints), a pen and a notebook for making notes. About 100 brochures were also distributed at the request of participants who had not received them earlier. Additionally, for potential cases of local power outages, 200

copies of the WSP presentation in Tajik were printed and subsequently distributed to consultation participants. The World Bank observed the consultations and WSP included two persons from the CSO Peshsaf as witnesses. In terms of materials which were shared at the January 2024 consultations, the resettlement booklet is attached to this letter. The NTS was translated into Tajik in early January 2024 and used in the consultations.

With respect to meeting ESS10 requirements, the consultations involve tens of thousands of project-affected people scattered in rural areas in the mountains. The government has also worked to make the grievance mechanism more systematic in receiving, processing and publicizing the grievance management process. The stakeholder engagement process is evolving and improving and the World Bank is confident that people are being informed about the project and can raise concerns through various means.

IV. Future plans

CSOs will be invited to join the international meetings with the riparian governments and they will have separate sessions where they can raise questions with the government officials, if they wish, and/or they can meet on their own. In addition, there will be consultations in the riparian countries and, if the CSOs wish, they can have consultations separately from the governments.

The World Bank, the E&S consultants (WSP) and the E&S Panel of Experts have been meeting project-affected people independently, with support from witness NGOs. We believe that people at the dam site can raise concerns about the environmental impacts of the dam, the resettlement process and challenges in livelihood restoration without retaliation. The government recognizes the profound impacts of the project on the communities and they have been working closely with them to solve issues on a case-by-case basis.

The World Bank firmly stands by its commitments to the people and the environment, and we welcome the cooperation of your organization and other CSOs as it enables the project to meet the high standards it deserves.

Please let us know if you have further questions.

Sincerely,



Tatiana Proskuryakova
Regional Director
Central Asia

CC:

Mr. Usmonali Usmonzoda, Deputy Prime Minister, Government of the Republic of Tajikistan;

Ms. Ozoda Rahmon, Head, Executive Office of the President of the Republic of Tajikistan;

Mr. Negmatullo Hikmatullozoda, Assistant to the President on Economic Issues, Executive Office of the President of the Republic of Tajikistan;

Mr. Parviz Davlatzoda, Head of International Relations Department, Executive Office of President of the Republic of Tajikistan;

Mr. Sirojiddin Muhridin, Minister, Ministry of Foreign Affairs of the Republic of Tajikistan;

Mr. Faiziddin Qahhorzoda, Minister, Ministry of Finance of the Republic of Tajikistan;

Mr. Pulod Mukhiddiniyon, Director, Projects Implementation Group of the Power Plant Construction under the President of the Republic of Tajikistan;

Mr. Davide Monguzzi, Senior Loan Officer Asia, The European Investment Bank;

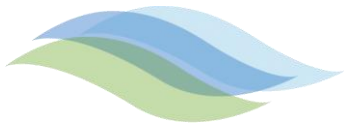
Mr. Emil Zalinyan, Senior Energy Specialist, The Asian Infrastructure Investment Bank;

Ms. Shanny Campbell, Country Director for Tajikistan, The Asian Development Bank;

Mr. Dominique Favre, Executive Director, the World Bank;

Mr. Joel Farronato, Advisor to Executive Director, the World Bank;

Mr. Ilhomjon Rajabov, Advisor to Executive Director, the World Bank.

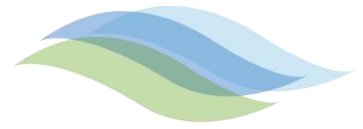


ШЕКАРАСЫЗ
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«Шекарасыз өзендер» Коғамдық қоры
Общественный фонд «Реки без границ»

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ҚР, 050060, Алматы, Өбіш Кеңілбайұлы атындағы көше, 34, бөлме 28
РК, 050060, Алматы, ул. Абиша Кеңілбайұлы, 34 оф.28



РЕКИ БЕЗ ГРАНИЦ

March 28, 2024

Re: the World Bank response to the CSO letter on Rogun HPP Project (Jan 18)

To: Rogun HPP Project TTLs

Dear Mr. Trimble and Mr. Berlengiero:

Our inquiry follows a recent response of the World Bank to our letter sent to you on January 18, 2024 with a request for robust and open regional public consultations on Rogun HPP Project ESIA and other E&P documentation.

The letter signed by Ms. Tatiana Proskuryakova, dated March 6, sent almost 50 days after our inquiry, contains a number of provisions which we cannot understand and need clarifications:

I. **Disclosure of E&S documents.**

Ms. Proskuryakova insists that the “Rogun HPP Environmental and Social Impact Assessment (ESIA) was thoroughly updated and published as a draft on December 22, 2023 (English and Russian versions available publicly:

<http://www.energyprojects.tj/index.php/en/rogun-hpp/eko-sots-instrument>;
<http://energyprojects.tj/index.php/ru/rogunskaya-ges/eko-sots-instrument>.”

- 1.1. We must confess that the last ESIA files published on January 19 on that resource notably differ from only two documents (ESIA and ESMP) published on the web-site of the WB Project P181029 “Sustainable financing of Rogun”, while some additional E&S documentation is published on the web-site of the WB Project P178819 “Technical Assistance for financing Framework of Rogun”. Contents of all three web-sites differ, making it impossible for the members of the public to understand what are the valid disclosable E&S materials available for consultation. Please, advise which one web-site we should trust when analysing documentation?
- 1.2. The ESIA Vol.I contains a list of disclosable documents, which we assume are subject to public consultation and must be disclosed at the beginning of consultation period for ESIA. Despite “disclosure period” starting on December 22, 2024, much of documentation was disclosed months later, and still the most important environmental and social-related documents have not been disclosed yet, **including Volume 2 of the ESIA (annexes with actual detailed impact assessments), the resettlement policy framework and resettlement action plan (RAP), biodiversity management plan, Environmental and social commitment plan (binding)**. Please, advise, where the public can obtain valid versions of those documents recognized by the World Bank as suitable for consultation purposes.
- 1.3. Also, please, advise us, at what date you expect the “upgraded” **Cumulative Impact Assessment** (intrinsic part of the ESIA) to be disclosed for public consultation among civil society members of riparian countries?
- 1.4. We are also greatly concerned with the fact that reports from the two expert panels hired to supervise the project and ensure its quality and transparency are regularly

produced, but not disclosed to the public. We would like to receive from You those reports and see them published on the WB-authorized web-site promptly.

II. Stakeholder Engagement and Public Consultations.

Ms.Proskuryakova informed us that the Project held information-sharing and consultation meetings with riparian governments and CSOs on Rogun HPP's updated ESIA in Almaty, Kazakhstan, on November 8-9, 2023.

- 2.1. What legitimate E&S information was that event based on given that first parts of the official draft ESIA have been disclosed only on December 22?
- 2.2. Have all riparian countries conformed their "no objection" to the project and which report contains information about it?
- 2.3. Through which public information channels had a small number of NGOs allegedly participating in the Nov.9 meeting learned about this event, given that we cannot find any public announcement about such riparian consultations and no information on those events in any media except for the "report" on the PMG's web-site?
- 2.4. In the light of questions above when do you anticipate the end of comment period on the ESIA?
- 2.5. Does the Project plan any new public consultation events for civil society members from riparian countries of the Aral Sea basin?

III. Access to Project Information in Local Languages.

Ms.Proskuryakova informed us that in January 2024, the PMG hosted a series of national and community-level public disclosure meetings in Dushanbe and various other locations in Tajikistan. She also sent us a link to the Non-technical summary available in Tajik language and promised that "the ESIA and ESMP are being translated into Tajik (in addition to the English and Russian versions already available), and the final versions of the ESIA and ESMP will also be made available in English, Russian and Tajik."

- 3.1. Are You satisfied with the fact that ESIA, ESMP and crucial supporting documents such as resettlement policy and plans were NOT available to Tajik-speaking participants at the time of local consultations and during the commenting period?
- 3.2. The WB letter insists that at the time of local meetings the DEZ and PMG disseminated brochures in Tajik providing information about the resettlement and the Grievance Redress Mechanism (GRM). May we ask to send us digital copies of those publications?
- 3.3. Examination of the NTS document in Tajik has revealed that its creation date is in February, so it could not be used to inform participants of local consultations in January either.
- 3.4. Besides, the NTS document is used in Tajik-language section of the PMG web-site which did not contain announcement about the public consultation meetings (somehow feature only on Russian and English-language web-sites). Even if any similar NTS document was available in Tajik, there is no link to it in announcements about the public consultation meetings, which invite participants to read ESIA information in Russian and English.
- 3.5. Do You consider such public information procedures as satisfying the ESS10 requirements?

IV. Future plan

According to Ms.Proskuryakova : "PMG and DFZ plan to hold more consultations throughout 2024, with (i) the communities directly affected by the dam to determine development needs at a nationwide level during the design and implementation phases of the benefit-sharing program; and (ii) riparian countries (precise dates under discussion). Those consultations will continue to involve CSOs and scientific organizations."

4.1. Such wording leaves us with an impression, that government officials of riparian countries, CSOs and scientific organizations will be forced to participate in the same consultation events, which is a bad practice in general. CSOs should have choice of separate consultations where they are not threatened by governmental officials and project proponents

4.2. In particular, we want to know what specific efforts the World Bank is making to safely collect feedback from affected groups, which justifiably fear retaliation from authoritarian government?

We hope to get from you a prompt response on the 16 questions we raised above.
Previous correspondence attached to this letter.

Thank you for understanding
Sincerely,

Eugene Simonov, Doctor of Conservation
Chief expert,
Rivers without Boundaries, Kazakhstan.