

TATIANA PROSKURYAKOVA  
Country Director  
Central Asia

October 22, 2024

ALEXANDER KOLOTOV  
Director  
Rivers without Boundaries Public Fund

**Re: Rogun Hydroelectric Power Plant (HPP) Project consultations and the new version of the Resettlement and Livelihood Restoration Framework (RLRF)**

Dear Mr. Kolotov,

Thank you for your letter dated July 4, 2024, concerning stakeholder consultations and the RLRF. We appreciate the continued interest of your organization in the Rogun HPP and remain committed to dialogue with Civil Society Organizations (CSOs), recognizing the critical role that organizations like yours play in enhancing accountability and transparency of such projects.

This letter is being sent by the World Bank on behalf of itself, the Asian Infrastructure Investment Bank (AIIB), and other potential cofinancing partners that get letters with similar concerns.

First, we would like to thank you for your participation in the stakeholder consultations organized by the Rogun Project Management Group (PMG) and the Directorate of the Flood Zone of Rogun HPP (DFZ) on June 30, 2024. The Rogun PMG and DFZ, as well as the World Bank staff present at the consultation, regret that you experienced technical issues during the meeting. We are following up with the DFZ on organizing more effective virtual meetings in the future to ensure all participants can fully participate. We appreciate your patience and understanding.

Regarding the timing of the meeting, the organizers note that no requests to change the session time were received in response to the invitation letters. We understand that the Government of Tajikistan will consider adjusting the time or planning additional sessions to accommodate participants from different time zones in future consultations.

Despite the technical difficulties, the meeting Minutes should reflect all the questions posed during the consultation. If any questions are missing, please let us know, and we will ask the Rogun PMG and DFZ to update the Minutes and the Stakeholder Engagement Plan accordingly. DFZ has assured us that the presentation was shared with the meeting participants. The Minutes are included in the updated Stakeholder Engagement Plan (SEP), which has been posted at [energyprojects.tj](http://energyprojects.tj) If you have not received a copy of the Minutes, please contact DFZ at [info@mmz.nbo-rogun.tj](mailto:info@mmz.nbo-rogun.tj).

The meeting does not reflect the overall breadth and quality of other local stakeholder consultations, which have included town halls and household-level discussions, with numerous regular interactions and ample opportunities for raising concerns and making complaints. Project-affected people (PAPs) and other interested stakeholders have been actively utilizing these available channels to voice their concerns and complaints, and the World Bank has taken part in larger consultations, as well as in interactions with PAPs as they have been raising concerns about various aspects of the resettlement and compensation process.

For future consultations concerning the environmental and social instruments, the Rogun PMG will provide notifications on their [website](#) and reach out to local and international NGOs/CSOs. This will include consultations on the final Environmental and Social Impact Assessment (ESIA) and its Cumulative Impact

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Assessment (CIA), the Environmental and Social Management Plan (ESMP), the Biodiversity Management Plan, the Resettlement Action Plan 2 (RAP 2), the Livelihood Restoration Plan 2 (LRP 2), as well as further consultations in the neighboring states on riparian issues. We are also working with the Rogun PMG on organizing consultations with governments and NGOs/CSOs in riparian countries in October-November. Please contact the Rogun PMG directly at [pmg@energyprojects.tj](mailto:pmg@energyprojects.tj) to confirm your interest in the forthcoming consultations. In addition, we are planning a meeting in November 2024 to further discuss environmental and social issues with international NGOs/CSOs, and your organization will be invited to participate.

As we have explained before, the World Bank is considering support for this ongoing project, which will include support for the second phase of resettlement. DFZ has been implementing this phase of resettlement using RAP 1, which was prepared under the World Bank's Operational Policy on Involuntary Resettlement (OP 4.12). In June 2024, the Government of Tajikistan adopted the Resettlement and Livelihood Restoration Framework, which sets out the principles for resettlement, and compensation for physical and economic displacement and livelihood restoration, in accordance with the requirements of World Bank Environmental and Social Framework's Standard 5 (Land Acquisition, Restrictions of Land Use and Involuntary Resettlement), and the Government is now preparing a RAP 2 and LRP 2 in line with the requirements of this standard. These instruments are expected to be disclosed for consultations later this year. The finalization and adoption of these two instruments by the Government of Tajikistan is a condition of effectiveness for financing the project.

Households may be compensated for physical displacement, economic displacement, or both. RAP 2/LRP 2 will include a breakdown of the types of PAPs. According to DFZ reports, the average amount of compensation for houses and structures to date has been in the range from 180,000 to 230,000 Tajikistan Somoni (TJS). The budget estimate provided in Table 11-2 of the RLRf was based on the assessment of assets to date and will be updated in RAP 2. As indicated in Table 7.3, Entitlement Matrix, Item A-1, compensation for houses and structures will be paid according to the appraiser within six and no later than twelve months, adjusted for inflation if necessary. Similarly, compensation for economic displacement will include land and livelihood restoration measures, as set out in the RLRf. Subject to the requirements of the Resettlement and Livelihood Restoration Framework (RLRF), additional funding may be provided to address any deficiencies in compensation.

We understand your concern about the feasibility of resettling the remaining 70% of people within the remaining year of the second phase of resettlement. Acknowledging the importance of completing the resettlement in a sustainable manner and with due consideration for the rights and well-being of the affected population, DFZ has already indicated they will need more time to complete the resettlement process—i.e. completion date has been revised from December 2025 to December 2026 and the RAP 2 will be extended accordingly. DFZ is in the process of appropriating resources to complete this phase of resettlement.

At the same time, it is important to note that significant progress has been made in resettling the rest of the villages. Here is a summary of resettlement provided by DFZ on the second phase:

1. **Fully Resettled Villages:** DFZ has completely resettled 6 out of 16 villages under the current second phase of resettlement. These villages are Sicharog, Sari Pul, Furudgoh, Sayidon, Chanor, and Makhallai Poyon.
2. **Four Villages in the Process of Resettlement:**
  - Roguni Poyon, Obi Boriki Poyon, and Obi Boriki Bolo: 50-60% of the population is being resettled at present.
  - Mehrobod (former administrative center of Komsomolobod district): 20% of the population is being resettled at present.
3. **Land Allocation and Ongoing Processes in remaining six villages:**
  - DFZ has provided land plots to the population of 3 villages (Hakimii Bolo, Hakimii Poyon, Lughuri Poyon) in the new settlements.

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- For the remaining 3 villages (Aligalaboni Bolo, Khumrogh, Bedikho), DFZ is in the process of selecting land for new places of residence and compiling a list of the people to be resettled.

Regarding the number of people to be resettled, each RAP will include the finalized number of PAPs, taking into consideration any adjustments due to finalized resettlement requirements and population changes over time. RAP 1 resettled 2,697 PAPs. RAP 2 will involve 16,919 PAPs and the current estimate for PAPs to be resettled after the second phase is 30,651 people. The total number of PAPs is 50,267, though this number may increase to as many as 60,000 PAPs by the end of the resettlement process, given growing local populations over time and the return of migrant workers.

Regarding potential downstream impacts, we would like to clarify that, as stated in the 2014 and the 2023 updated ESIA, Tajikistan will continue to adhere to the international agreements and regional water sharing arrangements. The average annual filling of the Rogun reservoir will be done using the unused share of Tajikistan's water allocation under the regional agreements. This unused share has been on average 1.2 billion cubic meters per year, which represents about 6 percent of the Vakhsh River's annual flow and about 1.6 percent of the entire Amu Darya Basin flow. Thus, Tajikistan will not use more water for reservoir filling than the otherwise unused amount from its national allocated share as agreed under existing regional agreements and procedures and will not shift more water from summer to winter than is already shifted by Nurek HPP operations. The primary change in the cascade will be that storage regulation will be done largely by Rogun HPP instead of by Nurek HPP, while the Nurek reservoir will be kept at a more or less stable level throughout the year. The two reservoirs at Rogun and Nurek will be conjunctively operated in line with the regional water sharing arrangements. Therefore, for downstream water users, there will be no appreciable change in water availability compared to historic flow patterns.

Moreover, the work conducted during the preparation of the draft ESIA and the findings of the Environmental and Social Panel of Experts confirm that water flows during the impoundment/filling phase and the operation of Rogun HPP will not be altered to a degree that would cause appreciable harm to riparian countries. This conclusion takes into account existing operating procedures of Nurek HPP, the Rogun reservoir filling schedule, the operating rules to be developed through the Project, and the monitoring systems to be financed to mitigate any potential impacts.

Finally, we understand that the Rogun PMG is working on the technical data, graphs, charts, and maps to be included in "Volume II" of the ESIA. As the ESIA/ESMP is being finalized, we expect this work to be completed in several months.

Thank you once again for reaching out with your concerns. We look forward to continued engagement with your organization and other stakeholders.

Sincerely,

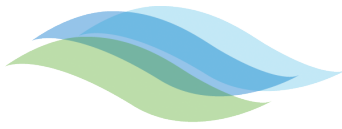


Tatiana Proskuryakova  
Regional Director  
Central Asia

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;  
Mr. Shanny Campbell, Country Director for Tajikistan, The Asian Development Bank;  
Ms. Beatrice MASER, Executive Director, the World Bank  
Mr. Mariusz Krukowski, Alternate Executive Director, the World Bank  
Ms. Simone Droz, Advisor to Executive Director, the World Bank  
Mr. Pairav Amirzoda, Advisor to Executive Director, the World Bank



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RIVERS WITHOUT  
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Ref. № RwBK-240704-1  
Date: July 04, 2024

TO:  
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World Bank Regional Director for Central Asia

CC:  
Rogun HPP ESIA <esia.rogun.hpp@gmail.com>  
Asian Infrastructure Investment Bank (AIIB)  
Civil society groups and international agencies interested in regional consultations

## **Re: Rogun HPP Project consultations and the new version of the RLRf**

Dear Ms. Tatiana Proskuryakova

Dear TTLs of the Rogun HPP Project

In the response to the RwB and sent on May 14, you kindly informed us that the World 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."*

### **Consultation Management Problems**

On May 30-several international NGOs received invitations to participate in "consultations on resettlement policy" on June 6 in Dushanbe and urged to request a link for the zoom meeting. While we were truly excited to be invited to such a meeting, we must share with you our observations and remaining questions.

A consultation session scheduled at 9 a.m. Tajikistan time effectively cut off any participants based in Europe, so only ones based in Asia could participate. Only two from among 10+ invited international organizations could attend the consultations meeting.

As we zoomed-in we were shown a room with 20 people seated, who were listening to a presentation in Tajik language delivered, presumably, by the Directorate of Flooding Zone (DFZ). Presentation was not shown in ZOOM.

Several participants requested translation and demonstration of the presentation in ZOOM. On the 28<sup>th</sup> minute the organizers tried to show a presentation in English, but failed as they could show only a title page. We requested repeatedly by writing in the chat, by email and orally in Zoom to send us the English language presentation by email, so we can refine our questions. Organizers promised to do so but presentation has never reached our mailboxes.

No translation was provided for a whole hour up to the Q&A session. During the Q&A session sound was intermittent and the translation (at least the part done from English into Russian) was grossly inaccurate. We had to clarify each of three questions asked 2-3 times and still got only partial inadequate answers. Therefore, we deprived of opportunity to get answers to all

important questions that we prepared. We also opted not to make statements regarding our main concerns related to the Resettlement and Livelihood Restoration Framework (RLRF), as their meaning would be inevitably corrupted given quality of translation and problems with sound. We also could not understand comments made by other consultation participants present in-person.

We must note that such a form of conducting consultation with invited international participants is not only insulting, but also grossly unprofessional. It does not allow interested stakeholders to express their position and get adequate answers to their questions. It shows that the staff of the Rogun TA project, which has been running for two years and, allegedly, conducted dozens of consultations, has no skills, technical capacity and even actual intention to organize consultations in professional and equitable manner.

We hope that problems described above could be resolved and the future consultations will be organized properly, in an equitable manner and with a good forewarning period.

We would like to take part in consultation organized for other recently disclosed documents such as

- The Environmental and Social Commitment Plan (ESCP)
- The Biodiversity Management Plan
- The Cumulative Impact Assessment
- The Stakeholder Engagement Plan, etc.
- The Riparian Consultations on Updated ESIA and ESMP

### **RLRF-unanswered questions**

Due to the problems described above we did not get answers to several key questions on resettlement. After consulting the new version of the Resettlement and Livelihood Restoration Framework (RLRF) document posted on June 23, we refined them and would like to get answers in writing.

**Question 1.** RLR document refers to Resettlement Action Plan (RAP2) and Guide to Land Acquisition and Compensation (GLAC) to be released soon. Given that the RAP2 started in 2017 and will end in 2025, should we assume it is being implemented without a formal plan and Guidelines accessible to stakeholders?

When will the RAP2 document be released and undergo consultations?

**Question 2.** The DFZ staff confirmed that currently issued compensation to resettled people is "too small", but failed to quote indicative figures.

How much is an average compensation for a person who lost a house and land?

In our reading of Table 11-2, USD 26 million is available to compensate 17 000 people (1605 households) which comes to USD 1530 per person or 15000 per household. What is the evidence that it is sufficient to rebuild a house and related assets and restore livelihoods in a new place?

**Question 3.** The reservoir when filled will create great numbers of economically displaced people, who will still live around it. Where in RLR can we find any estimates of numbers and distribution of economically displaced people, who do not lose houses, but are deprived of agricultural land, transportation, pastures, and other amenities due to reservoir filling. Who and how compensates their losses based on what procedures and regulations?

**Question 4.** What compensation procedure is available to people downstream of Vakhsh Cascade in Turkmenistan, Afghanistan and Uzbekistan in case they will be negatively affected by water shortages or other impacts of the Rogun HPP Project?

**Question 5.** The RAP, which started in 2017 and continues till 2025, will address the relocation of around 1,710 households (16,919 PAPs). As of January 2024, about 455 households (4,682 PAPs) have been relocated in RAP2. We failed to find in the RLRf and elsewhere any explanation how remaining 70% of people could be safely resettled within the remaining year, while in previous 7 years only 25% have been resettled. We suspect it is highly unsustainable plan with extreme risks of human rights violation (e.g. forced eviction).

**Question 6.** The number of people to be resettled in recent project documents increased from 42 thousand to more than 50 thousand. The DFZ staff told us, that reason for that is the high birth rate of 2-3%. Given that resettlement will continue for next 10-15 years, why have not those figures been adjusted to incorporate children to be born over that period?

We also want to remind you that in Your letter sent April 16, 2024 You kindly informed us that the "*Volume II of the Environmental and Social Impact Assessment (ESIA) is being finalized and will be disclosed shortly*" on the World Bank website. Please, clarify, when this disclosure is planned.

Without actual detailed assessment materials it is very difficult to determine the basis for many qualitative judgements and conclusions presented in ESIA Volume, which is a technical summary devoid of key information.

Please respond to us to the following email address: [coalition@riverswithoutboundaries.org](mailto:coalition@riverswithoutboundaries.org),  
cc: [alex.kolotov@gmail.com](mailto:alex.kolotov@gmail.com)



Sincerely

Alexander Kolotov,

Director of **Rivers without Boundaries Public Fund**