

March 6, 2024

Mr. Alexander Kolotov
Director of Rivers without Boundaries
Public Fund

Re: Response letter on request for regional public consultations on the proposed Rogun Hydropower Project

Dear Mr. Kolotov,

Thank you for your letter dated January 18th, 2024, on the proposed Rogun Hydropower Project (Rogun HPP) and request for regional public consultations on the project's Environmental and Social Impact Assessment (ESIA) jointly with other members of the Rogun Coordination Group. Engagements with Civil Society Organizations (CSOs) are important to us and our work as we value the critical role that CSOs play in enhancing accountability and transparency.

This letter is being sent by the World Bank on behalf of itself and the following potential co-financiers of the Rogun HPP: the Asian Infrastructure Investment Bank (AIIB), the Asian Development Bank (ADB) and the European Investment Bank (EIB). It has been endorsed by these parties.

We appreciate the interest of your organization and that of your partner organizations in this proposed project. We see the Rogun HPP as having the potential to be a transformative clean energy project that will bring significant domestic and regional welfare and contribute to the decarbonization of regional power grids in Central Asia (CA), if it is managed under a sound macro-economic, commercial, and social and environmental sustainability frameworks. Once completed, the Rogun HPP is expected to provide 9.75 million people with access to affordable, reliable and sustainable electricity and reduce 1.14 Mt CO₂ per year during the lifetime of the project.

Adherence to the Environmental and Social Framework

We can assure you of our ongoing and unwavering commitment to meeting the standards and requirements of the World Bank's [Environmental and Social Framework \(ESF\)](#).

First, please let us clarify 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>). Should the project financing be approved by the World Bank's Board of Directors, the ESIA will be finalized and re-disclosed prior to the date of effectiveness of the proposed World Bank Project (P181029). Additional environmental and social (E&S) instruments and various studies recommended by the Dam Safety Panel of Experts (DSPoE) appointed for the Project will continue to be prepared and disclosed throughout the project preparation process and during implementation.

Stakeholder Engagement and Public Consultations

We would also like to bring to your attention to several public discussions and consultations that were recently organized by the Project Management Group for Energy Facilities Construction (PMG) at both the regional Central Asia level and Tajikistan country level.

Specifically, the PMG 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. The consultations brought together representatives of the regional governments, CSOs, and scientific organizations with the goal of soliciting feedback to inform project design and respond to any questions and concerns from a wide group of stakeholders from the riparian countries. Many of the issues raised in your letter were covered during those consultation meetings. For more detailed information regarding the issues discussed, please refer to the consultations' summary report through this link (<http://energyprojects.tj/index.php/en/rogun-hpp/eko-sots-instrument/1215-esia-riparian-consultation-summary>).

Furthermore, in January 2024, the PMG hosted a series of national and community-level public disclosure meetings in the capital Dushanbe and various other locations in Tajikistan, including the city of Rogun, other Districts of Republican Subordination, and the Khatlon Region. Please refer to the PMG website for the dates and locations of the meetings: <http://energyprojects.tj/index.php/en/publications>

Access to Project Information in Local Languages

The PMG and the Directorate of the Flooding Zone of the Rogun HPP (DFZ) has made the Non-Technical Summary of the ESIA available in the Tajik language (<http://energyprojects.tj/index.php/tj/nbo-ro-un/btei/1216-khulosai-ajritekhnik>) and, during local consultations, disseminated brochures in Tajik providing information about the resettlement and the Grievance Redress Mechanism (GRM). 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.

Future Plans

Additionally, please be informed that the Stakeholder Engagement Plan will be disclosed during the project appraisal stage. It is a live public document setting out the commitments of the PMG regarding stakeholder engagement, consultation and disclosure activities for the Rogun HPP through the entire cycle of the project.

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. Stakeholder involvement throughout the life cycle of initiatives and the program itself will help improve project design and implementation and increase empowerment, buy-in and trust from key stakeholders. This process will also build capacities, knowledge, and skills thus contributing to the effectiveness and sustainability of the program. The PMG can keep you apprised of these and other future consultations.

Finally, the Government of Tajikistan has agreed to implement a benefit-sharing program as part of the citizens' engagement in the project, whereby part of the project revenues from electricity sales will contribute to the sustainable socio-economic development of the local population, and the population of Tajikistan. Use of the funds provided to the benefit-sharing program from the Rogun HPP will be monitored for measurable outcomes.

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 enable 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:

NGO Forum on Asian Development Bank;

CEE Bankwatch Network;

Rogun Coordination Group;

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
ӨЗЕНДЕР

«Шекарасыз өзендер» Когамдык коры
Rivers without Boundaries Public Fund

БИН 230440031982

ҚР, 050060, Алматы, Өбіш Кекілбайұлы атындағы көше, 34, бөлме 28
Abish Kekilbayuly Street, 34, office 28, Almaty, Kazakhstan



RIVERS WITHOUT
BOUNDARIES

Ref. № RwbK-240118-1

Date: January 18, 2024

TO:
Ajay Banga
World Bank President

Antonella Bassani
World Bank Vice President, Europe and Central Asia

Tatiana Proskuryakova
World Bank Regional Director for Central Asia

CC:
World Bank Civil Society Unit
World Bank Tajikistan Country Office
Civil society groups and international agencies interested in regional consultations

Re: Rogun HPP Project deserves a large-scale public discussion

We are writing on behalf of the Rivers without Boundaries International Coalition, NGO Forum on ADB, CEE Bankwatch Network to bring to your attention specific concerns about the World Bank's^{1 2 3} and AIIB's^{4 5 6} recent support for the Rogun Hydropower Project and projects enabling its construction and viability. We request that wide regional public consultations be held for the Rogun Project ESIA and the World Bank and other members of the Rogun Coordination Group⁷ show greater openness and stand up to their ESG standards and public participation policies.

We are aware that to date, the World Bank and the AIIB have disbursed at least USD 15 million in grants enabling the Government of Tajikistan to undertake project preparation for the Rogun Hydropower Project (Rogun HPP), including for example, proposing measures to supposedly ensure it will come into compliance with required environmental and social safeguards. Recently from the [Concept Project Information Document](#)⁸ we

¹ P178819 Technical Assistance for Financing Framework for Rogun Hydropower Project (2023) <https://projects.worldbank.org/en/projects-operations/project-detail/P178819> ;

² P181029 Sustainable Financing for Rogun Hydropower Project (2024) <https://projects.worldbank.org/en/projects-operations/project-detail/P181029>

³ P145054, P181219, P167898 [Central Asia South Asia Electricity Transmission and Trade \(CASA-1000\) \(2014-2023\)](#)

⁴ Rogun Hydropower Development Project (project preparation grant 2023) <https://www.aiib.org/en/projects/details/2023/special-fund/Tajikistan-Rogun-Hydropower-Development-Project.html>

⁵ Obigarm-Nurobod road (project preparation 2019) <https://www.aiib.org/en/projects/details/2019/special-fund/Tajikistan-Obigarm-Nurobod-Road-Project.html>

⁶ <https://www.aiib.org/en/projects/details/2024/proposed/Tajikistan-Rogun-Hydropower-Development-Project-Phase-1.html>

⁷ The Rogun Coordination Group is led by the World Bank and includes European Union (EU), European Investment Bank (EIB), Asian Infrastructure Investment Bank (AIIB), Asian Development Bank (ADB), United States Agency for International Development (USAID) and the US Embassy in Tajikistan, Islamic Development Bank (IsDB), Eurasian Development Bank (EaDB), Kuwait Fund for Arab Economic Development, Saudi Fund for Development, UK Foreign, Commonwealth and Development Office, European Bank for Reconstruction and Development (EBRD), Italian Cassa di Risparmio di Venezia (CDP), and Kreditanstalt für Wiederaufbau (KfW).

⁸ <http://documents.worldbank.org/curated/en/099072123165041455/P1810290716f920e08543049a566c86b4c>

learned that the World Bank, AIIB as well as EIB each intend to devote at least USD 200 million to support Rogun Hydro, which completion still requires more than 6 billion dollars.

The Rogun HPP Project on the Vakhsh River is of great concern in and of itself because of the enormous associated social and environmental risks, not only to Tajikistan but to the region as a whole. However, even more concerning is the fact that there have been unequivocal attempts to limit region-wide stakeholder engagement in the ESIA consultations taken by the Rogun Hydropower Project Management. Specifically, for instance, we have seen that stakeholder engagement appears to have been limited to local communities only. However, there does not appear to be publicly available ESIA documents in Tajik language, which makes us doubt that genuine, open informed public consultations actually have already taken place locally.

The recently disclosed draft [ESIA for Rogun Hydro](#)⁹ mentions that between 2007 and 2014, the World Bank facilitated and hosted a structured consultation and information sharing program with all six riparian countries parallel to the 2014 ESIA. During this period (2007-14), the World Bank organized 5 (five) consultation meetings for riparian governments, civil society organizations, diplomats, and the development community. Sessions 1-3 and 5 were held in Almaty, while the 4th session was in Dushanbe. The purpose of the engagement program was to facilitate an opportunity for interested stakeholders to review the terms of reference for the ESIA alongside interim findings from the draft assessment studies.

That early consultation process was triggered by the need to discuss great concerns of the regional and international community related to water scarcity, rapid degradation of ecosystems in the Amu Darya River basin and growing competition for water resources. Over the 10 years that have passed since then, all of these objective factors have only intensified and become more complicated. As a result, we consider it absolutely critical to hold wide regional public consultations in all riparian countries with participation of representatives of relevant agencies, public organizations, and scientists and concerned citizens.

Results from public consultations that took place based on earlier versions of environmental and social impact assessments of the Rogun HPP project: prior to 2023 are now far too outdated to be considered valid. The reality is that since 2014, we have learned much more about the dynamics of climate change and efficient renewable energy sources, biodiversity crisis, impacts of resettlement and migration, consequences of growing sovereign debts for population, and other key issues. The ecological situation in the basin has drastically deteriorated. And today we see new potential impacts on the hydrological regime of the Amu-Darya River (e.g. construction of Qosh Tepa Canal in Afghanistan), while internationally recognized conservation sites are potentially threatened by the Rogun HPP project (significantly, for instance, the Tigrovaya Balka nature reserve, which preserves Vakhsh floodplain ecosystems, has become a UNESCO Natural World Heritage Site).

The potentially vast scale of transboundary impacts resulting from the development of the Rogun HPP project deserves the same scale of public discussions that was held in

⁹ <http://documents.worldbank.org/curated/en/09912223091529585/P1810291b43c970a71993e1a8e76ceb151c>

2014, not only in Tajikistan, but across the whole Central Asian region, with sessions in different Central Asian countries and participation of the general public and scientific organizations.

Specifically, we would propose that given the current context, there should be — at a minimum — open public discussions not in Tajikistan only, but also in Uzbekistan, Turkmenistan, Kyrgyzstan and Kazakhstan with the involvement of public and scientific organizations as well as international NGOs and agencies to ensure that all proposals and comments are fully taken into account in the final version of the Rogun HPP ESIA.

Moving forward, as a first step – if necessary – the “Rivers without Boundaries” Public Fund is ready to help in organizing a public consultation in Almaty, Kazakhstan.

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



Sincerely

Alexander Kolotov,

Director of **Rivers without Boundaries Public Fund**

Endorsed by:

NGO Forum on Asian Development Bank

CEE Bankwatch Network