

Tatiana Proskuryakova
Country Director
Central Asia

June 25, 2025

Mr. Alexander Kolotov
Director
Rivers Without Boundaries

Dear Mr. Kolotov,

Re.: Response letter on Kambarata-1 Hydropower Plant Project

Thank you for your letter dated June 23, 2025. We appreciate your engagement and the opportunity to address matters concerning the Kambarata-1 Hydropower Plant Project (K-1 HPP).

We would like to clarify that the K-1 HPP roundtable you referred to was not part of the formal consultation process. This was a technical meeting with government officials from Kazakhstan, Kyrgyz Republic, and Uzbekistan working on the project, World Bank staff and expert consultants within the context of the technical assistance [project](#). Much of the meeting was devoted to reviewing feasibility studies, discussing the commercial framework and options for a financing structure, as well as readiness of safeguards instruments such as the Environmental and Social Impact Assessment (ESIA) for disclosure for public consultation. The ESIA is the responsibility of the borrower and as such must be disclosed in accordance with the World Bank's Environmental and Social Framework.

As previously communicated, the second round of consultations will proceed as planned, as soon as the draft ESIA is finalized and ready for disclosure. As with the first round of consultations with civil society organizations that took place in Bishkek and online on November 19, 2024, the government will invite all relevant stakeholders, including Rivers without Boundaries.

We value your continued interest in the K-1 project. The World Bank remains committed to transparent stakeholder engagement and to supporting countries in pursuing sustainable development solutions.

We look forward to continued dialogue and appreciate your collaboration.

Thank you again for your letter.

Sincerely,



Tatiana Proskuryakova
Division Director
Central Asia

CC:

Mrs. Antonella Bassani, Vice President, Europe and Central Asia
Mr. Charles Cormier, Regional Infrastructure Director in Europe and Central Asia



ШЕКАРАСЫЗ
ӨЗЕНДЕР

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Rivers without Boundaries Public Fund

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RIVERS WITHOUT
BOUNDARIES

Ref. # *RwBK-250623-2*

Date: *June 23, 2025*

TO:

Antonella Bassani, Vice President, Europe and Central Asia,
Tatiana Proskuryakova, Regional Director for Central Asia, World Bank
CC: **Maksudjon Safarov**, **Hazuki Terada**, Project Team Leaders

Subject: **Kambarata HPP-1 Project: Consultation Process, Information Disclosure, and Compliance with International Obligations**

Dear Antonella,

Dear Tatiana:

The Rivers without Boundaries Public Fund, which focuses on the sustainable use of water resources and the protection of riverine ecosystems in a transboundary context, extends its respects and wishes to address you again concerning the implementation of the Kambarata HPP-1 construction project on the Naryn River in the Kyrgyz Republic. Given the significant potential impacts of this project on the Naryn River valley and water resources of the Syr Darya River basin, we have repeatedly identified ourselves as a key stakeholder.

We have learned from official sources in the Kyrgyz Republic (press release from the Ministry of Energy of the Kyrgyz Republic) that a roundtable discussion on the progress of the Kambarata HPP-1 project was held in Bishkek on June 18-19, 2025. At this event, as reported, with the participation of World Bank representatives, draft Feasibility Study (FS) and Environmental and Social Impact Assessment (ESIA) documents were presented and discussed.

Rivers without Boundaries PF, despite our expressed interest (our last email on Kambarata-1 Project public participation was forwarded to Project Management Office Ministry of Energy pmo.kgz@gmail.com on June 18, 2025), relevant expertise, and previous participation in initial consultations on this project (November 19, 2024), **did not receive an official invitation to the aforementioned key roundtable on June 18-19, 2025.**

Furthermore, we are extremely concerned that **the ESIA materials, including the draft presented at the said roundtable, have still not been timely and fully disclosed to the general public and interested parties.** Specifically, these documents are absent from the Kambarata HPP-1 project's official webpage on the World Bank's website.

Such actions by the World Bank's project management unit not only violate the World Bank's internal policies and procedures but also indicate possible non-compliance by the Kyrgyz Republic with its international obligations under two key conventions ratified by the country:

1. **The UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention):**

- **Violation of access to information (Articles 4 and 5):** The lack of timely and full disclosure of the draft ESIA and other relevant documents restricts the public's right to access environmental information. Information must be provided in a timely and effective manner.
 - **Violation of public participation (Articles 6 and 7):** Not inviting key interested NGOs to the ESIA discussion and the lack of access to documents makes effective public participation in decision-making on a project with significant environmental impact impossible. The public must have the opportunity to submit comments at an early stage when all options are still open.
2. **The UNECE Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention):**
- **Violation of notification and consultation procedures with affected Parties (Articles 3, 4, and 5):** Kambarata HPP-1 is a project with significant transboundary impacts. Kyrgyzstan, as the Party of origin, is obliged to notify potentially affected Parties (including Kazakhstan) about the project and provide them with relevant documentation, including the ESIA, for comments and consultations. The opacity of the process and lack of information for Kazakhstani NGOs indicate a possible breach of these obligations. The public of affected Parties must also have the opportunity to participate in EIA procedures.

This situation raises serious concerns for us regarding compliance with World Bank policy, particularly **Environmental and Social Standard ESS10: "Stakeholder Engagement and Information Disclosure"** and the **Bank Procedure: "Access to Information" (ECR4.01-PROC.135)**. We believe the following key WB principles and procedures may have been violated (see **Annex 1** below):

- Inadequate stakeholder identification and engagement (ESS10, paras 5, 10).
- Violation of timely and accessible information disclosure principles, including safeguard documents prepared by the borrower (ESS10, paras 19, 20; Access to Information Procedure, A-4.g.2).
- Failure to ensure meaningful consultation due to the lack of prior disclosed information (ESS10, para 22(d)).
- Non-compliance with disclosure procedures for project documents such as the Project Appraisal Document (PAD) and Factual Technical Documents (FTDs) (Access to Information Procedure, A-4.a.2, A-4.a.3).

In light of the above, Rivers without Boundaries PF respectfully requests the World Bank to:

1. Ensure the immediate and full disclosure of all current project documents for Kambarata HPP-1, including the complete texts of the draft FS and ESIA (with all annexes), on the World Bank's official website and through other publicly accessible channels, in accordance with the Bank Procedure: "Access to Information."

2. Provide official clarification regarding the criteria for selecting and inviting participants to the roundtable held on June 18-19, 2025, and the reasons why our organization was not invited.
3. Facilitate the organization and conduct of comprehensive, inclusive, and timely public consultations on the draft FS and ESIA for Kambarata HPP-1, not only in Kyrgyzstan but also in downstream countries, including Kazakhstan and Uzbekistan, providing sufficient time (at least 60 days after document publication) and all necessary materials for quality preparation and participation by interested parties, in line with the principles of the Aarhus and Espoo Conventions.
4. Ensure that the Stakeholder Engagement Plan (SEP) for this project is duly updated (so far, we have the edition of March 2023) and includes clear, effective, and transparent mechanisms for the constructive involvement of all stakeholders, including independent NGOs from project-affected countries, at all stages of project implementation.
5. Conduct an internal review of compliance with its own policies and procedures, as well as the Kyrgyz Republic's obligations under international conventions, in the preparation of the Kambarata HPP-1 project, and take measures to prevent similar violations in the future.

Rivers without Boundaries PF reaffirms its readiness for constructive dialogue and participation in the discussion of the Kambarata HPP-1 project to ensure its environmental and social sustainability and respect for public rights.

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**

ANNEX 1**List of Potential Violations of World Bank Policy
(ESS10 and Access to Information Procedure)
for the Kambarata HPP-1 Project**

Analysis of the Kambarata HPP-1 project situation, particularly the roundtable held on June 18-19, 2025, in Bishkek and preceding events, considering the provisions of **Environmental and Social Standard ESS10: "Stakeholder Engagement and Information Disclosure"** and the **Bank Procedure: "Access to Information" (ECR4.01-PROC.135, effective November 13, 2024)**, reveals the following potential violations:

- 1. Inadequate Stakeholder Identification and Engagement (ESS10, para 5, para 10; GN10.1, GN5.2):**
 - Rivers without Boundaries PF, a recognized stakeholder (especially as an "other interested party" given the project's transboundary nature, its expertise, and previous expressions of interest), was not invited to the key event – the roundtable on June 18-19, 2025, where draft final FS and ESIA documents were presented and discussed. This contradicts the principle of inclusive engagement.
- 2. Deficiencies in Engagement Planning and Implementation (ESS10, para 6, para 8, para 13, para 14; GN13.1, GN13.2, GN6.1):**
 - The failure to invite a key NGO to an important discussion indicates issues with the implementation of the Stakeholder Engagement Plan (SEP) or its incompleteness.
 - Engagement should be proportionate to the project's risks and impacts. For Kambarata HPP-1, as a large project with significant transboundary impacts, maximum broad and meaningful engagement is required.
- 3. Violation of Timely and Accessible Information Disclosure Principles (ESS10, para 8 (iii), para 19, para 20; GN19.1, GN19.5; Access to Information Procedure, Section A-4.g "Environmental & Social Safeguards"):**
 - ESIA materials (including the draft presented at the June 18-19, 2025 roundtable) were not disclosed in a timely and comprehensive manner to the public and interested parties, including Rivers without Boundaries PF.
 - The **Access to Information Procedure** (p. 40-41, A-4.g.2) states that "Safeguard documents prepared by the borrower (including environment reports, resettlement instruments, indigenous peoples' instruments, safeguard diagnostic reviews), which are made public as a condition for Bank financing." The absence of such documents on the WB website is a direct violation.
 - The **Access to Information Procedure** also details the disclosure of EA reports for Category A projects (p. 40, A-4.g.3, A-4.g.4). If Kambarata HPP-1 is Category A (highly likely for such a project), ESIA disclosure requirements are particularly stringent.
- 4. Failure to Ensure Meaningful Consultation (ESS10, para 7, para 21, para 22; GN4.2):**

- Excluding Rivers without Boundaries PF from the ESIA project discussion at a crucial stage deprives the organization of the opportunity to provide comments and contribute, undermining the "two-way process" principle of consultation.
 - Meaningful consultation requires prior disclosure of "relevant, transparent, objective, meaningful, and easily accessible information" (ESS10, para 22(d)), which was not done.
5. **Non-compliance with Documenting and Considering Views (ESS10, para 9; GN9.1):**
- If key stakeholders do not participate in consultations, their views and concerns cannot be properly documented and considered in project decision-making.
6. **Insufficient Engagement Throughout the Project Life Cycle (ESS10, para 6; GN6.1):**
- The principle of continuous engagement is violated if stakeholders are excluded at the stage of presenting and discussing "final" versions of key documents.
7. **Non-compliance with Disclosure Procedures for Project Documents (Access to Information Procedure, Section A-4.a "Investment Project Financing"):**
- **Project Appraisal Document (PAD)** (p. 27-28, A-4.a.3): If the borrower provides written consent, the PAD is subject to "Simultaneous Disclosure" prior to Board consideration. If such consent is not given or negotiations are not completed, the PAD is disclosed at the end of the Board's deliberative process. Information on the PAD disclosure status for Kambarata HPP-1 is missing.
 - **Factual Technical Documents (FTDs)** (p. 26, A-4.a.2): The procedure outlines three categories of FTDs, including those prepared by the Borrower, the Bank, or jointly. For all categories, consultations and approvals are required before disclosure. It is unclear if these procedures were followed for the technical documents underpinning the ESIA and FS.
8. **Ignoring the Transboundary Aspect in Stakeholder Engagement:**
- Although ESS10 and the Access to Information Procedure do not have specific detailed sections on transboundary consultations for all document types, the general principles of inclusivity, especially for WB-financed projects with transboundary impacts, imply active engagement of stakeholders from affected countries. The exclusion of a Kazakhstani NGO specializing in these issues is particularly concerning.