

Urgewald, Berlin
Rivers without Boundaries, Kazakhstan

April 16, 2024

**Re: Response letter to Urgewald and Rivers Without Boundaries
(letter received March 4, 2024)**

Dear Mr. Schäfer,

Thank you for your letter dated March 4th, 2024, on the Rogun Hydropower Project (Rogun HPP) and associated environmental, social, and geopolitical considerations. Engagements with Civil Society Organizations (CSOs) are important to us and our work as we value the critical role that they 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 to whom we understand you have also written: the Asian Infrastructure Investment Bank (AIIB), European Investment Bank (EIB), and the Asian Development Bank (ADB). It has been endorsed by these parties.

We appreciate the interest of your organization in this proposed project, and those on whose behalf your letter was written. 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). This includes aiming for transparency, thoroughness, and being evidence-based in the development of and implementation of the ESF, under the advice of independent panels of experts (one on dam safety aspects, and one on environmental and social aspects) as per best international practice. Per the flexibility offered under the ESF, documents will be disclosed for consultation as they become available (for example the the Resettlement and Livelihood Restoration Framework (RLRF) was published on April 11 2024¹, after your letter was sent). Volume II of the Environmental and Social Impact Assessment (ESIA) is being finalized and will be disclosed shortly, and we will ensure the report is available in the respective languages of the affected communities.

Stakeholder Engagement

¹ <http://energyprojects.tj/index.php/en/rogun-hpp/eko-sots-instrument/1230-for-consultations>

We greatly value stakeholder engagement and see it as an integral part of addressing environmental and social issues associated with the Rogun HPP. The World Bank and our partners are prioritizing consultations as part of project preparation, and we are working with the Government of Tajikistan to ensure adherence to international standards in this regard. The Stakeholder Engagement Plan for the project was disclosed on February 28, 2024², and will be continually updated to reflect the latest project developments.

As part of project preparation, the World Bank has worked with the Project Management Group (PMG) and Directorate of the Flooding Zone of Rogun HPP (DFZ) to improve their systems for consulting and engaging stakeholders, as well as addressing, recording and tracking any grievances on environmental and social issues, and proposed mitigation measures where feasible.

In addition, we would like to inform you that the PMG and DFZ are planning to hold more consultations throughout 2024 and will continue to involve CSOs and scientific organizations. We firmly believe that stakeholder involvement throughout the life cycle of the project will help improve project design and implementation and increase stakeholder empowerment and buy-in, as well as benefits to the affected communities. The PMG can keep you apprised of these and other future consultations.

Regional Decarbonization Efforts

One of the key benefits of Rogun HPP is the avoided CO₂ emissions of alternative generation required to meet electricity demand in the absence of Rogun HPP. The project will contribute to regional energy security and enable the expansion of exports of clean electricity to the broader region, which currently still largely depends on gas and coal-fired generation. Rogun HPP would contribute to a reduction in CO₂ emissions in the CA region through avoided emissions from fossil fuel generation in these countries.

We have provided responses to your questions in more detail in the attached document.

In conclusion, we would like to reiterate our commitment to helping Tajikistan maximize the benefits of the Rogun HPP for people at the local, national and regional levels, and to mitigate or address social and environmental issues that may arise. We welcome the cooperation of your organization and other CSOs and believe that 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

² <http://energyprojects.tj/index.php/en/rogun-hpp/eko-sots-instrument/1224-stakeholder-engagement-plan1>

Detailed Response to CSOs on Rogun Hydropower Project HPP

Geopolitical risks and downstream flow regime. We understand the concerns regarding the Rogun HPP Project and its potential social and environmental risks. It is important to note that the geopolitical tensions your letter mentions have shifted considerably over the past decade. Tajikistan has repeatedly stated its commitment to international agreements, ensuring that transboundary water management is respected and protected. That said, the key issues were addressed in the Techno-Economic Assessment Study for the Rogun Hydroelectric Construction Study of 2014 financed by the World Bank. More recently, the Technical Assistance for Financing Framework for Rogun Hydropower Project, which was approved by the Board in December 2023, finances independent panels of expert on dam safety and environmental and social safeguards to provide independent advice on these issues to the Government of Tajikistan.

With this background, the Rogun HPP has been designed with careful consideration of its impact on the downstream flow regime. Assessments have indicated that the project will not result in changes (including “dramatic changes”) to downstream flows. Instead, it is expected to offer substantial benefits, such as a significant reduction in flood risk. This is achieved by enhancing the protection of the Nurek HPP and downstream areas from extreme flood events, such as the Probable Maximum Flood, thereby contributing to regional safety and stability. Consultations on riparian issues are part of the Stakeholder Engagement which is further addressed below.

Stakeholder Engagement. Stakeholder engagement is an integral part of addressing environmental and social issues associated with any project, including Rogun HPP. The World Bank and our partners take this part of project preparation with extra care, and we work with the Government of Tajikistan to adhere to the highest standards in this regard. The Stakeholder Engagement Plan for the project has been disclosed.

The project has been under implementation for some time and there have been ongoing consultations with the project-affected people (PAPs), as they were resettled from their homes to new locations. As part of project preparation, the World Bank has worked with the Project Management Group (PMG) and Directorate of the Flooding Zone of Rogun HPP (DFZ) to improve their systems for consulting and engaging stakeholders, as well as addressing, recording and tracking any grievances on environmental and social issues.

In our previous response letter, dated March 6th, 2024, we had shared information on a number of consultations, held at regional, national and local community levels since November 2023. We trust you have been able to access the summary report from the regional consultations in Almaty organized by the PMG on November 8-9th, 2023, bringing together representatives of the regional governments, CSOs, and scientific organizations. The summary report captures many of the issues raised in your letter and can be accessed at <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>.

In addition, we would like to inform you that the PMG and DFZ are planning to hold more consultations throughout 2024, these will include: i) consultations with the communities

directly affected by the dam; and ii) consultations with riparian countries (precise dates under discussion). Consultations will continue to involve CSOs and scientific organizations. We firmly believe that stakeholder involvement throughout the life cycle of initiatives and the project 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.

It is important to note that the consultation and stakeholder engagement are an ongoing process and by no means concluded. PMG and DFZ will continue to consult PAPs and others interested in or affected by the dam throughout the life of the project. Likewise, the Stakeholder Engagement Plan (SEP) is a living document, which will be continuously adjusted and expanded to include not only key points from consultations and stakeholder engagement activities, but a feedback process for the project.

Regarding the comment that the SEP contains incorrect information on mandatory disclosure, we would be grateful if you could provide more information on this. If there are mistakes, PMG will correct them.

Environmental and Social Impact Assessment (ESIA)

We are committed to transparency and thoroughness in our environmental and social assessments. We aim to ensure that the final ESIA document is cohesive and supported by evidence. Volume II is being finalized and will be disclosed shortly. We will ensure the report is available in the respective languages of the affected communities.

To assure you of our commitment, we would like to share a detailed overview of what has been done as part of the ESIA. Building on the impact assessment conducted in 2014, the E&S team has undertaken numerous field surveys and site visits to update and cross-validate the findings, including:

- Air quality: (a) spot samples of particulate matter (PM10) collected during a site visit in May 2023, using a hand-held light scattering laser photometer that provided real-time aerosol mass concentrations, (b) visual assessment of visible dust generated aboveground and the deep haze underground in tunnels for powerhouse and other access tunnels.
- Noise: A noise survey was undertaken at six key locations within the site on 2 and 3 May 2023, to evaluate the existing sound climate at both the site and nearby identified noise sensitive receptors, as well as to determine any existing noise sources.
- Soil and Geology: (a) A WSP generalist team visited the project site and provided the soils specialist team with photographs and descriptions of the project site, (b) a WSP soil scientist visited the area of the project site centered on the dam wall, (c) Slope calculation was undertaken using ArcGIS Desktop and Spatial Analyst extension, using a slope tool to calculate various slope in degree.
- Contaminated Land: WSP attended the site between September 4 and 8, 2023, to review areas of potential concern identified during a review of existing information and areas identified at the time of the site walkover.
- Water Quantity: Compiled annual average water flow in Vakhsh River from 1932 to 2022 (Tajikgromet data, from 1993 calculated as per Nurek HPP data).
- Water Quality: Spot monitoring by WSP in 2023.
- Traffic: Secondary data obtained from the Tajikistan Ministry of Transport Roads and Highways of Rogun City (January 1, 2023).

- **Biodiversity:** Surveys in the vicinity of the Project were undertaken across 15 representative sampling sites. eDNA was carried out in September-October 2023 (results pending).
- **Cultural Heritage:** Preliminary archaeology and ethnographic surveys undertaken by the team at the A. Donish Institute of History, Archaeology and Ethnography in June, August and September 2023.
- **Slope Stability:** Photographs and video recorded during the site visit by the WSP team reported in March 2023.

Cumulative Impacts Assessment (CIA). The ESIA published included a Rapid CIA as a starting point. However, we agreed that a detailed CIA is critical for a project of this magnitude and importance. As a result, an international consultant has been appointed to prepare the detailed CIA, including a more in-depth evaluation of downstream issues.

The scope of the ESIA. The Rogun HPP is designed to operate in conjunction with the Nurek HPP, whereby Nurek HPP becomes a run-of-river operation and Rogun HPP assumes the regulation function. Assessments have concluded (ESIA, Chapter 8) that Rogun HPP is not expected to alter the flow regime for downstream of Vakhsh River, either in Tajikistan or in riparian countries, as the Government of Tajikistan will maintain its commitment to adhere to existing water sharing arrangements that determine annual allocations and seasonal shifts. Moreover, Rogun HPP will provide some benefit by being able to withstand the Probable Maximum Flood, which Nurek HPP and the other dams in the cascade are not designed to do. Nonetheless, the detailed CIA under preparation will take into account impacts downstream from the Nurek dam.

Tajikistan intends to make use of its full water share of 9.5 km³ per year, as assigned under the Nukus declaration and Protocol 566, to fill both the Rogun dam reservoir and provide for its other water demands. Historically, Tajikistan has not used on average 1.2 km³ of its water share, which could be made available to fill the Rogun dam reservoir. Modelling of the reservoir filling period estimated it would take 16 years to reach a full surface level of 1,290 masl under the intended filling regime. Considering the total storage volume is 13.3 km³ the average annual rate of water retention was shown to be 0.83 km³. In the initial filling phase, the annual water volume retained would be limited by the rate of dam construction, while in the later stages it would be possible to store more water than the average annual 1.2 km³ of Tajikistan's unused water share.

To avoid adverse impacts on the downstream irrigation users in dry years during Rogun filling phase, the ESIA recommended that Tajikistan should commit to reduce or not retain additional water at Rogun Dam depending on the severity of the drought. As a compensation measure, it is suggested that during wet years more water should be retained within Rogun reservoir. These recommendations will be implemented under the agreed water retention regime for Rogun reservoir, so that the filling of the dam will not adversely affect downstream water users during dry years.

Assessment of flows. We would like to inform you that the TEAS reviewed various options and arrived at the current proposed flow regulation regime because it optimizes the protection of downstream users and timing of power generation. It is important to note that Tajikistan is foregoing significant opportunities for earlier power generation by delaying the achievement of full supply level in the reservoir.

Assessment on hydrology, sedimentation and climate impacts was taken into account during the TEAS and conservative parameters were used in the designs. These parameters

were reviewed by the independent Dam Safety Panel of Experts (DSPOE) appointed in 2022 in the framework of the ongoing Technical Assistance project³, and considered appropriate. Based on DSPOE suggestions, these studies will be updated to take into account developments during the period that has elapsed since the completion of the TEAS.

Biodiversity. Although the construction of the Nurek dam, well before the Rogun was conceived, had already impacted the Tigrovaya Balka Nature Reserve, the CIA currently being carried out will review and update the 2014 assessment. In terms of mitigations, the World Bank has a project under preparation called the Tajikistan Resilient Landscape Restoration Project (RESILAND), which provides support to the Nature Reserve and 3 other protected areas. The support is mainly for preparation of management plans and in addition: (i) remote and field-based monitoring with community participation, for example, camera traps and censuses of key species; (ii) small-scale interpretation of protected area assets and attractions for visitors, for example, signage, exhibits, and so on; (iii) restoration of degraded natural land-based habitats through small-scale afforestation and natural regeneration and conservation of wildlife grazing areas for key species, for example, Bukhara deer, Marco Polo sheep, and ibex (identified as affected by upward and downward slope movements due to climate change), (iv) pilot measures to resolve human-wildlife conflicts; and (v) preparation of management tools, for example, digital resources and tourist maps. The project coverage includes the Tigrovaya Balka Nature Reserve in its scope.

The Resettlement and Livelihood Restoration Framework (RLRF) was disclosed on April 1, 2024 as a draft for consultations at the World Bank's external website and will be disclosed shortly in-country. It will be consulted upon and re-disclosed. The Resettlement Action Plan 2/Livelihood Restoration Plan 2 (RAP 2/LRP 2) are under preparation and will also be disclosed and consulted upon. The RLRF describes the resettlement to date, including lessons learned, and provides guidance for RAP 2/LRP 2, as well as future RAPs. It includes a requirement to check that the ongoing compensation and livelihood measures meet the requirements of World Bank Environmental and Social Standard 5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement).

Resettlement and Grievance Plans. It is important to understand that the second phase of resettlement has been ongoing since 2017 without the World Bank's financing. To date, some 2,700 PAPs were resettled under RAP 1 and about 4,700 PAPs have been resettled to date during the second phase of resettlement, with another 12,000+ who are in the process of being resettled. The PAPs have either been resettled to new communities or to existing communities. The DFZ has been adhering to national law and the entitlement matrix of RAP 1, which was found to be compliant with the requirements of the World Bank's Operation Policy on Involuntary Resettlement (OP 4.12). A Grievance Redress Mechanism is in place and PAPs have been using it to raise concerns about the resettlement process and their entitlements.

Regional Decarbonization. The statement concerning Rogun's potential to contribute to regional decarbonization in Central Asia is based on detailed power system models, which were developed for Tajikistan and for the Central Asia region. One of the key benefits of Rogun HPP is the avoided cost (and associated CO2 emissions) of alternative generation required to meet electricity demand in the absence of Rogun HPP. Without the Project, between 2024-2050, Tajikistan would need to construct a new 250 MW gas-fired thermal combined cycle gas turbine plant (CCGT), 2,900 MW of solar PV, and 600 MW of wind projects to replace electricity generation from the Rogun HPP. Avoided CO2 emissions are increased further as

³ Technical assistance for financing framework for Rogun HPP (P178819).

the result of avoided alternative generation in the sub-region (e.g., for the period 2023-2050, 20 mt/CO₂ in Kazakhstan, and 12 mt/CO₂ in Uzbekistan). Those comprise reduction of fossil fuel generation in countries that are expected to import electricity from the Project (Central Asian countries) and avoided emissions from the domestic power system.

In addition, Rogun HPP will enable the expansion of exports of clean electricity to the broader region, which currently still largely depends on gas and coal-fired generation, and it would provide additional services (e.g., reserves and balancing) to the broader Central Asia Power System at competitive prices, thus enabling the maintenance of affordable electricity tariffs for consumers in the CA region and beyond. The project would contribute to a reduction in CO₂ emissions in the CA region through avoided emissions from fossil fuel generation in these countries.

Finally, it should be noted that Rogun HPP is already generating electricity and exports are expected to start as soon as Power Purchase Agreements (PPAs) are signed (term sheets for the PPAs have already been signed with Uzbekistan and Kazakhstan, and full PPAs expected to be signed in 2024) meaning the benefits described above would accrue from 2024 and steadily increase over time (rather than needing to wait 10-15 years).

Poverty/socio-economic development. The ESIA, SEP, and Gender Action Plan recognize that there are various vulnerable groups in the dam area who will require extra attention, especially during the resettlement process. We note your feedback on social impacts and will ask PMG to take this into consideration as they finalize the ESIA and ESMP.

The Government of Tajikistan is committed to leveraging Rogun HPP to support socio-economic development and alleviate poverty. In particular, it 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.

We are writing on behalf of Rivers without Boundaries, NGO Forum on ADB, CEE Bankwatch Network, Ecomaktab, Khorezm KIVA Center, UDASA, Nash Vek, Nukus Human Rights Initiative Group, International Socio-Ecological Union, International Rivers, Counter Current, Urgewald, Bank Information Center, Recourse, UWEC, Pakistan Fisherfolk Forum and Indus Consortium to follow up on earlier correspondence¹ expressing deep concern about approved and proposed financing for the Rogun Hydropower Project and associated facilities enabling its construction and viability. Although this letter explicitly pertains to the World Bank^{2 3 4} and AIIB^{5 6} given the project information disclosed publicly by both institutions, we address this letter to all 15 development finance institutions identified in project documents as the “Rogun Coordination Group”, as we understand all are potentially considering contributing loans, grants, or technical assistance to the Rogun HPP and/or its associated facilities.

Recently, from the World Bank’s [Concept Project Information Document](#)⁷ and AIIB’s Project Summary Information, we learned that the World Bank, AIIB as well as EIB each may commit at least USD 200 million to support the Rogun Hydropower Project. Yet this proposed allotment of public financial resources of USD 600 million is a mere fraction of the over USD 6 billion estimated as required to complete the project – not considering further cost overruns in the years ahead.

The development of the Rogun HPP Project on the Vakhsh River is of great concern due to its enormous associated social and environmental risks, not only to Tajikistan but to the region as a whole. It has been the trigger of major geopolitical tensions and has potential to harm transboundary water management in Afghanistan, Turkmenistan, and Uzbekistan, since its enormous active storage capacity has the potential to bring dramatic change to the downstream flow regime, not to mention potential damage in case of structural problems or operational failures.

¹ On 18 January 2024, an initial letter was sent calling for region-scale open public discussion from Rwb, CEE Bankwatch and NGO Forum on ADB. As we received no substantive response from the lead institutions supporting project preparation (“The Project Management Group”), now a wider group of concerned NGOs is taking this opportunity to once again write to your offices in order to bring your attention to our key concerns related to the project.

² P178819 - Technical Assistance for Financing Framework for Rogun Hydropower Project (2023) <https://projects.worldbank.org/en/projects-operations/project-detail/P178819> ;

³ P181029 - Sustainable Financing for Rogun Hydropower Project (2024) <https://projects.worldbank.org/en/projects-operations/project-detail/P181029>

⁴ [P145054](#), [P181219](#), [P167898](#) [Central Asia South Asia Electricity Transmission and Trade \(CASA-1000\) \(2014-2023\)](#)

⁵ Rogun Hydropower Development Project (project preparation grant 2023) <https://www.aiib.org/en/projects/details/2023/special-fund/Tajikistan-Rogun-Hydropower-Development-Project.html>

⁶ Obigarm-Nurobod road (project preparation 2019) <https://www.aiib.org/en/projects/details/2019/special-fund/Tajikistan-Obigarm-Nurobod-Road-Project.html>

⁷ <http://documents.worldbank.org/curated/en/099072123165041455/P1810290716f920e08543049a566c86b4c>

It is in this context that we urge you as responsible senior management staff of your respective institutions to reconsider any support your institution may be considering – at the very least, until full, comprehensive, participatory consultations in each riparian state are conducted (as per respective safeguard standards and the Aarhus Convention commitments), a robust ESIA is undertaken with a comprehensive updated evidence-based options assessment, and up-to-date, verifiable data, as well as a thorough assessment of the range of the economic, social, environmental, climate, seismic, and geopolitical risks associated with the project. Below we outline some of these key risks and concerns.

1. **Stakeholder Engagement:** For a project affecting the ecosystems and populations across at least four countries and leading to resettlement of 46,000 people, facing physical and economic displacement, with at least 10 million river-dependent people living downstream, robust and safe stakeholder engagement in the ESIA consultations is a key requirement. This is greatly complicated by strong pressure on civil society in Tajikistan and adjacent countries, making voicing any criticism a great personal risk for civil society members⁸. In this situation, we are greatly worried that no mandatory “Stakeholder Engagement Plan” (for consultations on disclosable environmental and social documents before the ESIA is finalized) has been disclosed. We would like to know how plans for stakeholder engagement will incorporate appropriate measures to ensure the safety of civil society members⁹ who participate in ESIA consultations and/or take action via grievance procedures, as to date, there is no such plan disclosed online or available in hardcopy of which we are aware. We are cognizant of the fact that on February 28, 2024 (two months after the initial ESIA disclosure by the World Bank) the Project Management Group posted a document in English titled “Stakeholder Engagement Plan (SEP)”¹⁰. However, this plan fails to adhere to required safeguard requirements of the World Bank Group and other potential financiers, instead suggesting that all public consultation events related to the ESIA have already taken place. Notably, it also contains incorrect information on mandatory disclosure.

2. **Incomplete ESIA:** The current draft ESIA documentation is neither complete nor satisfies the World Bank’s policy requirements. The Bank has already openly stated that it is unsatisfactory when on January 18 it published a terms of reference for the upgrade of the cumulative impact assessment¹¹. The disclosed part of the ESIA is extremely fragmented, full of unverifiable qualitative assessment judgements and not supported by sufficient and up to

⁸ <https://www.amnesty.org/en/location/europe-and-central-asia/tajikistan/report-tajikistan/>

⁹ <https://www.hrw.org/europe/central-asia/tajikistan>

¹⁰ <http://energyprojects.tj/index.php/en/rogun-hpp/eko-sots-instrument/1224-stakeholder-engagement-plan-1>

¹¹ <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099011824110541451/p1788191255c9f0d1a0471ef61753408b6> On January 25th the WB supplemented it with another “revised version” where pitfalls of the existing ESIA were no longer mentioned. <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099012524153061688/p17881918ee3270e1a837157b9b911b501> By February 18 the original January 18 TOR document, containing ESIA critique was removed. But still the Bank recognizes that cumulative assessment has to be redone.

date environmental and social data. Many key assessments and surveys on climate, hydrology, sedimentation, and biodiversity have not been completed yet at the time of the ESIA disclosure.

Despite the Bank's requirements, most of the environmental and social-related documents have not been disclosed yet, including Volume 2 of the ESIA (annexes with detailed assessments), the resettlement policy framework and resettlement action plan (RAP), biodiversity management plan, among others. All necessary documentation should be disclosed well in advance of the informed consultations in the respective languages of the affected riparian populations.

3. **Area of Impact:** The scope of the ESIA assessment is overly limited by merely considering the area of impacts (AOI) of the project as the territory of the Rogun reservoir and the downstream area from the Rogun HPP to the Nurek HPP dam. In effect, the entire downstream section of the Vakhsh River and the Amu Darya River is excluded from detailed consideration in the ESIA. However, it is the impacts on the water regime of the transboundary Amu Darya that have been causing significant international friction over the Rogun HPP project. The justification for such limited consideration is that "The flow regime of the Vakhsh River will be significantly altered only between the Rogun and Nurek HPPs". Yet, numerous paragraphs of the ESIA and previous reports from the World Bank show that the Lower Vakhsh's and Amu Darya's flows may alter significantly, leading to a heavy ecological and social toll.

To be credible, it is critical that the ESIA be extended to consider downstream impacts all the way to the Amu Darya Delta - its confluence with the Aral Sea – in terms of forecasting the flow regime at each downstream river stretch as well as its dependent components: freshwater biodiversity, ecosystem processes (services) of the river, river-related socio-economic activities (e.g. irrigation) and others.

4. **Inadequate Assessment of Flows:** We also insist that an accurate and trustworthy assessment of the possible impacts of the Rogun HPP requires an analysis of at least three main possible flow regulation regimes (operation patterns) mentioned in the ESIA: 1) contemporary, 2) maximizing energy and 3) "maximum water allocation for all users".¹²

Impacts should be studied for years with low, average and high flow and for different climate change scenarios possible in Central Asia in the next 100 years – the lifetime of the Rogun dam. Without such analyses, it is not possible to correctly assess all impacts of the Rogun reservoir on ecosystems and local communities located downstream from the Vakhsh hydropower cascade in Uzbekistan, Turkmenistan, Afghanistan and Tajikistan.

We are also convinced that the ESIA should consider the environmental and social impacts of all possible scenarios for filling the Rogun reservoir, including severe climate change

¹² ESIA Volume I 4.11.24 in English version.

scenarios, as there is reasonable doubt that sufficient water resources are available in the basin to fill the Rogun reservoir without undue harm to other countries, ecosystems and sectors of the economy. The assessment studies also must analyse the feasibility of implementation and necessity to improve the existing water-management agreements between the basin states in the light of those scenarios.

5. **Biodiversity Impacts:** The ESIA fully disregards potential impacts on the most important biodiversity features of the Amu Darya River basin, such as the [Tugay Forests of the Tigrovaya Balka Nature Reserve](#) World Heritage Site in the Vakhsh River floodplain, as well as two critically endangered species of shovelnose sturgeon inhabiting the Vakhsh and Amu Darya River (*Pseudoscaphirhynchus hermanni*¹³ and *Pseudoscaphirhynchus kaufmanni*¹⁴). It was flood control by the Nurek HPP that previously led to the deterioration of the Tigrovaya Balka ecosystems, and now it may be further exacerbated by the creation of the Rogun reservoir.

The Terms of Reference for the current World Bank project "Update Environmental and Social Instruments for the Rogun HPP Project" point (i) prescribes that the preparation of the Biodiversity Management Plan "will include working with Rogun and Tigrovaya Balka experts to assess the feasibility of having Rogun release water in a pattern and amount that at least partially mimics previously naturally occurring floods, which ended with the construction of Nurek HPP". However, the Draft ESIA materials do not contain the results of such an assessment on the feasibility of environmental flow releases. It is clear that the ESIA's proposed "current operation pattern of flow regulation by hydropower cascade" will continue to have a negative impact on the World Heritage Site.

In order to justify maintaining this regime, the ESIA must include a study of these impacts on the outstanding universal value of the UNESCO World Natural Heritage property, as well as a study of impacts under other alternative operation pattern regimes. An environmental flow regime sufficient for safeguarding and recovery of the Tigrovaya Balka ecosystems should be designed as a part of those assessment studies. Climate change projections should also be taken into account. Endangered fish species' needs should be studied and safeguarded as well. Potential impacts on other remaining tugay (floodplain forest) ecosystems in the nature reserves of Turkmenistan and Uzbekistan should also be assessed within the revised ESIA.

6. **Decarbonization Alternatives:** We consider the statement that "the Rogun HPP Project will significantly contribute to regional decarbonization in Central Asia" as inappropriate with no factual basis. The assumption appears to be that countries of the region will have to sign PPAs with Rogun Hydro and then wait for 10-15 years until Rogun HPP reservoir will be filled, satisfies domestic demand and starts delivering sizeable volume of "green energy". This is a very bad postponed scenario of decarbonization lagging with a very

¹³ <https://www.iucnredlist.org/species/18600/156719289>

¹⁴ <https://www.iucnredlist.org/species/18601/120872031>

questionable economics as development of Rogun will cost far beyond USD 3000/kw installed capacity – several times more than other imaginable alternatives. Alternative decarbonization scenarios based on the current situation must be assessed as a part of this ESIA completion. So far, the ESIA relies on 2014 studies, which are by now completely irrelevant.

7. **Cumulative Impacts Assessment:** We agree with the recent World Bank requirement to upgrade the substandard cumulative impacts assessment. We insist that the ESIA should include a comprehensive assessment of the cumulative impacts of all existing and planned water and energy projects in the Amu Darya basin on its ecosystem processes, biodiversity, habitat quality and socio-economic well-being. It is likely that some variant of a strategic environmental assessment, such as a regional environmental assessment, rather than a "rapid cumulative assessment" would be most suitable for this purpose. We strongly doubt that any new consultant (yet to be hired) can perform a valid assessment before the end of April 2024 and ask the World Bank not to force undue haste when it comes to most important questions that should be assessed.

8. **Resettlement and Grievance Plans:** We are shocked that no resettlement policy framework and RAP has been presented so far. We also do not see any assessment of environmental and social impacts resulting from massive resettlement since 2015 till now. We do not understand how any valid local ESIA consultations in Tajikistan could be held in the absence of those documents and the ESIA document being translated into the Tajik language. We assume that resettlement of 46,000 people presents the highest risk as it is happening in a country with a clear track record of corruption¹⁵, with a very problematic human rights record¹⁶ and on-going cases of repression against local protesters, media¹⁷ and human-rights activists¹⁸. We request disclosure of detailed resettlement documents and proof that there is a functional grievance mechanism in place which takes into account how to intake and address local grievances without putting requesters' safety and security at risk.

9. **Poverty/socio-economic development:** The project may further reduce the well-being of the relatively poor population. Stubborn overreliance on hydropower perpetuates winter blackouts due to water shortages and has been negatively affecting people of Tajikistan for decades. According to IMF, World Bank and OECD reports, so far, the Rogun HPP project has been the main impediment to the country's socio-economic development consuming 80% of state spending on infrastructure. Under pressure from international development finance institutions to institute fiscal austerity measures, the government is raising electricity tariffs. The ESIA fully omits those huge social impacts on poor and vulnerable

¹⁵ <https://www.transparency.org/en/cpi/2023/index/tjk>

¹⁶ <https://www.hrw.org/world-report/2024/country-chapters/tajikistan>

¹⁷ <https://rsf.org/en/country/tajikistan>

¹⁸ <https://www.hrw.org/world-report/2024/country-chapters/tajikistan#c3ba16>

populations that have been occurring in Tajikistan over the years while the initial stages of construction of the Rogun Hydropower Project have gotten underway.

The proposed financing scheme will perpetuate this till 2028 and beyond. The project completion price tag, which is well over USD 6 billion and can only be expected to further grow in the future, is much larger than anything Tajikistan can borrow sustainably. We can only conclude that the development finance consortium appears to have created the label of “Phase 1” for the current proposed loan disbursement period (despite the project being under construction since 1976) without being able to design any sustainable finance scheme to complete this HPP. We protest this highly risky unsustainable approach and request all development finance institutions involved to demonstrate a credible project completion scenario and assess its social impacts as a part of the ESIA.

Conclusion:

The ESIA is completely inappropriate in its limited scope, low quality and omission of the key potential impacts. The ESIA consultation process, and [riparian consultations](#) in particular¹⁹, cannot be considered meaningful as they were not based on appropriate stakeholder engagement plans and information disclosure so far has been insufficient to inform the stakeholders for proper participation in consultations.

We request that the ESIA be redone and in doing so, any new ToR for the new ESIA should be made subject to consultation with interested stakeholders and riparian countries.

We trust you will consider these concerns with urgency given the pending decisions on financing for the Rogun Hydropower Project at your respective institutions, and look forward accordingly to a prompt response.

Please, respond to us with information how you will address each of issues listed above to the following addresses: coalition@riverswithoutboundaries.org and dustin@urgewald.org

Sincerely,

1. Rivers without Boundaries, Kazakhstan
2. EKOMAKTAB Eco-Resource Center, Uzbekistan
3. Union for the Defense of the Aral Sea and Amu Darya UDASA, Nukus, Uzbekistan
4. Human Rights Initiative Group, Nukus, Uzbekistan
5. Khorezm KIVA Center for Agroinnovations, science, education and business, Uzbekistan
6. Nash Vek Public Foundation, Kyrgyzstan
7. NGO Forum on ADB, Regional
8. CEE Bankwatch Network, Regional
9. International Socio-Ecological Union

¹⁹ <http://www.energyprojects.tj/index.php/en/rogun-hpp/eko-sots-instrument/1215-esia-riparian-consultation-summary>

10. International Rivers
11. CounterCurrent, Germany
12. Urgewald, Germany
13. Bank Information Center, USA
14. Recourse, the Netherlands
15. UWEC Work Group, Regional
16. Pakistan Fisherfolk Forum
17. Indus Consortium, Pakistan