

TATIANA PROSKURYAKOVA  
Country Director  
Central Asia

December 13, 2024

Rogun Alert Coalition

Dear colleagues,

***Re: Rogun HPP Project Consultations in Tashkent and future consultations in absence of valid Environmental and Social Instruments and Intervention from Rwb for the record on November 14 Rogun Hydropower Project meeting***

Thank you for your continued engagement and feedback regarding the Rogun Hydropower Project (Rogun HPP). Your input is invaluable as we strive to ensure transparency, meaningful dialogue, and adherence to the highest environmental and social standards.

This letter responds to your letter to President Banga, dated November 8, 2024, concerning riparian consultations on the Rogun HPP held in Tashkent, Uzbekistan, on October 28, and your follow up email on November 26 regarding stakeholder consultations and the World Bank's meeting with international civil society organizations (CSOs) on November 14.

We appreciate your participation in the November 14 consultation meeting organized by the World Bank, which complements ongoing consultations led by the Government of Tajikistan held throughout the past year.

As shared during the meeting, we have launched a dedicated webpage for the Rogun HPP on the World Bank's website: <https://worldbank.org/rogun>. This page consolidates previous correspondence, including your letters and our responses exchanged throughout 2024, along with a list of frequently asked questions about the project. The page will be regularly updated to provide access to the latest information and project documents.

In addition, the Stakeholder Engagement Plan (SEP) available on the website outlines a detailed framework for continuous engagement with civil society organizations (CSOs) and stakeholders throughout project implementation. These consultations will include regular meetings, information sharing, and open feedback channels. The SEP is a living document that will be updated regularly to reflect engagement activities, as well as suggestions for improvements, such as those made recently by CSOs.

One of the key concerns you have raised is the timing of the Environmental and Social Impact Assessment (ESIA) and other environmental and social instruments. Once again, the World Bank acknowledges this concern and would like to clarify that final versions of these instruments will be disclosed prior to project effectiveness. While the updated ESIA, Environmental and Social Management Plan (ESMP), and Cumulative Assessment Plan (CIA) remain under preparation, the currently disclosed ESIA, dated December 2023, has been deemed sufficient to inform stakeholder engagement and Bank decision-making, in accordance with paragraph 51 of the World Bank's Environmental and Social Framework (ESF).

We would also like to request clarification regarding your mention of "omitted studies". At this time, we are not aware of any critical studies that have been excluded. To address this issue effectively, we request



that you specify which studies you believe are missing. It would also be helpful if you provide specific examples or evidence of claims you deem misleading to ensure that we can engage constructively and address your concerns.

Finally, we aim to provide a platform for transparent and constructive dialogue. In that regard, we have committed to regular quarterly meetings with CSOs throughout project implementation once the project is approved by our Board. If you have specific suggestions for improving the consultation process, we welcome your input.

Enclosed in the annex to this letter, you will find a detailed response matrix, which covers both letters.

Sincerely,

Tatiana Proskuryakova  
World Bank Country Director  
Central Asia

CC:

Axel van Trotsenburg, Senior Managing Director  
Anna Bjerde, Managing Director of Operations  
Antonella Bassani, Vice President, Europe and Central Asia  
Mamta Murthi, Vice President, People  
Juergen Voegelé, Vice President, Planet  
Pablo Saavedra, Vice President, Prosperity  
Guangzhe Chen, Vice President, Infrastructure  
Akihiko Nishio, Vice President, Development Finance  
Executive Directors-World Bank Board Members

**MATRIX OF RESPONSES TO 9<sup>TH</sup> LETTER FROM RIVERS WITHOUT BOUNDARIES ET AL, DATED NOVEMBER 8, 2024**

	<b>STATEMENT FROM ROGUN ALERT COALITION</b>	<b>RESPONSE</b>
1.	We are surprised that after 10 months of inaction, the World Bank and Rogun HPP PMG have all of a sudden announced a series of consultations with very little notice. We feel that those are not meaningful consultations conducted in a good faith, but rather a chaotic box-checking exercise designed to help pave the way for the imminent Board approval of the Rogun HPP in the absence of valid environmental and social instruments.	<p>While we acknowledge your concerns regarding the timing of the consultations, we would like to clarify that significant preparatory work has been ongoing for over a year. During this period and as communicated before, Rogun Project Management Group (PMG) and the Directorate of the Flooding Zone (DFZ) have been conducting consultations on the ESIA and RLRf as outlined in the Stakeholder Engagement Plan (SEP), available at <a href="http://energyprojects.tj">energyprojects.tj</a>. These efforts have included local consultations on resettlement, which are documented on DFZ's website (<a href="http://mmz.nbo-rogun.tj">mmz.nbo-rogun.tj</a>) as well as with regional stakeholders held in Almaty, Kazakhstan in November 2023, and Tashkent, Uzbekistan in October 2024.</p> <p>Following the disclosure of the environmental and social instruments in 2023 and 2024, the World Bank offered to moderate discussions in the riparian countries, commencing with Uzbekistan on October 28, 2024. We recognize that the notice could have been more extensive. PMG is aware and will ensure that future riparian consultations are announced as soon as they are confirmed.</p>
2.	We were also informed by Mme Proskuryakova that the Rogun HPP ESIA has expanded the Area of Influence (AOI) to include the downstream sections of the Vakhsh and Amu Darya rivers and assessments have been already performed. However, no new assessments reports on downstream impacts have been disclosed for comment.	<p>The December 2023 ESIA included a rapid CIA that evaluated the cumulative environmental and social impacts of the Rogun HPP within the project's Area of Influence. The geographical scope was deemed appropriate by the Environmental and Social Panel of Experts.</p> <p>Nonetheless, and in response to comments raised by the CSOs, an independent consultant was hired to carry out a more detailed CIA that covers the Vakhsh and Amu Darya rivers. The findings confirmed the rapid CIA and will be reflected in the final ESIA. The disclosure of the CIA and the final ESIA is a condition of effectiveness.</p>
3.	Several representatives of the Rogun Alert Coalition participated in the meeting organized by the World Bank and Rogun HPP Project on October 28 in Tashkent and	Extensive consultations with CSOs on various aspects of the Rogun HPP (i.e. Environmental and Social risks and ESF documents, riparian impacts, benefit sharing mechanisms) have been conducted regularly since 2008,

<p>concluded that those consultations fell short of any basic requirements for meaningful consultation, including those prescribed in the World Bank’s ESS 10.</p> <p>Consultations were announced only a week in advance without much effort to inform potentially affected communities in riparian countries.</p>	<p>with the frequency and scope of these consultations intensifying since 2022 as described below.</p> <p>Prior to disclosure of the most recent ESIA in December 2023, the main project implementing entity, the Rogun Project Management Group (PMG), held several consultations in 2022-2023 with national and international CSOs, where resettlement, livelihoods, cumulative impacts and labor conditions were among the issues discussed. Additional consultations on the ESIA and the Environmental and Social Management Plan were conducted in January 2024 in Dushanbe and affected communities.</p> <p>Three large consultations were held in Dushanbe and the resettlement areas in June 2024 to discuss the Resettlement and Livelihood Restoration Framework (RLRF). Comments were considered in finalizing the RLRF for disclosure.</p> <p>These consultations have been essential in understanding the needs of the project-affected people. These include replacement of suitable housing, structures, and lands; access to supportive social infrastructure; and longer-term efforts to restore livelihoods. The World Bank has been able to discuss these issues with affected groups without the government being present. Discussions have been informative and constructive, especially in identifying challenges in resettlement, compensation, and livelihood restoration. These consultations were supported by an international consultant and conducted in line with the World Bank’s guidance and are summarized in the Stakeholder Engagement Plan (SEP) disclosed in June 2024.</p> <p>The Rogun PMG has also held consultations with neighboring countries and civil society organizations in Almaty, Kazakhstan (November 2023), focusing on environmental, social and technical issues of concern to the riparian states. The World Bank facilitated consultations in Tashkent, Uzbekistan (October 2024) on riparian concerns. Consultations in other riparian states are planned.</p>
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		<p>More broadly, each Environmental and Social document has been disclosed prior to consultations, consulted upon, revised, and then re-disclosed. The PMG and the Directorate of the Flood Zone of the Rogun HPP (DFZ), the government entity charged with resettlement and livelihood restoration, also holds periodic meetings in affected communities to discuss key issues, particularly the dam’s environmental and social impacts. More details on DFZ’s resettlement work and the consultations can be found at DFZ’s website: mmz.nbo-rogun.tj.</p> <p>The consultation in Tashkent on October 28, 2024, facilitated a technical exchange involving more than 35 key stakeholders, including the Uzbek government, civil society organizations, and international NGOs, who could attend in person or connect online.</p>
4.	<p>No agenda was provided at the time of invitation, and when it arrived a day later the items it included were not accompanied by corresponding draft assessment studies, leaving participants without documents they could meaningfully comment on.</p>	<p>Consultations take time and resources to prepare. To avoid further delays in extending the invitation, we shared the agenda as soon as it was finalized.</p>
5.	<p>No comment period was indicated despite specific requests from CSOs to disclose for consultation key documents relevant to the topic of consultations. We were told that those reports are not ready yet and invited instead to comment on the “ESIA/ESMP which has been disclosed since last December” and the “updated Non-Technical Summary.”</p>	<p>Yes, key documents, including the updated ESIA/ESMP and CIA, are still under preparation. The ESIA/ESMP had been disclosed since December 2023, and other E&amp;S instruments were also disclosed between January and October 2024. As new documents, including the CIA, RAP 2, and LRP 2, become ready, they will be disclosed for consultation with specified comment periods.</p> <p>Rivers Without Boundaries and other CSOs have sent extensive comments to the World Bank about the ESIA/ESMP, RLRf and SEP in 9 letters. We have prepared detailed responses to 8 of them so far – and the current matrix addresses concerns expressed in the ninth letter.</p>
6.	<p>We were also made to believe that an updated assessment cannot be commissioned any time soon as it should be based on updated current information on climate change, hydrology, sedimentation processes, socio-economic situation and water use in riparian countries as well as analysis of changing policies, legislation and treaties. Some of these baseline studies were only recently commissioned</p>	<p>The update to the ESIA has already been commissioned and is in the works. The chapter on downstream water modeling is being finalized and will be disclosed as part of the conditions of effectiveness. Other studies, including on hydrology, climate change, seismology, and sedimentation are being undertaken and their results will be reflected in design updated during project implementation (as needed) under the guidance of the independent Dam Safety Panel of Experts (DSPOE). Notably, while recommending the additional studies, the DSPOE also indicated that project design and</p>

	<p>by the Rogun HPP project, while other studies were completely omitted.</p>	<p>construction program should not be impacted, therefore the results are not expected to materially impact the project's fundamental economics or viability.</p> <p>Additionally, an international expert on sedimentation will be hired, as recommended by the DSPOE, to update the reservoir sedimentation management techniques. While these updates are essential for long-term operational efficiency, they are not expected to alter the core design of the project, which is intended to offer a long-term sedimentation solution for the Vakhsh river.</p> <p>As for the socio-economic assessment, the ESIA and the Resettlement and Livelihood Restoration Framework both include summaries of the socio-economic baseline in the project area. The updated ESIA and RAP 2 will include additional analysis.</p> <p>Regarding analysis of policies, legislation and treaties – the ESIA covers the legal and administrative framework in Tajikistan pertinent to the project. To ensure a constructive dialogue, we kindly request that you specify which studies you believe are missing. This will enable us to address your concerns more effectively.</p>
7.	<p>All in all, the current ESIA is not based on up-to-date information and therefore cannot be treated as a credible assessment from which to draw conclusions and plan mitigation measures.</p>	<p>As communicated earlier, the World Bank considers the current ESIA sufficient to inform stakeholder engagement and decision-making, along with risk management and mitigation measures, consistent with paragraph 51 of the Environmental and Social Policy. The mitigation measures are identified in the ESCP, included in the Financing Agreement and supported by covenants.</p>
8.	<p>The presentations shown on October 28 did not fully correspond with the announced agenda, were selective in covering only favorable aspects, and contained contradictory statements. Although the agenda featured “findings of the ESIA” and “biodiversity management”, the first presentation titled “Introduction the Rogun Hydropower Project” did not present ESIA findings on impacts in any credible form. The presentation included only</p>	<p>We disagree. The October 28 meeting mostly discussed adverse impacts of the Rogun dam on Uzbekistan. These were raised in the presentation by PMG’s E&amp;S Advisor, and ample time was provided to discuss them.</p>

	one slide on negative impacts, while these would typically be the focus of any ESIA.	
9.	Speaking of absence of any alternatives to Rogun HPP, the presenter lamented “in future solar and wind could contribute, but now it is not advanced enough technology and too expensive” when, in fact, in 2023 the cost of solar PV installation was on average 4 times less expensive than for hydro, while 50% of newly capacity installed globally in 2023 was for solar and wind versus only 2% for hydropower.	<p>Although we covered the analysis of alternatives at the consultation meeting in Tashkent and on November 14<sup>th</sup>, we would like to reiterate that extensive regional modelling work carried out by the World Bank during the project appraisal demonstrated that the Rogun HPP stands out as the least-cost solution for providing clean and affordable baseload electricity to Central Asia.</p> <p>The initial assessment of alternatives was done in 2014.</p> <p>Currently, the project is already one third constructed. As indicated in the financing options study decommissioning and mitigation of risks to the Vakhsh cascade at this stage would involve substantial additional costs and substantive investments to replace the energy expected to be generated by the Rogun HPP, and result in significant foregone revenues from electricity exports, making non-completion a non-viable option at this stage. For a more detailed response, see our <a href="#">website</a>.</p>
10	<p>Dr. Zwahlen, who was supposed to present about cumulative impacts demonstrated deep disregard for on-going efforts and agreements presently implemented by governments and UN agencies to sustain what is left of the Southern Aral Sea–Amu Darya River delta, stating that measures implemented for saving Aral Sea “did not keep it from shrinking further” anyway. Based on that derogatory statement, he insisted that the fact that Rogun reservoir filling will decrease the volume of water delivered to the Aral by at least 25% is “insignificant” and does not require further impact assessment.</p> <p>He then suggested that a dedicated part of the 2014 ESIA on impacts on riparian countries was excluded from the 2023 ESIA documentation “because we already discussed that ten years ago”.</p>	<p>We regret any misunderstanding caused during the presentation. There was no intention to disregard ongoing efforts to sustain the Southern Aral Sea. Dr. Zwahlen presented data showing that the water releases downstream of the Nurek Dam, and consequently from the Rogun HPP, are not expected to significantly change the current situation in the Aral Sea. The assertion was that Rogun’s operation would neither exacerbate nor improve the existing conditions.</p> <p>The initial scope of the ESIA was focused on the section between Rogun and the downstream dam at Nurek, based on the assumption that downstream impacts beyond Nurek would be minimal. However, more recently and following the feedback received during consultations, the scope of the ESIA update (to be finalized prior to project effectiveness) has been expanded to include the downstream sections of the Vakhsh and Amu Darya rivers within the project’s area of influence. While important for</p>

		completeness purposes, this change is not expected to materially change the findings so far.
11	It was extremely disturbing to learn that this person single-handedly prepared the cumulative impact assessment (CIA), which will be the only section of the ESIA dealing with the assessment of downstream impacts. We were also concerned to learn that two drafts of the CIA report prepared by July and October have not been disclosed for public consultation.	Dr. Zwahlen is a qualified consultant who has been preparing initial drafts of the report on which PMG and the World Bank have provided technical comments. The CIA being prepared is sound and well supported, and will undergo a review process, including disclosure for public comment, as well as a review by the E&S and Dam Safety Panels of Experts
12	<p>The ESIA team largely failed to answer any substantive questions from the audience, including those on the mandatory World Heritage impact assessment, cumulative assessment for extreme circumstances (such as dam malfunction or failure), climate risk assessment, etc. Finally, when a local participant asked to describe the main findings of the ESIA, there was no answer at all. The project representatives repeatedly minimized the impacts of Rogun, yet were forced to concede that assessments supporting that claim are not ready yet.</p> <p>The experience of the consultations in Tashkent clearly showed that in the absence of good faith on the side of the World Bank and PMG and intentional non-disclosure of documents relevant to consultations, there is no room left for meaningful dialogue, nor for getting credible answers to questions asked by CSOs.</p>	As communicated earlier, the updated ESIA/ESMP, CIA, RAP 2 and LRP 2 will be disclosed for consultations as soon as they are ready, with clear deadlines for receiving comments. PMG and DFZ will review the feedback and ensure that stakeholders see which suggested changes have been made to the instruments as a result of the consultations/feedback; there will also be explanations for proposed changes that have not been accepted. The aim is to have robust instruments, which are also living documents that can be adjusted as the implementation situation changes.
13	We were further informed by World Bank staff that the updated ESIA/ESMP and the other environmental and social instruments will not likely be disclosed for consultation prior to the World Bank's expected Board meeting, and would only be disclosed after Board approval.	This is correct. See above.
14	We request that the ESIA Report (including Volume II which contains actual technical data on ESIA findings demonstrating its credibility), the Cumulative Impact Assessment, Biodiversity Management Plan, Resettlement Action Plan 2, and Emergency Response Plan for Vakhsh Cascade undergo consultations before the project financing	See above. PMG's E&S consultant is integrating technical data into the updated ESIA/ESMP. The Emergency Response Plan will also be disclosed as soon as it is ready.

	decision, and that they be disclosed for comment at least 2-4 weeks prior to consultation.	
15	<p>We are also surprised that the Stakeholder Engagement Plan (SEP) mainly consists of reports on stakeholder engagement that happened 10-15 years ago and contains little information on ESIA consultation after official disclosure of the draft report in December 2023. The SEP must contain a coherent plan for the sequence of pre-appraisal public consultations on essential assessment studies listed above. Instead, we heard vague promises of “several meetings to be held in riparian countries” without dates, names of countries, or a clear agenda. We are also surprised that at least 9 letters with substantive questions sent by CSOs to the World Bank in 2024 are omitted in the SEP and request that those be included with a matrix of responses in standard table format.</p>	<p>The SEP summarizes consultations on the ESIA/ESMP and RLRf after they were disclosed. Additional local consultations on the resettlement process are available at <a href="#">DFZ's website</a>.</p> <p>The comments to improve the SEP are appreciated. It is being updated and will include additional clarifications, drawing on suggestions raised by CSOs.</p> <p>The 9 letters were not addressed to the PMG or the Government of Tajikistan. Therefore, they cannot be included in the project SEP. The letters and responses are being posted on the World Bank's <a href="#">website</a>.</p>
16	<p>On November 4, we received from the World Bank an invitation to new international consultations with CSOs, hastily scheduled for November 14. While we welcome the World Bank's willingness to consult with us, we would like to point to multiple discrepancies with good practice and the World Bank's ESS 10:</p> <ol style="list-style-type: none"> <li>1. Announcement arrived only 10 days before the consultation date, which makes it difficult to fit in already busy schedules,</li> <li>2. Invitation is addressed to a dozen of international groups, thus ignoring other potentially interested stakeholders,</li> <li>3. As of November 5, there was no announcement even on the dedicated project website, which makes us doubt that any genuine effort is made to inform the public,</li> <li>4. Topic and arrangements for the consultations are vague, e.g. to “Address concerns on E&amp;S and technical issues in more detail”, “Further explore stakeholder engagement”, etc. If the plan was to give us oral answers to our previous letters, we insist on receiving these responses in writing,</li> </ol>	<p>The November 14, 2024, meeting is the first of quarterly discussions organized by the World Bank with international CSOs to discuss issues of concern regarding Rogun. Given the number of letters the international NGOs have written to the World Bank about the project, we believe it is a good idea to have regular conversations with NGOs/CSOs.</p> <p>We have already explained the situation with regard to the E&amp;S instruments under preparation and their eventual disclosure for consultation.</p>

	<p>5. No disclosed documents are listed as the subject of upcoming consultations. Again, as in the earlier meeting, the proposed consultation is not “based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful, and easily accessible information in a time frame that enables meaningful consultations” (ESS 10, para 22),</p> <p>6. No commenting period was indicated nor any information given on the reporting process by which outcomes of the consultation meetings and subsequent commenting will be summarized and incorporated in the ESIA report.</p>	
17	<p>We believe that further “in-depth exchange” that you asked for is impossible without the proper inclusion of interested stakeholders, advanced disclosure of essential assessment studies for comment, and setting a clear and equitable procedure that ensures that consultations are meaningful. We kindly ask you to reschedule consultations from November 14 to a time by which you can provide us with a coherent set of disclosed reports, reflecting new ESIA assessments, and which would form the subject of the consultations.</p>	<p>The meeting took place on November 14, 2024. Thank you for your participation and for the concerns and questions posed. We look forward to continuing our engagement.</p>

**MATRIX OF RESPONSES TO 10TH LETTER FROM RIVERS WITHOUT BOUNDARIES ET AL, DATED NOVEMBER 26<sup>TH</sup>**

<b>Issue Raised</b>	<b>World Bank Response</b>
<p>1. It was sad imitation of consultations held on November 14, where we were lectured that new ESF does not have any clear thresholds and rules to prevent destructive hydropower projects from being financed, no matter how poorly those are documented and consulted.</p>	<p>The Environmental and Social Framework (ESF) ensures that all financed projects meet rigorous environmental and social standards. While it does not establish universal thresholds, it requires robust assessments, mitigation measures, and stakeholder engagement tailored to each project's unique context. This framework has been and will continue to be applied to the Rogun HPP.</p>
<p>2. For over 10 months, civil society groups have consistently and repeatedly communicated with World Bank management on the flaws</p>	<p>Over the past 10 months, we have responded in detail to all the issues raised by civil society groups (see <a href="#">here</a>). Given the extensive efforts to</p>

Issue Raised	World Bank Response
<p>of the Rogun HPP Project, but no thorough responses to the critical issues put forward have been forthcoming from the World Bank management. In fact, the points raised remain entirely absent from the updated project Stakeholder Engagement Plan reports.</p>	<p>engage and maintain a meaningful dialogue, we respectfully ask for clarification on what additional information or actions you believe are required to address your expectations.</p> <p>As mentioned above, the SEP is coordinated by the Government of Tajikistan and therefore does not reflect correspondence addressed to the World Bank.</p>
<p>3. Responses we got are largely a mix of promises to produce missing assessments in future, and quotes from flawed ESIA and outdated feasibility studies.</p>	<p>Our responses have consistently been detailed, substantive, and grounded in the most up-to-date information available at the time.</p>
<p>4. As the year comes to a close, the World Bank and Rogun Hydropower Project Management Group was moving into a fast-tracked ‘consultation’ mode, announcing a series of meetings for civil society ‘stakeholder’ engagement.</p>	<p>This statement is not accurate. As communicated on multiple occasions, extensive consultations with CSOs have been conducted regularly since 2008. These consultations have continued steadily, and since 2022, their frequency and scope have increased to address evolving issues and stakeholder concerns. What may appear as an intensification of consultations is, in fact, the result of the World Bank and the PMG being responsive to CSO recommendations and concerns. We are making additional efforts to enhance transparency and inclusiveness—efforts that go beyond the standard requirements for such projects.</p> <p>Please note that prior to disclosure of the most recent ESIA in January 2024, PMG held several consultations in 2022-2023 with national and international CSOs. Additional consultations on the ESIA/ESMP were conducted in January 2024 in Dushanbe and affected communities. In June 2024, three large consultations were held in Dushanbe and the resettlement areas to discuss the RLRF. Comments were considered in finalizing the RLRF for disclosure.</p> <p>These consultations were supported by an international consultant and conducted in line with the World Bank’s guidance and are summarized in the <a href="#">Stakeholder Engagement Plan</a> (SEP) disclosed in June 2024.</p> <p>As you are aware, the Rogun PMG has also held consultations with neighboring countries and civil society organizations in Almaty, Kazakhstan (November 2023), focusing on environmental, social and technical issues of concern to the riparian states. The World Bank</p>

Issue Raised	World Bank Response
	<p>facilitated consultations in Tashkent, Uzbekistan (October 2024) on riparian concerns. Consultations in other riparian states are planned. More broadly, each Environmental and Social document has been disclosed prior to consultations, consulted upon, revised, and then re-disclosed. The PMG and the Directorate of the Flood Zone of the Rogun HPP (DFZ) also hold periodic meetings in affected communities to discuss key issues, particularly the dam’s environmental and social impacts. More details on DFZ’s resettlement work and the consultations can be found at DFZ’s website: <a href="http://mmz.nbo-rogun.tj">mmz.nbo-rogun.tj</a>.</p>
<p>5. This might have indicated a step in the right direction. However – 1. There is no clear indication of how outreach is being done to ensure invites are extended to groups in countries that stand to be affected by the development of the project</p>	<p>Outreach to potentially affected groups is conducted in coordination with the Government of Tajikistan and in line with the SEP.</p>
<p>5.2. There is no clarity on why such short notification is being provided</p>	<p>The invitation for the November 14 consultation meeting was sent two weeks in advance, a timeline we believe provided reasonable notice for stakeholders to plan their participation. We are taking steps to ensure that future consultations are scheduled and communicated with greater lead time to accommodate stakeholders’ schedules while balancing the logistical requirements of organizing effective consultations.</p>
<p>5.3. There are no new release of substantive project documents or clear commenting periods for those which exist.</p>	<p>See above items 5, 12 in Matrix 1</p>
<p>6. To give but one example, although it was announced that the Area of Project Influence has been extended and downstream impacts will be assessed in response to the urging of civil society groups, no new assessments reports on downstream impacts have been disclosed for comment. Then we were informed that this announcement was just a misleading public-relations move: to stand-alone assessment of downstream impacts was commissioned, but as promised 8 months ago some substitute will be included as a part of cumulative impact assessment done single-handedly by an arrogant gentleman with biased views on the project formed more than a decade ago.</p>	<p>Downstream impacts are being addressed as part of the updated ESIA and the CIA. These assessments are conducted by qualified experts and subject to rigorous review to ensure impartiality and accuracy.  Personal attacks on professionals involved in the project are unproductive and inappropriate.</p>

Issue Raised	World Bank Response
<p>7. So far observing the World Bank handling of consultations and its responses to letters written by CSOs, we have no option but to consider that these consultations as simply intended as a check-box exercise, with no serious attempt to address – concerns and questions being raised by civil society groups based both in region and beyond.</p> <p>Requests for disclosure of updated and complete project documents, including specific assessments (ESIA, CIA, Biodiversity Management Plan, etc.).</p>	<p>See above item 4</p>
<p>The ESIA is based on outdated information, does not analyze how to mitigate the key risks and cannot be the basis for any decisions to finance the project.</p> <p>As a consequence, prior to further engagement, we request the disclosure at a minimum up to date project documents, free of redacted content, including:</p> <ul style="list-style-type: none"> <li>a. the full ESIA Report (all volumes, inclusive of technical data), including dedicated chapter with in-depth assessment of downstream impacts on riparian countries and up-to-date chapter on analysis of alternatives,</li> <li>b. Heritage impact assessment in line with UNESCO requirements for Tigrovaya Balka World Heritage property downstream of Vakhsh Cascade.</li> <li>c. the Cumulative Impact Assessment,</li> <li>d. the Biodiversity Management Plan with feasibility study for environmental flows downstream of Vakhsh cascade,</li> <li>e. the Resettlement Action Plan 2,</li> <li>f. Emergency Response Plan for Vakhsh Cascade, including assessment of potential impacts in case of dam breach or malfunction, and</li> <li>g. Environmental and Social Commitment Plan includes specific enforceable measures to avoid\mitigate potential impacts, including designing and sustaining environmental flows downstream of the Vakhsh hydropower cascade reoperated by Rogun Reservoir.</li> </ul> <p>In our understanding hose assessments MUST undergo consultations before the project financing decision.</p>	<p>See above items 5, 12 in Matrix 1.</p>

<b>Issue Raised</b>	<b>World Bank Response</b>
8. Comments on the Environmental and Social Commitment Plan (ESCP).	We welcome your comments on the ESCP and are committed to reviewing them thoroughly. If you have specific timelines or expectations for the submission of your feedback, please inform us so we can accommodate accordingly.



*November 08, 2024*

TO: Ajay Banga, President, World Bank Group

CC: Axel van Trotsenburg, Senior Managing Director  
Anna Bjerde, Managing Director of Operations  
Antonella Bassani, Vice President, Europe and Central Asia  
Mamta Murthi, Vice President, People  
Juergen Voegelé, Vice President, Planet  
Pablo Saavedra, Vice President, Prosperity  
Guangzhe Chen, Vice President, Infrastructure  
Akihiko Nishio, Vice President, Development Finance  
Tatiana Proskuryakova Regional Director Central Asia  
Executive Directors-World Bank Board Members

**Re: Rogun HPP Project Consultations in Tashkent and future consultations in absence of valid Environmental and Social Instruments**

Dear President Banga:

We are surprised that after 10 months of inaction, the World Bank and Rogun HPP PMG have all of a sudden announced a series of consultations with very little notice. We feel that those are not meaningful consultations conducted in a good faith, but rather a chaotic box-checking exercise designed to help pave the way for the imminent Board approval of the Rogun HPP in the absence of valid environmental and social instruments.

We were also informed by Mme Proskuryakova that the Rogun HPP ESIA has expanded the Area of Influence (AOI) to include the downstream sections of the Vakhsh and Amu Darya rivers and assessments have been already performed. However, no new assessments reports on downstream impacts have been disclosed for comment.

Several representatives of the Rogun Alert Coalition participated in the meeting organized by the World Bank and Rogun HPP Project on October 28 in Tashkent and concluded that those consultations fell short of any basic requirements for meaningful consultation, including those prescribed in the World Bank's ESS 10.

Consultations were announced only a week in advance without much effort to inform potentially affected communities in riparian countries.

No agenda was provided at the time of invitation, and when it arrived a day later the items it included were not accompanied by corresponding draft assessment studies, leaving participants without documents they could meaningfully comment on.

No comment period was indicated despite specific requests from CSOs to disclose for consultation key documents relevant to the topic of consultations. We were told that those reports are not ready yet and invited instead to comment on the "ESIA/ESMP which has been disclosed since last December" and the "updated Non-Technical Summary.

The meeting was not supported by any disclosed assessment of impacts on riparian countries, and no up to date assessment of downstream impacts in riparian countries were included in the 2023 ESIA materials. Meanwhile, the previous 2014 ESIA included an extensive chapter solely dedicated to impacts on riparian countries downstream of Vakhsh hydropower cascade.

We were also made to believe that an updated assessment cannot be commissioned any time soon as it should be based on updated current information on climate change, hydrology, sedimentation processes, socio-economic situation and water use in riparian countries as well as analysis of changing policies, legislation and treaties. Some of these baseline studies were only recently commissioned by the Rogun HPP project, while other studies were completely omitted. All in all, the current ESIA is not based on up-to-date information and therefore cannot be treated as a credible assessment from which to draw conclusions and plan mitigation measures.

The presentations shown on October 28 did not fully correspond with the announced agenda, were selective in covering only favorable aspects, and contained contradictory statements. Although the agenda featured "findings of the ESIA" and "biodiversity management", the first presentation titled "Introduction the Rogun Hydropower Project" did not present ESIA findings on impacts in any credible form. The presentation included only one slide on negative impacts, while these would typically be the focus of any ESIA. Speaking of absence of any alternatives to Rogun HPP, the presenter lamented "*in future solar and wind could contribute, but now it is not advanced enough technology and too expensive*" when, in fact, in 2023 the cost of solar PV installation was on average 4 times less expensive than for hydro, while 50% of newly capacity installed globally in 2023 was for solar and wind versus only 2% for hydropower.

Dr. Zwahlen, who was supposed to present about cumulative impacts demonstrated deep disregard for on-going efforts and agreements presently implemented by governments and UN agencies to sustain what is left of the Southern Aral Sea– Amu Darya River delta, stating that measures implemented for saving Aral Sea "did not keep it from shrinking further" anyway. Based on that derogatory statement, he insisted that the fact that Rogun reservoir filling will decrease the volume of water delivered to the Aral by at least 25% is "insignificant" and does not require further impact assessment. He then suggested that a dedicated part of the 2014 ESIA on impacts on riparian countries was excluded from the 2023 ESIA documentation "because we already discussed that ten years ago". It was

extremely disturbing to learn that this person single-handedly prepared the cumulative impact assessment (CIA), which will be the only section of the ESIA dealing with the assessment of downstream impacts. We were also concerned to learn that two drafts of the CIA report prepared by July and October have not been disclosed for public consultation.

The ESIA team largely failed to answer any substantive questions from the audience, including those on the mandatory World Heritage impact assessment, cumulative assessment for extreme circumstances (such as dam malfunction or failure), climate risk assessment, etc. Finally, when a local participant asked to describe the main findings of the ESIA, there was no answer at all. The project representatives repeatedly minimized the impacts of Rogun, yet were forced to concede that assessments supporting that claim are not ready yet.

The experience of the consultations in Tashkent clearly showed that in the absence of good faith on the side of the World Bank and PMG and intentional non-disclosure of documents relevant to consultations, there is no room left for meaningful dialogue, nor for getting credible answers to questions asked by CSOs.

We were further informed by World Bank staff that the updated ESIA/ESMP and the other environmental and social instruments will not likely be disclosed for consultation prior to the World Bank's expected Board meeting, and would only be disclosed after Board approval.

We request that the ESIA Report (including Volume II which contains actual technical data on ESIA findings demonstrating its credibility), the Cumulative Impact Assessment, Biodiversity Management Plan, Resettlement Action Plan 2, and Emergency Response Plan for Vakhsh Cascade undergo consultations before the project financing decision, and that they be disclosed for comment at least 2-4 weeks prior to consultation.

We are also surprised that the Stakeholder Engagement Plan (SEP) mainly consists of reports on stakeholder engagement that happened 10-15 years ago and contains little information on ESIA consultation after official disclosure of the draft report in December 2023. The SEP must contain a coherent plan for the sequence of pre-appraisal public consultations on essential assessment studies listed above. Instead, we heard vague promises of "several meetings to be held in riparian countries" without dates, names of countries, or a clear agenda. We are also surprised that at least 9 letters with substantive questions sent by CSOs to the World Bank in 2024 are omitted in the SEP and request that those be included with a matrix of responses in standard table format.

On November 4, we received from the World Bank an invitation to new international consultations with CSOs, hastily scheduled for November 14. While we welcome the World Bank's willingness to consult with us, we would like to point to multiple discrepancies with good practice and the World Bank's ESS 10:

1. Announcement arrived only 10 days before the consultation date, which makes it difficult to fit in already busy schedules,
2. Invitation is addressed to a dozen of international groups, thus ignoring other potentially interested stakeholders,
3. As of November 5, there was no announcement even on the dedicated project website, which makes us doubt that any genuine effort is made to inform the public,
4. Topic and arrangements for the consultations are vague, e.g. to "Address concerns on E&S and technical issues in more detail", "Further explore stakeholder engagement", etc. If the plan was to give us oral answers to our previous letters, we insist on receiving these responses in writing,
5. No disclosed documents are listed as the subject of upcoming consultations. Again, as in the earlier meeting, the proposed consultation is not "*based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful, and easily accessible information in a time frame that enables meaningful consultations*" (ESS 10, para 22),
6. No commenting period was indicated nor any information given on the reporting process by which outcomes of the consultation meetings and subsequent commenting will be summarized and incorporated in the ESIA report.

We believe that further "in-depth exchange" that you asked for is impossible without the proper inclusion of interested stakeholders, advanced disclosure of essential assessment studies for comment, and setting a clear and equitable procedure that ensures that consultations are meaningful.

We kindly ask you to reschedule consultations from November 14 to a time by which you can provide us with a coherent set of disclosed reports, reflecting new ESIA assessments, and which would form the subject of the consultations.

Sincerely,

Rivers without Boundaries

CounterCurrent

International Rivers

Socio-ecological union international

World Heritage Watch

Dear World Bank team:

It was sad imitation of consultations held on November 14, where we were lectured that new ESF does not have any clear thresholds and rules to prevent destructive hydropower projects from being financed, no matter how poorly those are documented and consulted.

This text largely reflects my short intervention at the meeting and I kindly ask You to include it in the meeting report unchanged.

For over 10 months, civil society groups have consistently and repeatedly communicated with World Bank management on the flaws of the Rogun HPP Project, but no thorough responses to the critical issues put forward have been forthcoming from the World Bank management. In fact, the points raised remain entirely absent from the updated project Stakeholder Engagement Plan reports. Responses we got are largely a mix of promises to produce missing assessments in future, and quotes from flawed ESIA and outdated feasibility studies.

As the year comes to a close, the World Bank and Rogun Hydropower Project Management Group was moving into a fast-tracked 'consultation' mode, announcing a series of meetings for civil society 'stakeholder' engagement.

This might have indicated a step in the right direction. However –

1. There is no clear indication of how outreach is being done to ensure invites are extended to groups in countries that stand to be affected by the development of the project
2. There is no clarity on why such short notification is being provided
3. There are no new release of substantive project documents or clear commenting periods for those which exist.

To give but one example, although it was announced that the Area of Project Influence has been extended and downstream impacts will be assessed in response to the urging of civil society groups, no new assessments reports on downstream impacts have been disclosed for comment. Then we were informed that this announcement was just a misleading public-relations move: to stand-alone assessment of downstream impacts was commissioned, but as promised 8 months ago some substitute will be included as a part of cumulative impact assessment done single-handedly by an arrogant gentleman with biased views on the project formed more than a decade ago.

So far observing the World Bank handling of consultations and its responses to letters written by CSOs, we have no option but to consider that these consultations as simply intended as a check-box exercise, with no serious attempt to address – concerns and questions being raised by civil society groups based both in region and beyond.

The ESIA is based on outdated information, does not analyze how to mitigate the key risks and cannot be the basis for any decisions to finance the project.

As a consequence, prior to further engagement, we request the disclosure at a minimum up to date project documents, free of redacted content, including:

- a. the full ESIA Report (all volumes, inclusive of technical data), including dedicated chapter with in-depth assessment of downstream impacts on riparian countries and up-to-date chapter on analysis of alternatives,
- b. Heritage impact assessment in line with UNESCO requirements for Tigrovaya Balka World Heritage property downstream of Vakhsh Cascade.
- c. the Cumulative Impact Assessment,
- d. the Biodiversity Management Plan with feasibility study for environmental flows downstream of Vakhsh cascade,
- e. the Resettlement Action Plan 2,
- f. Emergency Response Plan for Vakhsh Cascade, including assessment of potential impacts in case of dam breach or malfunction, and
- g. Environmental and Social Commitment Plan includes specific enforceable measures to avoid\mitigate potential impacts, including designing and sustaining environmental flows downstream of the Vakhsh hydropower cascade reoperated by Rogun Reservoir.

In our understanding these assessments MUST undergo consultations before the project financing decision.

And thank You, Mr. Cormier, for inviting us to submit comments on the empty and misguided Environmental and Social Commitments Plan. We are working on those and you will get them in a due course. If You have commenting deadline – please inform us.

Sincerely,

Eugene Simonov

Coordinator

Rivers without Boundaries International Coalition