



ШЕКАРАСЫЗ  
ӨЗЕНДЕР

«Шекарасыз өзендер» Когамдық қоры  
Rivers without Boundaries Public Fund

БИН 230440031982

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RIVERS WITHOUT  
BOUNDARIES

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Date: January 18, 2024

TO:

Ajay Banga  
World Bank President

Antonella Bassani  
World Bank Vice President, Europe and Central Asia

Tatiana Proskuryakova  
World Bank Regional Director for Central Asia

CC:

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

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

We are writing on behalf of the Rivers without Boundaries International Coalition, NGO Forum on ADB, CEE Bankwatch Network to bring to your attention specific concerns about the World Bank's<sup>1 2 3</sup> and AIIB's<sup>4 5 6</sup> recent support for the Rogun Hydropower Project and projects enabling its construction and viability. We request that wide regional public consultations be held for the Rogun Project ESIA and the World Bank and other members of the Rogun Coordination Group<sup>7</sup> show greater openness and stand up to their ESG standards and public participation policies.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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<sup>9</sup> <http://documents.worldbank.org/curated/en/099122223091529585/P1810291b43c970a71993e1a8e76ceb151c>

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

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

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

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



Sincerely

Alexander Kolotov,

Director of **Rivers without Boundaries Public Fund**

Endorsed by:

**NGO Forum on Asian Development Bank**

**CEE Bankwatch Network**