

COMMENTS ON CUMULATIVE IMPACTS OF THE KAMBARATA-1 HYDROPOWER PROJECT AS REFLECTED IN THE 2025 ESIA.

Rivers without Boundaries

December 4, 2025

1. Executive Summary

The Cumulative Impact Assessment (CIA) is a brief, well-meaning document, deprived of in-depth analysis of impacts and detailed planning of mitigation measures. Its valid, but very general recommendations are not supported by the rest of ESIA, including environmental management plans. As a result, key cumulative impacts of the Kambarata-1 HPP Project (KB-1) remain unmitigated.

The review identifies that while the ESIA for KB-1 acknowledges significant transboundary and cumulative risks, the specific management plans (P9 and P10) currently focus heavily on site-specific mitigation within the immediate project footprint. Significant gaps exist regarding the operationalization of transboundary ecological flows, achieving “No Net Loss” for natural habitat, the management of invasive species, and the long-term viability of fish conservation strategies. Recommendations are provided to bring these plans into full compliance with World Bank Environmental and Social Standard 6 (ESS6): *Biodiversity Conservation and Sustainable Management of Living Natural Resources*.

While the Biodiversity Management Plan (Book 4.1) provides questionable measures for site-specific construction impacts (e.g., flora translocation), it does not fully address the systemic and cumulative risks identified in the CIA (Book 2.4).

To achieve alignment with World Bank ESS6, the project must shift from a siloed "site impact" approach to a "basin-wide" management approach. This requires development of a biodiversity preservation plan for downstream wetlands, banning any non-native aquaculture, ensuring "No Net Loss" of aquatic habitat by permanently protecting natural river habitat from future cumulative development, etc.

Addressing these gaps is essential to substantiate the claim of "No Net Loss" and to manage the high-risk profile of this infrastructure project.

2. INTRODUCTION

This report presents an analysis of the consistency between the conclusions derived from the Cumulative Impact Assessment (CIA) presented in Chapter 13 of the ESIA (Volume II, Book 2.4), Chapter 10 of the ESIA (Impacts), Environmental Flow Assessment and the specific management plans—Sub-Plan 9 (Environmental Flow Management Plan) and Sub-Plan 10 (Biodiversity Management Plan)—presented in Volume IV, Book 4.1.

Since its inception several decades ago, the main concern related to the KB-1 Project has been its possible cumulative impact on the aquatic ecosystems and irrigation systems below the Naryn Hydropower Cascade. Uncoordinated operations of a giant Toktogul Reservoir alone after it switched to energy-generation regime, in winters often resulted in massive outflow of water during winter season. This had negative consequences for aquatic ecosystems and necessitated rerouting water into Arnasay Lakes in Uzbekistan, and, later, construction of a new Kok-Sarai reservoir in Kazakhstan,

because Lower Syr Darya river freezes in winter and cannot deliver abundant winter flows into Lesser Aral Sea. Such flow redistribution also created difficulties for irrigation in downstream countries, as ¹less water became available in summer. Therefore, the environmental flow regime downstream of Toktogul is the key question of the CIA and ESIA as a whole.

Another, more recent concern is associated with the intensive hydropower development throughout Kyrgyzstan, partly triggered by cryptocurrency mining opportunities and justified by electricity shortages. Government - approved plans for the free-flowing along 600 kilometers Naryn river and its tributaries include more than 35 large and medium-sized hydropower stations, one of which, 100 MW Kulanak HPP, is under construction. Cumulative impact from the KB-1 and other projects planned/built in the basin may lead to radical modification of sizable free-flowing river ecosystems in the Naryn River basin and massive loss of natural aquatic habitats and its native fauna.

The third concern is about decreasing possibility for conducting meaningful public consultations, reaching transboundary agreement on conservation of globally important biodiversity and genuine long-term implementation of the agreed environmental mitigation measures by Kyrgyz Government. On one hand, energy development (primarily hydropower) in Kyrgyzstan has been named “national emergency” and most decision-making procedures are not constrained by any public accountability mechanisms, social and environmental safeguards. Many high-level officials [are believed to own](#) or control hydropower plants, many of which are believed to be used for cryptocurrency mining (including the Kambarata-2 run-of-river project).

On the other hand, during the last two years the top officials of the country run a campaign to annihilate any civil society discontent. Independent media were banned, journalists and activists accused of “stirring turmoil”, citizens were arrested for criticizing corruption and authoritarian trends.

The Kyrgyz Government has a poor recent record of adhering to its word when it comes to international treaties. For example, in July 2025 the Government reported to the World Heritage Committee about *“actions already taken by the State Party of Kyrgyzstan to halt two geological exploration licenses that had been granted for the area within the Besh-Aral”* Component of the Western Tien-Shan World Heritage². Despite that information, the rampant placer gold mining continued at least till late October 2025 and destroyed an additional stretch of the Chatkal river of more than one kilometer in length.

Finally, Kyrgyzstan several years ago quit several regional environmental programs, for example, denounced its participation in Syr Darya BVO (basin management mechanism coordinating use of reservoirs and water withdrawals) and is no longer bound by most important transboundary water management and information exchange procedures.

Given all factors above, any ESIA/mitigation plan suggested for KB-1 must contain robust up-to-date baseline data and detailed action planning, include safe mechanisms for public participation, be based on new binding agreements with financiers and riparian countries which guarantee long-term implementation of measures. At each stage of the Project consideration, a judgment must be made whether in given political circumstances it can be guaranteed that the borrower will implement mitigation measures. One of most reliable tools that financiers have at hand – not

¹ Computing Bitcoin on Soviet Legacies . Material Geopolitics of Cryptocurrency Mining in Global East <https://doi.org/10.4000/14adh>

² Decision 47 COM 7B.8 <https://whc.unesco.org/en/decisions/8732>

approving\financing the project until those mitigation measures are implemented\guaranteed by binding legal agreements.

3. Analysis of Environmental Flow Management (transboundary impacts)

3.1 CIA (Book 2.4, Chapter 13) is a very short superficial document, which does not present results of any baseline study, no in-depth analysis of impacts and has no detail on proposed mitigation plans. It fully avoids analyzing major problems with seasonal flow redistribution in the past. Meanwhile, all other relevant parts of the ESIA avoid discussing impacts on downstream cascades, providing an excuse that detailed data/analysis on the subject is presented in the CIA. As a result, there is a serious gap in mitigation of the cumulative impacts due to lack of baseline information on current situation below cascade and absence of modelling results which show how KB-1 and Toktogul HPPs together could increase seasonal redistribution of downstream flows. Only scenarios of alleviating the downstream impacts of Toktogul are demonstrated (CIA 13-14-15 Water Availability).

3.2. The CIA establishes that the Kambarata-1 (K-1) project will fundamentally alter the hydrological regime of the Naryn River . The project enables a shift from summer releases (natural flow) to winter releases (power generation), potentially impacting downstream irrigation and ecology. The key Valued Environmental Component (VEC) is the availability and seasonal distribution of water at the Kyrgyz–Uzbek border(13.4.15.2). While the document correctly identifies the problem

3.3. KB-1 operation must be coordinated with Toktogul and Kambarata-2 to mitigate downstream impacts. The CIA notes that “flow availability in the downstream region will be determined by the integrated operational regime of the entire cascade”* (CIA Section 13.4.15). *“The significance of potential cumulative impacts has been considered for flora, fauna, vegetation and habitat and Ramsar wetlands. The significance of impacts should be considered together with confirmed mitigation measures that will be adopted for the project.(13.4.19)”*. The Environmental Flow Impact Assessment (EFIA) is described in CIA as "provisional," requiring finalization based on detailed operational specifications (Section 13.5.1).

3.4. The CIA also identifies downstream Ramsar wetlands (e.g., Northern Aral Sea, Aydar-Arnasay,etc.) as Valued Ecosystem Components (VECs) sensitive to seasonal flow changes. Instead of providing current baseline data, the CIA refers only to outdated information sheets on Ramsar Convention’s website. As a result it fails to reveal that different wetlands have very different dependence on seasonal flows downstream of Naryn Hydropower Cascade (e.g. Aydar-Arnasay Ramsar site historically was formed and sustained due to increased winter flows, while other wetlands, likely, depend on availability of summer flows.)

3.5. The ESIA is Lacking Binding Ecological Targets for Mitigating Cumulative Impacts. The CIA states that beneficial cumulative impacts depend on "coordinated multi-reservoir operations." However, P9 currently lacks specific ecological thresholds (e.g., minimum summer flows for wetland sustenance) required to operationalize this coordination. Description of downstream impacts also misses specific VECs such as endangered species of fish (e.g. Pike Asp, Aral Barbel, and Syr Darya Shovelnose Sturgeon).

3.6. The CIA admits the EFIA is provisional. ESS6 requires adaptive management, but the current plan lacks a defined mechanism to adjust flow regimes if downstream biodiversity monitoring indicates degradation.

3.7. The CIA clearly articulates *“Devising an operating regime for the Project and Toktogul Reservoir that will address summer water requirements of downstream environs would be a key mitigation measure to maintain biodiversity values in Ramsar Wetlands, as well as ecosystem function across the whole CIA boundary. **If no additional water is released during summer, the project, in conjunction with other HPPs and stressors such as climate is likely to result in a negative cumulative impact on biodiversity values**”*. However, it frames mitigation of downstream impacts as not urgent: *“Future operational strategies should therefore consider integrated environmental flow planning and seasonal flow adjustment mechanisms across the cascade.”* (CIA 13-14-15 Water Availability).

3.2. Chapter 10. Impacts.

3.2.1. Chapter 10 clearly identifies the cause of impacts: *“... This cascading regulation marks a basin-significant transformation of the natural river regime. It converts an historically snowmelt-dominated and seasonally dynamic river system into a series of impounded reaches with managed releases. These changes have important implications for downstream water availability, ecosystem function, and transboundary water governance, which are addressed in the cumulative impact assessment and basin-wide management recommendations.”* (10.4.1.11.2 Hydrology). *“Changes in flow patterns and water surface elevations upstream and downstream of the dam would result in a shift in the hydrological regime of the associated catchment with respect to the baseline conditions”* (Book 2.3 Summary of significant impacts 10.6).

However, it does not refer to any mitigation plan to confront the impacts.

3.3. Biodiversity management plan (BMP)

3.3.1. The BMP has a dedicated section: *“ the Cumulative Impact Assessment (CIA) identified a range of biodiversity-relevant risks associated with the operation of Kambarata-1 HPP in combination with other cascade dams, particularly Toktogul. These are distinct from site-level impacts and relate to hydrological regime change, ecological flow requirements, and transboundary effects.”* (6.3 Cumulative Impacts).

Table 67 lists such transboundary impacts:

Transboundary Impacts (Uzbekistan and Kazakhstan)	
Migratory Fish & Aquatic Biodiversity	Altered downstream flows may affect habitat quality and recruitment; potential reduction in aquatic productivity.
Downstream Wetland-Associated Birds	Potential disturbance of corridors and prey base through reduced fish abundance and wetland quality. Migratory birds may experience loss of habitat and food resources through a change in seasonal flows to downstream wetlands.
Floodplain / Wetland Ecosystems	Flow regulation may affect Ramsar-type wetlands and agriculture-linked ecosystems.
Sediment Context (for fish habitat)	No incremental change from Kambarata-1: Toktogul already traps nearly all upstream sediment, so downstream Uzbekistan/Kazakhstan will not experience further sediment reduction due to K-1.
General CH & ESS6 obligations	Potential for non-compliance with ESS6/18 & 24 if transboundary critical habitats are affected without mitigation.

However, the rest of the BMP does not include any measures to mitigate those impacts. The rest of BMP is strictly confined to the "Study Area" (KB-1 reservoir and immediate surroundings). It fails to address the CIA's concern regarding the degradation of downstream Ramsar site biodiversity due to flow alteration.

3.3.2. Transboundary and cumulative impacts on key endangered species omitted. Despite listing the Pike Asp, Aral Barbel, and Syr Darya Shovelnose Sturgeon as species of concern, probably, inhabiting

the areas of planned KB-1 reservoir, the biodiversity assessment and BMP fail to recognize that presence and impacts on these species is even more likely in less mountainous watercourses downstream of Naryn Cascade.

3.3.3. No baseline study has been conducted in potentially affected areas downstream of Naryn hydropower cascade, data presented in the CIA are old and insufficient. There are no monitoring actions for biodiversity planned downstream of the Naryn hydropower cascade either in the BMP or in the CIA. In absence of planned surveys, it is unclear how up-to-date information necessary to mitigate impacts there could be obtained.

3.4. Environmental Flow Impact Assessment (EFIA) and Management Plan (EFMP)

3.4.1. The current mitigation strategy focuses on maintaining steady water levels in the Kambarata-2 reservoir during construction and filling to prevent bank erosion and habitat disruption (Section 11.1.7). It establishes the need for real-time monitoring of discharge rates. *“Unlike most environmental flow plans, this EFMP is not designed to maintain downstream instream flows in a free-flowing river”* (sic!).

3.4.2. Both EFIA and EFMP relegate environmental flow management below the cascade to the CIA, but as we already know the CIA is not equipped with any valid mitigation plan. *“While this EFMP focuses on operational flow management within the hydraulically impounded reach, it is informed by the broader basin-scale analysis presented in the Cumulative Impact Assessment (CIA). The CIA identifies transboundary water availability risks and recommends the development of a Joint Impoundment Planning Framework to coordinate reservoir filling across the Naryn Basin. Although such planning mechanisms fall outside the scope of this EFMP, their relevance to non-routine flow scenarios, particularly initial impoundment, is acknowledged and supported through the mitigation measures outlined herein”* (p.222).

3.5. Recommendations for Compliance with WB ESS6, WBG Guidance on Environmental Flows, and IFC’s Guidance on the CIA (transboundary impacts)

The current ESIA’s framework for environmental flows appears to focus on construction-phase flows between K-1 and K-2. It fails to adequately address the operational requirement identified in the CIA to support downstream ecosystem functions (e.g. at Ramsar sites) and other important biodiversity features in the wider Syr Darya basin.

3.5.1. Expand P9 Scope. Sub-Plan 9 (EFMP) must be expanded from a site-specific plan to a cascade-integrated environmental flow framework. It must explicitly link K-1 releases to Toktogul operations to ensure downstream ecological requirements (and those of irrigation) are met.

3.5.2. Define Ecological Indicators. In accordance with ESS6 (maintaining primary ecological functions), P9 must establish specific hydrological indicators (seasonality, pulse flows) necessary to sustain aquatic flora and fauna and the downstream Ramsar wetlands identified in the CIA. Ramsar wetlands most likely qualify as critical habitats, which should be reflected in the ESIA.

3.5.3. Transboundary Monitoring Mechanism. Establish a joint monitoring protocol within P9 that includes data sharing with downstream riparian states regarding water quality and quantity, specifically triggered by low-flow seasons.

3.5.4. Cooperative development of the Transboundary Environmental Flow Program and Monitoring Mechanisms should be included into the Environmental and Social Commitment Plan (ESCP) for Kambarata 1 Hydropower Plant Project.

4. Analysis of Cumulative Impacts on Biodiversity (domestic impacts).

4.1 CIA (Book 2.4, Chapter 13)

The CIA highlights severe cumulative risks to aquatic and terrestrial biodiversity and ways to mitigate them:

4.1.1. Fragmentation of Aquatic Ecosystems recognized by CIA. The Naryn cascade already blocks long-distance migration. K-1 will fragment short-range migration for threatened species like the Turkistan Catfish. *"A cumulative impact will occur by adding additional HPPs upstream of Kambarata-1. This will gradually increase habitat fragmentation, and this in turn will present additional obstacles to short-range fish migrations in the Naryn River system, and it will lead to an increasing number of small, genetically isolated populations."* *"Sequential dams (e.g., Kambarata-2, Toktogul) reduce river connectivity and disrupt migratory routes for fish and wildlife."* (13.5.4 Key Cumulative Impacts).

However, despite the presence of an approved plan by Kyrgyz Government to build additional 35+ dams in the Naryn river basin, no effort is made by the CIA to assess potential river fragmentation and suggest specific actions to address this impact.

4.1.2. Habitat Loss. Permanent inundation of Natural Habitat (possibly Critical Habitat) for flora and fauna. *"Cumulative stress from habitat loss, alteration of seasonal flow regime, and change in habitat type may cause decline of threatened species and ecosystem resilience, specifically fish stocks."*(13.5.4 Key Cumulative Impacts).

Although the CIA points to the loss of aquatic habitat, it does not closely explore potential cumulative impacts. In some sections it fails to mention aquatic habitat loss as a major impact.

4.1.3. Invasive Species Risk. The CIA explicitly warns that *"introduced fish species... would likely benefit from changes in habitat to a lake environment... resulting in a cumulative reduction in biodiversity"* (Section 13.4.19.3). *"Mitigation measures for the cumulative impacts on fish within the Naryn basin should be detailed in a regional fish and fisheries management plan. It is not recommended to introduce exotic fish species such as Rainbow Trout, given the negative impacts on native fish species from such introductions"*.(13.4.25.3 Fish and Fish Migration). *"In order to minimise adverse impacts on native populations of fish in future, aquaculture with non-native species must not be permitted in the Kambarata-1 project area."*

It is not clear who and how will prepare the "Regional fish and fisheries management plan", it is not mentioned in any other ESIA documents. Despite clear warning in the CIA, the artificial breeding and introduction of non-native trout is the central, most expensive element of the BMP.

4.1.4. Mercury Bioaccumulation. The CIA notes reservoir creation causes methylmercury increases, affecting fish reproductive fitness and food chain safety. This effect is well known from other reservoirs around the world, but the CIA contains no specific assessment related to particular reservoirs of Central Asia.

4.1.5. The CIA clearly argues for establishment of “no go zones” and protected areas to offset river destruction. *“Impacts from the Project are expected to be reduced from the implementation of mitigation measures including protecting areas of retained habitat in no-go zones (13.4.19 Biodiversity)”*; *“Biodiversity Offsets: Establish protected no-go zones, protect areas containing habitat the same as that to be lost due to project activities (as stated in the BMP)...”*. However, it neither suggests potential locations nor outlines the process which will allow the retention of the most important and non-modified natural stretches of the river. The BMP does not have such measures.

4.1.6. Chapter 10 Impacts

“The initial reservoir filling is expected to result in conversion of aquatic habitat, comprising approximately 9 sq km of permanent river type of inland wetland habitat, which constitutes a near-natural habitat. This is expected to lead to loss or degradation of the concerned natural aquatic habitat, thereby reducing availability of feeding or spawning habitats for the associated aquatic fauna. Based on the impact significance matrix, the said habitat loss or degradation is classified as regional in extent, high in magnitude and long-term in duration. As per the impact significance evaluation scale, the said impact is deemed of major significance.” (10.4.1.8.10 Degradation of Aquatic Habitat)

4.2 Reflection in Sub-Plan 10 (Book 4.1, Biodiversity Management Plan - BMP)

The BMP proposes:

4.2.1. An eDNA study for the endangered Pike Asp, which is somehow confined only to the inundated area and vicinity and does not extend downstream.

4.2.2. "Conservation Hatchery" for non-native trout and Turkestan catfish (a species never introduced in aquaculture before).

4.2.3. A general "Invasive Alien Species (IAS) Management Programme" (Section 7.2.2) is mentioned, but deprived of any specific targets and meaningful activities.

4.2.5. Inadequate mitigation of habitat loss. While the loss of tiny rock outcrops and woody thickets are proposed to be mitigated by rare plan relocation, the 60 km of Narun River (9km² of natural aquatic habitat), and 50 km² of natural grasslands are left without biodiversity mitigation. When the RwB asked for the reason, it got a shocking response that “aquatic river habitat” will not be lost, but converted into reservoir habitat, therefore it does not require mitigation (!!). This is a blatant violation of the “No Net Loss” requirements of the World Bank’s ESS6, which is even more illegitimate in the light of anticipated further fragmentation by 35 dams.

4.3. Recommendations for Compliance with WB ESS6 and ESF as a whole

4.3.1. Feasibility of Offsets. To satisfy ESS6 “No Net Loss” requirements for "like-for-like or better" offsets, the BMP must include measures to *“Establish protected no-go zones, protect areas containing habitat the same as that to be lost due to project activities”*. First and foremost, this should apply to natural river habitats modified into reservoirs. Protection in perpetuity of other

free-flowing rivers with comparable biodiversity values seems to be the most feasible solution. Legal protection status for such offset sites should be pursued.

4.3.2. Pike Asp, Aral Barbel and Shovelnose Sturgeon Habitats" should be inventoried both upstream and downstream of Naryn Hydropower Cascade to provide a clear picture of current status of the species populations. The BMP proposes translocating Pike Asp (and other species) to "Alternative Habitats" outside the study area. The CIA notes that the river is heavily fragmented by cascades and 35+ new dams are planned upstream. There is a lack of evidence in the BMP that viable, non-fragmented alternative habitats exist upstream that would not be impacted by the "cumulative pressure" of future planned dams (Upper Naryn Cascade) mentioned in the CIA.

4.3.3. Explicit Prohibition of Invasive Aquaculture. Update BMP Section 7.2.2 to explicitly ban the introduction of non-native fish species for aquaculture within the K-1 reservoir and vicinity, aligning with the CIA's warning to prevent the extinction of native endemics.

4.3.4. Mercury Monitoring Program. Add a specific monitoring parameter to the BMP (or link to the Water Quality Plan) for methylmercury levels in fish tissue, commencing baseline testing immediately and continuing through operation.

4.3.5. The perpetual protection of other free-flowing rivers with comparable biodiversity values and other action points suggested above should be included into the Environmental and Social Commitment Plan (ESCP) for Kambarata 1 Hydropower Plant Project.

5. Public participation and corruption-free decision-making.

5.1. The CIAs interpretation of the ESPOO Convention is not supported by assessment of the Project's ability to fulfill requirements, and has no specific implementation plan.

5.1.1. The CIA simply lists the Convention's requirements:

"To effectively manage cumulative transboundary impacts throughout the lifecycle of the Kambarata-1 HPP in accordance with the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention), the following steps are recommended for the project proponent:

... • Hydrological Scenario Planning. Establish a mutually agreed Impoundment Plan that accounts for the timing of the start of impoundment, with consideration given to reducing the impoundment period by aligning it with peak meltwater inflows. This approach aims to mitigate downstream water shortages and ecological stress. The Plan should also outline operational protocols under varying hydrological conditions (e.g., dry, average, wet years) to manage risks during reservoir filling....For a multi-country technical working group to co-develop and review the Impoundment Plan, ensuring alignment with ecological flow requirements and downstream water availability needs.

...Formal Consultation and Transboundary Coordination

• Public Participation: Facilitate public hearings and consultations within affected transboundary regions to ensure transparency, inclusivity, and the integration of local perspectives and concerns.

... Establishment of a Transboundary Monitoring and Oversight Mechanism//Cross-Border Monitoring Systems: Establish robust transboundary monitoring mechanisms that enable real-time

tracking of water quality, river flow, and the ecological health of shared resources across national boundaries.

- *Joint Monitoring Committee: Establish a transboundary monitoring committee with representatives from all affected countries to oversee compliance with agreed-upon mitigation measures, monitor cumulative impacts, and facilitate information sharing.* (13.4.27 Managing Cumulative and Transboundary Impacts, pp.166-167).

5.1.2. The basic requirement to hold consultation in affected transboundary regions has been already violated. The CIA recommends: *“Public Participation: Facilitate public hearings and consultations within affected transboundary regions to ensure transparency, inclusivity, and the integration of local perspectives and concerns.”* The transboundary public consultations in November 2025 was held November 4–5, 2025, in Istanbul, Türkiye. This obviously excludes local stakeholders in potentially affected regions of Tajikistan, Uzbekistan and Kazakhstan from participation in public consultations.

5.1.3. Convention on Public Participation in Decision-Making and Access to Justice in Environmental Matters (Aarhus Convention, 1998). The Stakeholder Engagement Plan (SEP) issued in August 2025 says that KB-1 PMO is still taking initial steps to ensure transparency and inclusive access to information. So the Project is still not fully compliant with public participation requirements a year after first consultations were held. The SEP has no dedicated section on transboundary consultations and does not include measures to engage citizens and organizations from riparian countries, only governments (or “countries”) are mentioned.

5.1.3. Lack of clarity on transboundary coordination and monitoring.

The CIA contains no details on steps taken and planned to establish Transboundary Monitoring and Oversight Mechanism//Cross-Border Monitoring Systems//Joint Monitoring Committee. Among 22 mitigation plans presented in the ESIA we did not find any document describing establishment and management of those mechanisms. There is a high risk that decisions will be made at political level, without much input from environmental and water management experts and agencies, and as a result mitigation of environmental impacts will be neglected.

This is vividly illustrated by the SEP’s Table 3-3: Summary of ESIA Consultation Held at National Level in November 2024: *“(Kyrgyzstan)” Ministry of Energy response: The project will not affect irrigation in neighboring countries, as confirmed in current cumulative impact assessment.”* The CIA clearly emphasizes the opposite evidence: without robust transboundary mitigation measures, the Project may cause serious negative transboundary impacts for downstream ecosystems and irrigation. This means that the lead Ministry, which has no mandate to manage irrigation or environmental impacts, easily distorts information and is unlikely to devote serious efforts to development of eco-hydrological Transboundary Monitoring and Oversight Mechanism.

5.2. No measures to eliminate risk of retaliation and

SEP explicitly says: *“The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.”*

Apart from a question, what is the policy for stakeholders *who DO NOT share the Borrower’s views about Bank-financed projects*, this is still a very weak statement not supported by credible actions.

Given the predominant political atmosphere today in Kyrgyzstan, it should be understood that the Project's opponents are rightful subjects to reprisals, while the obedient stakeholders are protected.

A year into the project consultations, the PMO is yet to establish a grievance mechanism. No other information about effective measures to prevent reprisals against stakeholders who disagree with the project.

5.3. Recommendations on Public Participation

5.3.1. Given these challenges, the World Bank, EBRD, EIB, ADB and other potential financiers should request from the government of Kyrgyz Republic that NGOs, activists and journalists are able to track all the stages of ESIA and be not afraid to say their criticism without negative consequences. The international banks should require the government cooperation with local activists and experts and involve them actively in the initial stages.

5.3.2. The World Bank as the key financing agency must establish a secure and anonymous grievance mechanism and publicly state their commitment to protecting stakeholder voices from any form of reprisal.

5.3.3. Establishment of a Transboundary Monitoring and Oversight Mechanism between all four basin countries should ensure participation of water and environmental agencies, experts from all four countries and consultation mechanisms engaging local communities in downstream areas of four countries. Such a mechanism should be designed, assessed, included into dedicated action plan and agreed between countries before the Project approval.

5.3.4. Action points suggested above should be operationalized as legally binding requirements and included into the Environmental and Social Commitment Plan (ESCP) for Kambarata 1 Hydropower Plant Project.