

ROGUN ALERT



To: World Bank Directors

Re: Warning and Request for Meetings Regarding the Rogun HPP Project

Dear World Bank Directors:

We remain highly distressed that on the "[Sustainable Finance for Rogun Hydropower Project](#)" webpage¹, the project was initially scheduled for the Board Decision on 31 July, 2024, then haphazardly moved to another very close decision-making date: 30 September 2024. Throughout 2024 we have been closely examining development of this dangerous project and would have expected it wouldn't be ready for Board discussion at least until later next year, if ever. We believe that currently the project documentation does not meet the World Bank's ESF standards and lacks public disclosure of crucial components.

Since January 2024, civil society groups have sent several appeals urging the World Bank to address the key risks and disclose full environmental & social safeguards documentation, but largely received from the Management evasive promises and general assurances that everything is up to standard. We believe that the project is associated with unprecedented risks, which are omitted or superficially treated in the E&S instruments, while stakeholder engagement has been sporadic and ineffective:

1. When the World Bank assisted with development of the Rogun Project in 2010-2014 five international riparian consultations were organized to discuss the project. In January 2024, the [CSOs requested](#) that after ESIA documentation is fully disclosed, a series of international consultations should be organized for all interested stakeholders². Later, we learned that "riparian consultations" were held behind closed doors without prior public announcement in November 2023. Yet proper E&S documentation was – and still is – not available. Later, the [World Bank promised](#) that international groups will be invited to a new round of public consultations. The only invitation received in this regard was to a consultation session convened on June 6th 2024 on resettlement policy held in Tajik language without translation.
2. The dam project documentation downplays and neglects diverse and problematic consequences of resettling 50.000 people, which will inevitably have massive environmental and social impacts. The Resettlement policy fails to address needs of people who will be economically displaced by the Rogun HPP project, either those on margins of the planned reservoir, or those dependent on river flows

¹ <https://projects.worldbank.org/en/projects-operations/project-detail/P181029>

² January 18 CSO letter https://docs.google.com/document/d/1-i_KhTVpgJpnTNsgm-wGeVZcQz2eEYdbS2KUpYAvDY/edit?usp=sharing

downstream of Vakhsh cascade. Such negligence is especially dangerous in a society with few political and individual [freedoms](#), low levels of transparency, the [highest level of corruption](#), and [exacerbating](#) human rights violations. At the June 6 [consultations](#) we were bluntly told that Tajikistan is a poor country and cannot provide fair compensation to resettled people, and that to date, the Resettlement Framework does not conform to the current WB standard (ESS5)³. In such circumstances, the fact that at least 7297 people have been already displaced and 42,000 are still expected to be [resettled](#), with unknown numbers to be economically displaced, should be a red flag for all Board Members.

3. The ESIA fails to develop measures mitigating major negative impacts on downstream ecosystems, including the reduction of the river flow to the Aral Sea, impacts on the "[Tugay Forests of the Tigrovaya Balka](#)" World Heritage site in the Vakhsh River floodplain, degradation of habitat of [critically endangered endemic sturgeons](#), whose survival is fully dependent on flow regime of Vakhsh and Amu Darya rivers. In February 2024, [CSOs addressed](#) the World Bank and UNESCO asking to conduct impact assessments and prevent harm to Tigrovaya Balka World Heritage site and two critically endangered endemic sturgeon species⁴. Unfortunately, we failed to receive any direct responses to our questions.
4. In March 2024, [CSOs requested](#) to improve E&S documentation, because it is incomplete, fragmented and partly based on outdated and false information⁵. Little has changed since then. The detailed ESIA (volume 2), "upgraded" Cumulative Impact Assessment, Resettlement Action Plan 2, and Biodiversity Action Plan have not yet been disclosed and subjected to public consultation. In stark contrast to 2010-14 assessments, none of the reports produced by two "panels of experts" have been made public. The Draft Environmental and Social Management Plan and Environmental and Social Commitments Plan look like empty placeholders, and hardly can be finalized now due to lack of many specific assessments. Analysis of alternatives is grossly flawed as it is based on 2010-14 data, all of which is no longer relevant to decision making.
5. The World Bank insists that the newly acquired aim of this megaproject is decarbonization of Tajik and Central Asian energy sector. It is obviously the most costly and time-consuming decarbonization option. With emissions exceeding 102g CO₂ e/KWH, the Rogun hydropower cannot contribute to the decarbonisation of the Tajik energy system, which has a similar emission intensity (106g CO₂ e/KWH). If Uzbekistan and Kazakhstan decide to rely on energy imports from this source, the project could delay Central Asia's green transition by 15 years or more. Meanwhile, the exorbitant cost of the Rogun Dam project will make the electricity produced by it unaffordable to poor populations of Tajikistan and other countries.

³ 4 July 2024 letter <https://docs.google.com/document/d/1uv-NvIZH44kSeaZyjI0DD6H7gMfBKWrMX8GQFv3BLO/edit?usp=sharing>

⁴ 27 February 2024 letter <https://docs.google.com/document/d/1uv-NvIZH44kSeaZyjI0DD6H7gMfBKWrMX8GQFv3BLO/edit?usp=sharing>

⁵ 4 March Letter <https://docs.google.com/document/d/1zELvCygmQ>

6. Undertaking the project, which completion, according to IMF, will require more than USD 6.4 billion may cause major distortions in Tajik economy, with “non priority” state investment in education, medicine and other socially important sectors cancelled, reduced and postponed, due to prioritizing construction of “the tallest dam in the world”. Electricity tariff hikes aimed to recover costs of such construction will further exacerbate lives of poor Tajik rural populations.

The questions above are only some of many aspects not resolved in current project documentation, which demonstrates that responsible decisions on the project cannot be taken before all assessments and mitigation plans are developed and subjected to comprehensive and meaningful public consultations. We call on you to postpone decision making of the Board until all those aspects are satisfactorily resolved.

We hope to arrange a time at your convenience to discuss these concerns and forward-looking options that could avoid the prospect of undermining World Bank ESF standards from the get-go. For any follow up, please email International Rivers’ representatives, Joshua Klemm (josh@internationalrivers.org) and Tanya L. Roberts Davis (tanya@internationalrivers.org).

In light of the time sensitive nature of the situation, we look forward to a prompt response. Thank you for your time and consideration.

Sincerely,

International Rivers
Rivers without Boundaries
CEE Bankwatch
NGO Forum on ADB
Urgewald