



*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