

Positions, comments and proposals developed by representatives of civil society organizations on the results of the information session on the construction of Rogun HPP (Tajikistan), which was held on 23.05.2025 from 17:00 to 19:00 at the World Bank office in Turkmenistan.

A group of NGOs and civil activists from Turkmenistan summarized the process of discussion of the Rogun HPP financing project, both within the framework of the above-mentioned "Information Session" and in retrospect of the whole process of discussion of the Rogun HPP EIA, including procedural and substantive contexts of public awareness and implementation of the right of access to information.

Based on the analysis of the entire available body of information, we have come to the conclusions that:

1. In order to identify and prevent damage, it is essential that the ESIA and all other tools be extended to thoroughly assess impacts on the downstream reaches of the Amu Darya delta, including its confluence with the Aral Sea and its rural periphery with oases vulnerable to droughts in terms of predicting the flow regime in each downstream section of the river as well as its dependent components: Freshwater biodiversity, the river's ecosystem processes (services), local communities and their river-related socio-economic activities (e.g. irrigation). The ESIA should consider all possible scenarios for water regulation of the Rogun HPP and the cascade of downstream impacts in the Amu Darya basin.
2. International financial institutions should support a thorough analysis of alternative options for project completion based on the most up-to-date, scientifically, environmentally, socially and economically sound data. First and foremost, options for completing the Rogun project that would reduce the height of the dam and utilize the saved resources to diversify the Tajik energy system, which is overly dependent on hydropower, should be considered. The main motivation for continuing the construction of the Rogun hydropower plant is to reduce the carbon footprint and improve the economy of Tajikistan, but when the water supply of the downstream countries of the Amu Darya River, whose water availability is already very low, is directly dependent on the construction of such a huge hydroelectric facility, it is more humane to seek alternative renewable energy systems in Central Asia, and thereby guarantee the stable production of affordable electricity on the basis of climate justice principles. The analysis of alternatives should also include a comparison of different modes of operation of the Rogun hydropower plant in order to be able to assess the full range of negative impacts and benefits it could bring to the downstream population and ecosystems of the Aral Sea basin.
- (3) Of the many possible alternative scenarios for the completion of the Rogun HPP project, priority should be given to those that can guarantee that:
 - a) the filling and operation of the Rogun HPP reservoir will not exacerbate the social, environmental, and economic impacts of the Aral Sea crisis, the largest man-made environmental disaster in Asia,
 - b) the ESIA and resettlement policy will take into account the impacts and needs of the downstream population and minimize the number of resettlers and economically displaced persons as a result of the project,
 - c) binding equitable agreements between all riparian countries will be developed prior to funding decisions to ensure that the Rogun HPP and other new water infrastructure does

not degrade downstream flow conditions for natural ecosystems and local communities dependent on irrigation;

d) the impact of reduced inflow to the Amudarya delta during the reservoir filling period and its consequences for flora and fauna will be assessed and measures will be taken to prevent damage;

e) continuous and thorough monitoring of the condition and operation of the dam will be carried out with the participation of specialists from all stakeholders, including Turkmenistan and Uzbekistan.

4. It should be taken into account that the Rogun HPP dam is located in a seismically dangerous zone - the Ilyak-Vakhsh fault, as well as the presence of a salt layer about 100 meters thick, and the construction of a dam 335 meters high will greatly affect the level of safety of the reservoir. There is a perception that Tajikistan is seeking to build a hydropower plant with the highest dam in the world, which is unnecessary.

Most of the negative impacts (population displacement, flow disturbance, economic difficulties) can be minimized by reducing the height of the dam and the volume of the reservoir.

Emergencies should not be ruled out, as the construction of large hydraulic engineering facilities in seismic risk zones in complex hydrological and geological conditions may lead to their failure. During the construction of such gigantic hydraulic structures, it is necessary to calculate all the risks of impact on the environmental and social environment.

We propose:

a) publish all the reports of the dam safety group,

b) a detailed assessment of the risks of breaches and accidents should be made available for discussion,

c) a basin-wide contingency plan, including mechanisms to compensate downstream populations,

d) include in the risk assessment the threat of a terrorist or military attack on the Rogun HPP and measures to prevent such an attack.

5. It is necessary to conduct studies to determine the "Environmental Flow" for the Vakhsh River downstream of the Nurek HPP and for the Amu Darya River itself and to include in the recommendations the environmental releases downstream of the Nurek HPP, which will be supported by the Rogun and Nurek HPP operation regimes. Environmental flow regulation should be based on the environmental and social requirements of maintaining the "valuable components" of the downstream environment, and should be developed with the participation of downstream specialists and the public. The ESIA and biodiversity action plan should also include targeted measures to protect and restore globally threatened species (e.g., yellow sturgeon) and critical river ecosystems (e.g., floodplain riparian areas).

6. Public participation of all riparian countries of the Aral Sea basin is required. Prior to project funding, downstream communities in all riparian countries should be consulted, especially in potentially affected areas, including appropriate presentation of results in national languages, minority languages and Russian as a common language for transboundary communication in the region.

The Stakeholder Engagement Plan (SEP) does not have a specific timetable or clear procedures for consultation on key EIA documents that are listed in the EIA as subject to disclosure.

As a consequence, prior to further steps on project financing, we request that all relevant project documents be made available for consultation in Turkmenistan, including:

- a) the full revised EIA report (primarily Volume II with full technical data), including a special chapter with an in-depth assessment of impacts on downstream riparian countries and a chapter on alternatives analysis revised on the basis of up-to-date data;
- b) impact assessment in accordance with UNESCO requirements for tugai forest ecosystems, yellow sturgeon of the World Heritage site "Tigrovaya Balka" in Tajikistan and candidate site Amu Darya State Nature Reserve of Turkmenistan downstream of the Vakhsh cascade;
- c) cumulative effects assessment, including an analysis of the interaction between the impacts of the Rogun HPP and the Kosh-Tepa Canal;
- d) a biodiversity management plan with a feasibility study on artificial floods/environmental flows downstream of the Vakhsh Cascade;
- e) revised "Resettlement Policy" and Resettlement Action Plan 2 (new parts related to mitigation and compensation of downstream population impacts);
- f) contingency plan for the Vakhsh Cascade, including assessment of potential impacts in case of dam failure or breach, as well as coordination and compensation mechanisms for the downstream population;
- g) environmental and social commitments plan includes specific measures to prevent/mitigate potential impacts, including the development and maintenance of environmental flows downstream of the Vakhsh hydropower cascade, in relation to possible flow alteration by the Rogun reservoir;
- h) an environmental and social management plan, including a full range of environmental and social mitigation measures for downstream countries.

7. There are no recommendations to achieve additional legal safeguards for the safe operation of the Rogun HPP for the riparian countries.

It is necessary to develop binding mechanisms to guarantee safe and mutually beneficial use of the Rogun HPP in the context of all hydraulic structures in the transboundary basin, as well as to develop descriptions of actions and mechanisms for liquidation of consequences from damage in natural and anthropogenic accidents and mechanisms for their financing.

8. Before financing the Rogun HPP, it is necessary to conclude Agreements between the states of the region on the use and management of regional water resources, taking into account the establishment of the Rogun HPP, climate change, and other water structures built and under construction in the region, with the participation of representatives of the Amu Darya basin states and international organizations.

The agreement should include binding mechanisms, including effective sanctions for violators (see WB 2014 note on the results of the last ESIA).

We express our gratitude to the World Bank Project Team for organizing the "information session", but we expect that the next announced events will be more prepared and substantive, including maximum expansion of the list of submitted materials and documents sent in advance, within a reasonable timeframe for detailed study.

Regards,

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