

UNOFFICIAL TRANSLATION

Dear colleagues,

The Project Management Group for Energy Facilities Construction under the President of the Republic of Tajikistan (PMG Rogun) and the Technical Assistance for Financing Framework Rogun Hydropower Project extend their respectful greetings to you.

Thank you for your active participation in the World Bank Public Information Session in Turkmenistan on the Rogun HPP construction, which was held in the World Bank office in Turkmenistan on May 23 this year in a hybrid format. We also express our gratitude for sending us for consideration a summary of your consolidated position and proposals of the CSO representatives in Turkmenistan based on the findings of this meeting.

We have carefully considered all your suggestions and comments regarding the development of the Rogun HPP project. We hereby send you our clarifications and responses to the comments of the CSO representatives in Turkmenistan. Please kindly see them in the attachment to this communication.

Best regards,
PMG Rogun team

With kind regards,
Pulod Muhiddiniyon
Director of PMG EFC under the
President of the Republic of
Tajikistan

Proposals from representatives of public organizations in Turkmenistan

№	Comment	Response
1	To identify and prevent damage, it is essential that EIA and all other instruments be expanded to thoroughly assess the impact on the lower reaches of the river, 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 section of the river downstream, as well as its dependent components: freshwater biodiversity, river ecosystem processes (services), local communities and their socio-economic activities related to the river (e.g., irrigation).	There is no need to extend the scope of the EIA for the Rogun HPP to the lower reaches of the Amu Darya delta, as the 2014, 2023, and 2025 EIAs clearly indicate that the Rogun HPP project will have no impact below the Nurek Dam. The results of all impact assessments of the Rogun HPP, i.e. those carried out in 2011-2014 and 2022-2025, show that the Rogun HPP, in conjunction with the Nurek HPP, will be able to operate in such a way as not to alter the existing water regime of the Vakhsh River (¹). According to the results of these studies and assessments, the Rogun HPP construction project was found to be technically feasible, economically viable, and compliant with international safety standards, both from a technical and a social and environmental point of view.
	The EIA should consider all possible scenarios for water resource management at the Rogun HPP and the cascade of impacts on the lower reaches of the Amu Darya basin.	There are two large reservoirs on the Amu Darya and Vakhsh rivers with a total capacity of 18.3 km³ and usable capacity of 9.8 km³, i.e. the Nurek Reservoir on the Vakhsh River (usable capacity - 4.5 km³) and the Tuyamun Reservoir on the border between the middle and lower reaches of the Amu Darya (usable capacity - 5.3 km³). At the same time, the Rogun HPP is being built with a total reservoir capacity of 13.3 km³ and a usable capacity of 8.6 km³. The Rogun HPP reservoir, together with the Nurek, Tuyamun and other existing reservoirs, can provide full multi-year regulation of the Amu Darya flow with a coefficient of $\alpha=0.92$ (guaranteed yield of 61.5 km³), which meets the requirements of the of water consumers in the basin countries at the level of depletion of the basin's own resources.

¹ Water regime: changes in water level, flow velocity, water consumption, and water discharge.

		Due to the need for guaranteed water supply in accordance with the limits set by the countries, the construction of the Rogun HPP was planned and reflected in the Revised Scheme for the Integrated Use and Protection of Water Resources of the Amu Darya River. Guaranteed additional flow from the Rogun reservoir for irrigation needs will be 5-5.9 km⁽³⁾per year. Thus, no damage or impact on the environment or local communities downstream is anticipated.
2	International financial institutions should support a thorough analysis of alternative options for completing the project based on the most up-to-date, scientifically, environmentally, socially, and economically sound data.	With support from the World Bank, an analysis of alternative options for completing the project was conducted in 2011-2014 as part of the EIA and SEA, and this analysis was updated in 2022-2025 as part of the SEA. All these assessments confirmed that the existing project option with a rockfill dam and a clay core 335 meters high is the most viable.
	First and foremost, options for completing the Rogun project that would reduce the height of the dam and use the resources saved to diversify Tajikistan's energy system, which is overly dependent on hydropower, should be considered.	Project options with a reduced dam height were also considered in 2011-2014 as part of the ITO and EIA, as well as in 2022-2025 as part of the EIA, and were found to be less viable than the existing option of constructing a 335-meter-high dam. The diversification of Tajikistan's energy system is being carried out not at the expense of, but in parallel with the construction of the Rogun HPP. For example, this year will see the start of construction of a solar power plant² with an installed capacity of 200 MW in the Sughd region of the republic.
	The main motivation for continuing the construction of the Rogun HPP is to reduce the carbon footprint and improve Tajikistan's economy, but when the water supply of the	No, reducing the carbon footprint is a positive side effect of the project. There are several main motivations for building the Rogun HPP in this particular configuration:

² The 2030 Strategy of the Republic of Tajikistan, adopted in 2016, sets a target of diversifying energy sources by 10%, including through photovoltaic solar energy . In particular, five solar power plants and one wind power plant with a total installed capacity of almost 2 GW will be built in Tajikistan in the near future.

	countries in the lower reaches of the Amu Darya River, whose water content is already very low, it is more humane to seek alternative renewable energy systems in Central Asia, thereby guaranteeing stable production of affordable electricity based on the principles of climate justice.	a) ensuring constant and uninterrupted access to energy for all residents (which in today's world means ensuring access to social benefits for the population, especially in rural areas), all sectors of the economy, and increasing the republic's energy security; Currently, it is estimated that millions of Tajikistan's inhabitants, primarily in rural areas, have limited access to electricity during the winter months. b) enabling the Vakhsh hydropower cascade to withstand catastrophic floods that could result in huge human casualties and widespread destruction in populated areas; currently, none of the dams in the Vakhsh hydropower cascade has this capability; The construction of the 335-meter-high Rogun HPP rockfill dam will make it possible to protect infrastructure and populations downstream (including Afghanistan, Uzbekistan, and Turkmenistan) from the effects of probable maximum floods (PMFs). c) extending the life of the Nurek hydropower plant with an installed capacity of 3,000 MW (which currently generates about 50 cent of the total electricity consumed annually in Tajikistan) for at least another 100 years; if the Rogun dam is not built, the Nurek HPP will be decommissioned in the coming years due to sedimentation processes.
	The analysis of alternatives should also include a comparison of different operating modes of the Rogun hydropower plant in order to assess the full range of negative impacts and benefits it may have on the population of the lower reaches and the ecosystems of the Aral Sea basin.	There is no need to re-analyse the alternatives. See the answers above. Due to climate change, the likelihood of large-scale and extreme floods on the Vakhsh River is increasing. This means that only the construction of the Rogun HPP rockfill dam with a design height of 335 meters will make it possible to protect the infrastructure and population downstream (including Afghanistan, Uzbekistan, and Turkmenistan) from the effects of probable maximum floods (PMFs).
3	Of the many possible alternative scenarios for completing the Rogun hydropower plant project,	There is no need to re-analyze the alternatives. See answers above.

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 consequences of the Aral Sea crisis, the largest man-made environmental disaster in Asia;	As indicated above, the operation of the Rogun HPP reservoir will not affect the existing water regime of the Vakhsh River. The reservoir will be filled within the quotas of the Republic of Tajikistan, calculated annually by the ICPC/BWC Amu Darya.
b) The EIA and resettlement policy will take into account the impacts on and needs of the population living in the lower reaches of the river and minimize the number of resettlers and economically displaced persons as a result of the project implementation.	The EIA, resettlement policy, and plans already take into account the impacts and needs of the population and minimize the number of resettled and economically displaced persons as a result of project implementation. Currently, special attention is being paid to the resettlement of households (people affected by the project). They are now receiving compensation that meets IFI requirements, and depreciation charges on real estate in their former places of residence have been waived. Resettlement is not considered complete until livelihoods have been restored (livelihoods) have been restored. The final version of the Stakeholder Engagement Plan has been developed, and a rigorous Framework for Resettlement and Livelihood Restoration, Resettlement Action Plan 2 for 2017-2026, etc. have been prepared. Resettled residents do not suffer any significant economic, social, or moral damage. Resettlement is largely in line with all international standards. This is confirmed by the results of the audit of the first phase of resettlement. In all cases, the living conditions of the resettled people have improved. For example, before resettlement, most of the kishlaks (villages) were crowded, with winding streets and dead ends, and even with buildings built on steps. Now, in their new settlements, they have and will have a village-type layout with all the necessary utilities, etc.

	Previously, in many small kishlaks, children were forced to walk 4-5 km every day in rain and snow, risking their lives and health on mountainous, impassable paths and broken roads to get to school, which was usually located in a larger kishlak. Now, in each new settlement for the residents of , roads, water supply systems, kindergartens, schools, and medical facilities are being built.
c) Before a decision on financing is made, binding and equitable agreements will be developed between all riparian countries to ensure that the Rogun Hydropower Plant and other new water infrastructure projects do not adversely affect downstream flow conditions for natural ecosystems and local populations dependent on irrigation;	Issues related to the regulation of water resources of the Rogun HPP shall be resolved taking into account the interests of all countries of the Amu Darya River basin through the provisions of the Agreement between the Governments of the Central Asian Countries on the Joint Use and Protection of Transboundary Water Resources (Almaty, February 18, 1992) and the activities of the Interstate Water Resources Coordination Commission of Central Asia (IWCC). Within the framework of these regional and bilateral cooperation mechanisms in the water sector, the countries of Central Asia can resolve water issues taking into account their mutual interests. See also the answers above.
(d) An assessment of the impact of the reduction in the inflow to the Amu Darya delta during the filling of the reservoir and its consequences for flora and fauna will be carried out and measures to prevent damage will be taken;	During the initial filling of the reservoir and after the Rogun HPP reaches its design capacity, the Parties shall resolve water management issues related to the operation of the Rogun HPP based on the provisions of the Agreement between the Republic of Kazakhstan, the Kyrgyz Republic, the Republic of Uzbekistan, the Republic of Tajikistan, and Turkmenistan on cooperation in the joint management, use, and protection of transboundary water resources dated February 18, 1992, and guided by the decisions adopted in accordance with the established procedure within the framework of the ICWC.
(d) The condition and operation of the dam will be monitored on a regular and thorough basis	This issue falls within the competence of the governments of the riparian countries. If a relevant multilateral agreement is reached and funding

	with the participation of experts from all interested parties, including Turkmenistan and Uzbekistan.	for the above-mentioned experts is provided by Turkmenistan and Uzbekistan, this recommendation can be accepted.
4	It should be noted that the Rogun HPP dam is located in a seismically hazardous area—the Ilyak-Vakhsh fault zone—and that there is a salt layer approximately 100 meters thick, and the construction of a 335-meter-high dam will have a significant impact on the safety of the reservoir.	The problems themselves and the proposed measures to address the seismicity of the Rogun dam site and the salt layer are discussed in detail in the ITEO. Seismic risks are assessed as part of the design of the Rogun HPP, and the design solutions adopted take into account the possibility of underground tremors with a magnitude of 9. Design solutions are also provided to address the salt dome issue. In addition, to update the available data, project consultants are currently completing additional studies on seismology, sedimentation, hydrology, and climate change. A dam safety panel consisting of internationally recognized experts is continuously monitoring the implementation of the proposed mitigation measures during the design and construction of the dam.
	There is a perception that Tajikistan is seeking to build the world's tallest dam, which is not particularly necessary.	This opinion is incorrect, as Tajikistan already has the world's highest dam, the Nurek Dam, with a height of 300 meters. The real "needs" or objectives of constructing the Rogun HPP with a dam height of 335 meters are indicated above.
	Most of the negative impacts (population displacement, disruption of water flow, economic difficulties) can be minimized by reducing the height of the dam and the volume of the reservoir.	Reducing the height of the dam and the volume of the reservoir would eliminate most of the project's most important positive impacts, including the ability to counteract the VMP, extend the life of the Nurek HPP, and ensure constant and uninterrupted access to energy for all residents of the republic. In addition, reducing the height of the dam (as strongly recommended by the Rivers Without Borders coalition and other affiliated experts and organizations) would cut the life of the Rogun hydropower plant itself by almost half, which would negate the economic benefits of the project. At the same time, all negative

	impacts (population displacement, temporary disruption of water flow, economic difficulties) are minimized through the implementation of appropriate mitigation measures.
The occurrence of emergencies should not be ruled out, as the construction of large hydraulic engineering structures in seismic risk areas under complex hydrological and geological conditions may lead to their failure.	A risk analysis has been carried out. See the ITO and EIA documents for 2014, EIA for 2025, and others.
When constructing such giant hydraulic structures, it is necessary to calculate all risks of impact on the environment and society.	A risk analysis has been carried out. See the ITO and EIA documents for 2014, EIA for 2025, and others.
We propose:	
a) publish all reports of the dam safety group,	The reports of the Dam Safety Expert Panel are mainly technical in nature and, subject to an appropriate decision, may be published in specialized publications.
b) submit for discussion a detailed assessment of the risks of breaches and accidents,	The risk of leaks and accidents has been assessed, and there's no need for further discussion. Check out the ITO and EIA documents from 2014, the EIA from 2025, and others.
c) Submit for discussion an emergency response plan for the entire basin, including compensation mechanisms for downstream countries.	The emergency response plan for the Vakhsh HPP cascade is currently being developed. The development of an emergency response plan for the entire Amu Darya River basin or even the entire Aral Sea is possible as a separate task, provided that funding sources (IMFs or interested countries) are available ().
d) Include in the risk assessment the threat of terrorist or military attacks on the Rogun hydropower plant and measures to prevent them.	The assessment of the risk of terrorist or military attacks has been carried out. See the ITO and EIA documents for 2014, EIA for 2025, and others.

5	Research should be conducted to determine the "ecological flow" for the Vakhsh River below the Nurek HPP and for the Amu Darya River itself, and ecological flow rates below the Nurek HPP should be included in the recommendations, which will be supported by the operating regime of the Rogun and Nurek HPPs.	As mentioned above, the operation of the Rogun HPP reservoir will not affect the existing water regime of the Vakhsh River. The operating regime of the Rogun and Nurek reservoirs will be subject to rules for ensuring compensatory releases for environmental and irrigation users in the middle and lower reaches. In other words, the scope of such a study goes beyond the scope of the project.
	Environmental flow regulation should be based on environmental and social requirements for maintaining "valuable components" of the environment downstream and should be developed with the participation of experts and the public in downstream countries.	Nevertheless, this study can be conducted separately from the EIA and other environmental and social instruments of the Rogun HPP project, provided that funding is available (from IFIs or interested countries). See also the answers above.
	The EIA and biodiversity action plan should also include targeted measures to protect and restore globally threatened species (e.g., paddlefish) and critical river ecosystems (e.g., floodplain tuya).	The 2014 SEA and 2025 SEA clearly show that the Rogun HPP has no impact on downstream ecosystems. See also the answers above.
6	The participation of the public in all coastal countries of the Aral Sea basin is necessary.	Public participation of all coastal countries of the Aral Sea basin is welcome.
	Prior to project financing, consultations with the population of the lower reaches of the river in all riparian countries, especially in potentially affected areas, should be carried out, including the presentation of results in national languages, minority languages, and Russian as the common language for transboundary communication in the region.	Consultations with the population of the lower reaches of the river in all riparian countries are being held. See the Stakeholder Engagement Plan. The final versions of the project's eco-social tools will be presented in Tajik, Russian, and English. Unfortunately, budget constraints do not allow for the presentation of all the project's eco-social tools in the national languages and minority languages of all riparian countries.

	The Stakeholder Engagement Plan (SEP) does not include a specific timetable or clear procedures for consulting on key EIA documents that are listed in the EIA as subject to disclosure.	A clear schedule for consultations on key EIA documents cannot be drawn up because the schedule for these consultations must be continuously coordinated with the governments of the coastal countries during the planning phase, which can sometimes take a very long time. The Stakeholder Engagement Plan is a living document that is continuously updated. Please check our website for updates: https://www.energyprojects.tj
7	There are no recommendations for achieving additional legal guarantees for the safe operation of the Rogun HPP for coastal countries. It is necessary to develop binding mechanisms to ensure the safe and mutually beneficial use of the Rogun HPP in the context of all hydrotechnical structures in the transboundary basin, as well as to develop descriptions of actions and mechanisms to eliminate the consequences of damage caused by natural and man-made accidents and mechanisms for their financing.	Currently, relations between the countries of Central Asia are generally characterized by complex interactions between economic, political, and cultural factors that influence their cooperation. The countries of Central Asia are guided by the provisions of the Agreement between the Republic of Kazakhstan, the Republic of Kyrgyzstan, the Republic of Uzbekistan, the Republic of Tajikistan, and Turkmenistan on cooperation in the joint management, use, and protection of transboundary water resources dated February 18, 1992 , and the decisions adopted in accordance with the established procedure within the framework of the ICWC. Unfortunately, it is currently impossible to develop new or additional binding mechanisms to ensure the safe and mutually beneficial use of all hydrotechnical structures in the Aral Sea basin.
8	Prior to 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 construction 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.	Issues related to the regulation of water resources at the Rogun HPP will be resolved taking into account the interests of all countries in the Amu Darya River basin through the provisions of the Agreement between the Governments of the Central Asian Countries on the Joint Use and Protection of Transboundary Water Resources (Almaty, February 18, 1992) and the activities of the Interstate Coordinating Water Commission of Central Asia (ICWC).

	The agreement should include enforceable mechanisms, including effective sanctions for violators (see the 2014 World Bank note on the results of the previous SEA).	Within the framework of these regional and bilateral cooperation mechanisms in the water sector, the countries of Central Asia can resolve water issues taking into account mutual interests. See also the answers above.
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