

To: President Masoto Kanda,

Asian Development Bank

Subject: Noncompliance of Rogun Hydropower Project with ADB Safeguard Policy Statement (2009) – Request to Refrain from Financing

CC: Leah Gutierrez, Director General for ADB's Central and West Asia Department,

Nianshan Zhang, Head of ADB Safeguard Office

Christoph Meindl, Project Officer

August 1st, 2025

Dear President,

My undersigned civil society organisations, would like to express serious concerns about the Asian Development Bank (ADB) [readiness](#) to consider the USD 500 million financing package for the [Rogun Hydropower Project](#) in [Tajikistan](#) in its current form.

The current project design and documentation received a USD 350 million grant from the World Bank in December, 2025. According to the World Bank, the Rogun HPP will require \$6.29 billion to be completed before the project becomes fully operational by 2040. World Bank investment in the Rogun HPP is supposed to help facilitate \$2.97 billion in grants and concessional funds from development partners and investors, including [the European Investment Bank](#) (EIB), AIIB, and [the European Union \(EU\)](#), to support the construction of the dam.

Construction of the Rogun Dam in the Aral Sea Basin poses a significant threat to the environment, local communities, and regional economies. However, our review shows that Environmental and Social Impact Assessment (ESIA) relies on incomplete data and fails to adequately address the cumulative impacts of water infrastructure projects in the Amu Darya River Basin.

The dam will cause irreversible harm downstream through water shortages and ecosystem degradation, threatening endangered species, including two critically endangered endemic sturgeon species ([Amu Darya Shovelnose Sturgeon](#) and [Small Amu-Darya Shovelnose Sturgeon](#)), and vital floodplain ecosystems, such as the World Heritage Site 'Tugay Forests of the Tigrovaya Balka Nature Reserve.' Additionally, the project jeopardises nature and biosphere reserves in Turkmenistan and Uzbekistan, further threatening the regional biodiversity.

Human rights concerns are pressing equally. The involuntary resettlement of over 60,000 inhabitants due to dam construction in Tajikistan threatens to exacerbate the existing 'migration/displacement crisis' in the already disadvantaged Amu Darya basin downstream. These impacts could trigger increased unemployment and a regional economic collapse. No meaningful consultations occurred in the affected riparian countries during the ESIA preparation. Moreover, the Stakeholder Engagement Plan failed to ensure meaningful consultation with the affected population and protect those who may raise concerns from government retaliation. This oversight is mainly attributed to Central Asia's [restricted civic space](#), repression of dissent, suppression of freedom of speech, and the stifling of civil society. In Tajikistan alone, human rights defenders and journalists face imprisonment and torture for speaking against government initiatives. Indeed, Tajikistan is among the most restrictive contexts on the planet according to the most renowned

independent organisations assessing civic space (e.g. [Civicus Monitor](#), [World Press Freedom Index](#), [Freedom in the World](#) Annual Report). In the current system of governance, it is likely impossible to prevent or mitigate massive human rights violations and loss of livelihoods of local communities resulting from this project, both in Tajikistan and in downstream countries. While such a situation is unlikely to improve significantly over the next few years, development partners [should consider alternatives to large dams and additional measures to support the improvement of governance systems in such countries](#).

Based on our review of the World Bank project documentation, including the Environmental and Social Impact Assessment (ESIA), Environmental and Social Review Summary (ESRS), Resettlement and Livelihood Restoration Framework (RLRF), Environmental and Social Commitment Plan (ESCP), and World Bank Implementation Status Report (ISR), we identified substantial noncompliance with the Asian Development Bank's 2009 Safeguard Policy Statement (SPS).

Key Areas of Noncompliance with the ADB Safeguard Policy (2009)

1. Failures to comply with Safeguard Requirement 1, Environment

The Environmental and Social Impact Assessment (ESIA) disclosed in late 2023 is based on outdated data and fails to assess cumulative and transboundary impacts, particularly in the Amu Darya River Basin. Critical gaps exist in the baseline data, impact modelling, and biodiversity risk assessment. The project design neglects the downstream socio-environmental impacts on Afghanistan, Uzbekistan, and Turkmenistan, where water flow disruptions can affect agriculture, drinking water, and ecosystems. The SPS requires ADB-financed projects to prepare comprehensive environmental assessments, including cumulative and transboundary impacts, and ensure regional cooperation. However, none of these requirements have been adequately addressed.

[Environmental and Social Commitment Plan](#) (ESCP), is required to "prepare, adopt, disclose, and implement, to the satisfaction of the Association, a Biodiversity Management Plan (BMP), consistent with ESS6, which shall include a program to achieve No Net Loss of biodiversity that compensates for the inundation of natural habitat (specifically, floodplain habitat and remnant Juniper forests)". However, BMP have not yet been prepared, and the affected habitats have not been adequately studied, including [the Tugay forests of the Tigrovaya Balka Nature Reserve](#), which is under World Heritage Protection.

In line with the ADB SPS 2009, the detailed biodiversity assessment and categorisation of critical habitats and development and implementation of a site-specific BMP should take place before project approval, which is not the case, together with setting a clear no-net-loss strategy for unavoidable impacts and stakeholder engagement, including transboundary consultations, during BMP preparation.

The project lacks an up-to-date assessment of climate risks and resource efficiency, despite the [assurance from the World Bank](#) that the primary benefit of Rogun "is the avoided CO2 emissions of alternative generation required to meet electricity demand in the absence of the Rogun HPP. This project will contribute to regional energy security and enable the expansion of clean electricity exports to a broader region, which still depends largely on gas and coal-fired generation. Rogun HPP would contribute to a reduction in CO2 emissions in the CA region through avoided emissions from fossil fuel generation in these countries".

The Rogun ESIA mentions a CO₂-equivalent emission intensity of approximately 102 gCO₂e/kWh; however, the figure is highly questionable and likely underestimates actual emissions, making it inconsistent with the ADB's Safeguard Requirement 1 (Environment), as it requires the quantification and monitoring of greenhouse gas emissions annually following internationally recognised methodologies that would include properly calculated emissions from sedimentation and reservoir methane emissions, as well as lifetime emissions from construction, materials, transportation, etc.

Another important question is whether the completion of the Rogun HPP will accelerate or slow the decarbonisation of Central Asian energy systems.

This question is connected to the lack of properly examined alternatives “to the project’s location, design, technology, and components and their potential environmental and social impacts” in line with the ADB SPS.

The alternative scenarios presented for the Rogun Hydropower Project are outdated and incomplete in terms of reflecting current realities in the energy sector, climate adaptation priorities, and social-environmental risks. Meanwhile, the World Bank's Environmental and Social Commitment Plan (ESCP) and associated documents do not require a new comparative assessment of energy options, although new efficient technologies, market prices, and climate vulnerability data have shifted dramatically since the original feasibility studies (TEAS, 2014–2016).

Considering project-related massive displacement, ecosystem impacts, and transboundary water risks, the ADB should demonstrate why no other modern alternatives (e.g. solar, decentralised hydro, and regional energy trade) can achieve [similar outcomes with fewer harms and greater cost-effectiveness](#).

ESIA lacks a comprehensive assessment of biodiversity impacts during the project lifetime:

- It omits assessment of future conservation and restoration of the Tugai Forests of the Tigrovaya Balka Nature Reserve UNESCO World Heritage site, which already experiences negative impacts from the Vakhsh Hydropower Cascade, whose water regulation capacity will be more than doubled by the Rogun HPP Reservoir. After dam construction, the Rogun Reservoir is destined to become the sole element of the cascade responsible for major seasonal changes in downstream flows and has extended the period of future negative impacts from 30 years (before the Nurek Reservoir is filled with sediments) to 100+ years (granted by new sediment storage in the giant Rogun reservoir).
- It does not fulfil the TOR for ESIA, which is prescribed to conduct a feasibility study for the artificial release of floods downstream of the Vakhsh cascade aiming to provide sufficient environmental flows for the Tigrovaya Balka (which is both a World Heritage site and a Ramsar wetland).
- It fails to assess the impacts on endangered shovelnose sturgeons (IUCN_CR), pike asp (IUCN_EN), and many other species listed in the Tajikistan Red Data Book inhabiting the Vakhsh-AmuDarya river system.
- It uses the poor excuse of “detrimental impacts from on-going construction” to justify the lack of biodiversity surveys and postponement of biodiversity management plan preparation (BMP).

It should be noted that according to the updated [June 2025 Environmental and Social Review Summary](#) (ESRS), the ESIA will include a Cumulative Impact Assessment; however, disclosure is

still pending, and BMP will be included in the ESIA after its preparation. In addition, the ESRS starts to acknowledge that the Rogun HPP may have some adverse impacts on tangible and intangible cultural heritage and defines the environmental risks noted as “permanent inundation, loss of biodiversity, and transboundary impacts.” The significant impacts on biodiversity, aquatic ecosystems, and critical habitats remain unmitigated. The Biodiversity Management Plan and Environmental and Social Management Plans are pending, violating the ADB SR1.

2. Failure to comply with Safeguard Requirement 1 (environment) and Safeguard Requirement 2 (involuntary resettlement) regarding information disclosure and meaningful participation of the affected people.

The Rogun Hydropower Project demonstrated multiple failures in meeting the ADB Safeguard Policy Statement (2009) requirements regarding consultations, including some potentially impacted people, host communities, and downstream populations. These failures constitute non-compliance with Safeguard Requirement 2 (Involuntary Resettlement) and Safeguard Requirement 1 (Environment).

The project has problems with meaningful public participation with affected populations, including those that would be directly impacted in Tajikistan through involuntary resettlement. In many cases, communities were not informed about the full scope of displacement, compensation options, or environmental risks, violating the principle of free, prior, and informed consultation as stipulated in the SPS.

Consultations with the host and indirectly impacted communities were either insufficient or entirely lacking, breaching the SPS requirement for broad-based stakeholder engagement with all potentially affected groups. It addresses almost all consultations, including recent regional consultations, and those in Turkmenistan and Uzbekistan with CSO groups.

The situation with downstream communities in both Tajikistan and neighbouring countries is even more problematic.

The non-disclosure of the main documents (ESIA, RLFR, and others) in local languages, including Tajik, represents a clear violation of the ADB Public Communications Policy and SPS. The updated stakeholder engagement plans aim to disclose documents in Tajik and Russian but not in minority or neighbouring languages. The document acknowledges that remote communities and vulnerable groups may need tailored outreach but provides no clear timeline for enforcement.

No consultations with downstream or Indirectly Affected Communities have taken place in populations in Uzbekistan, Turkmenistan, or even the Karshi-Amu-Bukhara canal areas, despite likely impacts on water flow, agriculture, and health. A community benefit-sharing program is being designed, but no timeline, governance mechanism, or budget is yet to be disclosed.

3. Failure to meet SR2 (Involuntary Resettlement):

The project failed to meet the core ADB standards for involuntary resettlement.

- Absence of comprehensive Livelihood Restoration Plans
- Lack of updated Resettlement Action Plans (RAPs);
- Insufficient grievance redress mechanisms;

- Lack of land-to-land compensation and livelihood restoration;
- Lack of gender analysis and well-designed gender action plan and absence of sex-disaggregated indicators in the ESCP monitoring framework.

Involuntary Resettlement related issues

According to the [ADB Involuntary Resettlement Good Practice sourcebook](#) The borrower is responsible for conducting a census of displaced persons and a detailed inventory of affected assets to determine eligibility for compensation and other forms of resettlement assistance.

The revision of World Bank documents clarifies that RAP 2, covering the current resettlement phase, is still pending, while livelihood programs referenced in earlier RAP 1 and the RLRF lack measurable outcomes and follow-up evaluations. The failure to present audit or third-party verification of livelihood restoration proof for resettled people does not raise the optimism related to the ongoing RAP 2 process, according to the documentation.

Across the Rogun project documentation, the number of resettled or to-be-resettled people is inconsistent, which raises serious concerns about data reliability, transparency, and compliance with the ADB's Safeguard Policy Statement (2009), particularly Safeguard Requirement 2 (Involuntary Resettlement).

The ESIA and related World Bank documents have issues with unverified and cumulative census figures across documents, with discrepancies ranging from 42,000 to over 60,000 depending on the source and time. According to the published resettlement action plan, it is unclear how the resettlement population has been tracked nor is the methodology used to distinguish between physical and economic resettlement. However, [the answer from the World Bank](#) was more than vague: "The PAPs have been considered as those who are experiencing both physical and economic displacement. We will check again with DFZ if there are some people who do not need to relocate but whose livelihoods may suffer as a result of the dam and can adjust the RLRF to consider such a situation. It should be noted that if the dam inundates communal or individual land used for livelihoods, PAPs will be compensated with land in another location. "

During consultations, DFZ (Directorate for the Implementation of Rogun Project) staff reportedly explained the discrepancy in resettlement figures by referencing the natural population growth rate (2–3% annually). However, no methodological justification has been provided in RAPs or ESIA on how the children yet to be born over the 10–15-year resettlement horizon have been addressed in ESIA. Failure to factor in demographic growth in planning means that the project may underestimate the number of affected individuals, compromise service planning (e.g. schools, clinics, and housing), and undermine livelihood restoration and compensation calculations. This is particularly problematic in a phased resettlement process, which lacks transparency and fails to address past mistakes.

The updated [ESRS](#), published in June 2025, confirmed the resettlement of over 50,000 people, possibly up to 60,000, owing to demographic growth. This proves our concerns regarding the outdated population assumptions and the need for a proper census for proper planning of resettlement and livelihood restoration processes.

Phase 2 RAP and LRP are not yet finalised, with an expected completion date of July–August 2025, confirming earlier concerns about delayed and incomplete safeguards. The project prepares RAP 2 and LRP 2 for consultation in July and August 2025. The expected resettlement under Phase 2 is 16,919 people, with an additional 30,000 or more resettled under RAP 3-5 (up to 2032).

The resettlement action plans (RAP1 and RLRF) are neither based on a clear census, with disaggregated data on sex, age, vulnerability status, and phase) nor provide effective schemes for independent monitoring of involuntary resettlement. There is clear evidence of de facto economic displacement and disruption of social networks; however, the mitigation mechanisms are either under resourced or delayed in implementation.

Adequate compensation is also debatable. According to the ESCP and RLRF, for many displaced farmers, equivalent-quality irrigated land has not been secured, or land has been provided without long-term security of tenure, particularly in resource-scarce areas. RAP 1 and RLRF do not plan adequate support for host communities in which displaced populations are relocated, which could lead to resource competition and social tension.

The cumulative and secondary impacts, especially on vulnerable groups (e.g. women, disabled, poor, and landless), have not been fully assessed. Therefore, it is not possible to speak about adequate livelihood restoration or compensation measures for the poor, women, people with disabilities, or elderly.

As RAPs lack disaggregated data, it is challenging to establish effective monitoring and mitigation measures, including inclusive infrastructure, communication, and mobility initiatives for people with disabilities, as well as educational and vocational programs for youth. Although the scale of resettlement can create secondary displacement, urban strain, or conflict over jobs and services, the project lacks a proactive migration strategy.

Gender related issues

In terms of gender inclusiveness, the [ESIA](#) briefly mentions that women may be more vulnerable due to landlessness or dependence on informal labour, not being listed as heads of households due to traditional practices. [The Gender Action Plan](#) (GAP) focuses primarily on compliance and risk mitigation, failing to address structural barriers such as landlessness, informal labour, or discriminatory laws. While offering broad support, it does not sufficiently respond to the realities of women without land titles or formal employment, who are often excluded from compensation schemes and livelihood programmes. Overall, the GAP treats gender risks largely as operational matters (e.g. GBV protocols and staffing) and assigns implementation to institutions (DFZ, CWFA, and EPC contractors), some of which lack sufficient gender capacity.

The GAP falls short of the ADB safeguard requirements on gender, particularly in livelihood restoration, stakeholder engagement, and involuntary resettlement:

- The gender-responsive grievance redress mechanism (GRM) is weak; it emphasises compliance over survivor-centred practices, lacks trauma-informed approaches and tools to access justice, and does not offer culturally appropriate tools to reach the most marginalised women. GRM is managed internally by project structures, with no robust system for monitoring effectiveness, external oversight, or civil society participation, raising concerns about transparency. Therefore, without independent oversight, monitoring, or civil society involvement, GRM risks are ineffective, especially for landless, unregistered, disabled, or stigmatised women and girls.
- While some support has been proposed (e.g. micro-loans and training), the GAP lacks targeted, measurable, and inclusive livelihood interventions for women in informal sectors. It also fails to provide mechanisms to ensure uptake by marginalised groups or to address gender bias in recruitment and national legal barriers to women's employment.

- Mitigation actions are not supported by measurable, time-bound indicators or accountable budgeting to address the risks of GBV, SEA/SH, and the economic exclusion of women.
- Women, host communities, and indirectly affected downstream communities (e.g. in Uzbekistan and Turkmenistan) have not been meaningfully consulted. Women were underrepresented or excluded from consultations during the implementation of RAP 1. Women's participation should be ensured in a culturally appropriate way to address the issues raised in a transparent and systemic manner.

Conclusions and ADB Management future actions

Considering all the arguments mentioned earlier and the ongoing World Bank [Inspection Panel case](#), we would like to stress the following:

- The project has multiple instances of noncompliance with the 2009 safeguards, but if reviewed in light of the ESF coming into effect on 1 January 2026 it has many more noncompliance issues. Please, clarify, which safeguards framework the ADB is presently applying to this project
- The ADB cannot justify financing a project with outdated ESIA, an unknown number of fully displaced people (~45,000 so far), and zero credible river basin or transboundary planning.
- Should ADB consider continued involvement, it must demand an expanded, independently audited ESIA, enforce full RAP compliance, diminish project impacts by assessing real energy production and storage alternative solutions, and ensure inclusive consultations in local languages along the affected regions, including neighbouring countries.

If these corrections are not made promptly, the only option compatible with the ADB policy is to pause further support until a revised project aligns with the safeguard standards.

ADB should be aware that approval of funding for Rogun Dam, without the above requirements, even under ADB - World Bank FMRF and through board waiver, will undermine the bank's reputation. It would demonstrate that the FMRF reduces project accountability and efficiency, directly contradicting [its stated objectives](#).

Sincerely yours,

Manana Kochladze, CEE Bankwatch Network

International Rivers

NGO Forum on ADB

Defenders in Development campaign

Rivers without Boundaries International Coalition

Green Advocates International

Rivers without Boundaries, Mongolia

Alternative Law Collective (ALC, Pakistan)

Oyu Tolgoi Watch, Mongolia

Freedom from Debt Coalition, Philippines

Bir Duino , Kyrgyzstan

GAIA: Global Alliance for Incinerator Alternatives - Asia Pacific

Oil Workers' Rights Protection Organization Public Union,Baku,Azerbaijan,

Witness Radio - Uganda

KRuHA Indonesia (people's coalition for the right to water)

“Armenian Forests” NGO

Jamaa Resource Initiatives, Kenya

Bank Information Center, USA

Recourse, The Netherlands

Uzbek Forum for Human Rights, Uzbekistan, Germany

"Ecolur" Informational NGO, Armenia