



ШЕКАРАСЫЗ
ӨЗЕНДЕР

«Шекарасыз өзендер» Коғамдық қоры

Rivers without Boundaries Public Fund

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RIVERS WITHOUT
BOUNDARIES

Ref.# RwbK-250917-7

Date: September 17, 2025

To: Eugene Rhuggenaath
Executive Director for Constituency of Armenia, Bosnia and Herzegovina, Bulgaria, Croatia, Cyprus,
Georgia, Israel, Moldova, Montenegro, The Netherlands, North Macedonia, Romania, and Ukraine
The World Bank Group
Email: erhuggenaath@worldbank.org

CC : Sharmila Bihari
Advisor to the Executive Director
The World Bank Group
Email: sbihari@worldbank.org

Subject: Undue delay in complaint process for Rogun HPP Project

(Request for Inspection regarding Tajikistan: Sustainable Financing for Rogun Hydropower Project (P181029) and Technical Assistance for Financing Framework for Rogun Hydropower Project (P178819))

Dear Mr. Rhuggenaath,

We are writing to you to express our deep concern regarding the complaint process for the Rogun HPP Project. The decision on the request for inspection, filed with the World Bank Inspection Panel in February 2025 ([Case #175](#)), was stalled by the World Bank Board of Directors for unclear reasons in July 2025, thereby delaying the start of an urgently needed investigation.

The complaint was filed in February 2025 by citizens of Uzbekistan and Turkmenistan residing in the areas downstream of the Rogun HPP. Their names are being kept confidential due to a credible fear of retaliation from their governments and the project proponents in Tajikistan. This situation underscores the worsening human rights climate in Central Asia, which does not allow for the safe public participation of local citizens in discussions about politically sensitive infrastructure projects.

The Rivers without Boundaries Public Fund, an NGO from Kazakhstan, is acting as the official representative for the complainants in external communications, while International Rivers, Bank Information Centre, and CEE Bankwatch are providing technical advice and communication support.

The complaint centers on critical gaps and inaccuracies in the draft environmental and social instruments prepared for the Rogun HPP project, as well as multiple violations of World Bank policies on stakeholder engagement, environmental impact assessment, biodiversity, resettlement, and other areas. For decades, the construction and operation of the Rogun HPP reservoir have threatened to exacerbate the already palpable water crisis in downstream areas. However, the project proponents have refused to conduct a detailed assessment of the environmental and social impacts downstream of the Vakhsh Hydropower Cascade, despite the fact that the dam under construction is the largest element of this cascade and is capable of fundamentally altering the flow of the Lower Vakhsh and Amu Darya rivers. The livelihoods of several million people in the deserts

of Uzbekistan and Turkmenistan, as well as vital regional biodiversity—including remnant riparian forests, one of which is a World Heritage site—depend on this flow.

Furthermore, the ESIA lacks a genuine analysis of the future effectiveness of the outdated water-sharing agreements among the Aral Sea basin countries. This is despite the World Bank's own statement in 2014 that these agreements may be insufficient to ensure the safe and effective management of the Rogun HPP in a transboundary context.

No meaningful consultations with potentially affected communities in downstream countries have taken place. In Uzbekistan, "riparian consultations" were conducted 600 kilometers away from the regions that may be affected by the dam and were held in the absence of draft documents for review. In Turkmenistan, no formal consultations have been held at all, despite genuine interest expressed by local NGOs and promises from World Bank officials during a "virtual information meeting" in May 2025. The only response these NGOs received was a letter of refusal from the Rogun HPP Project Management Group, which openly and decisively refuted all their proposals.

In August 2025, the Project Management Group disclosed a "Final ESIA" on its website, which is seriously flawed and omits essential elements, including the chapter on transboundary impacts. On September 11, with only four days' advance notice for CSOs-potential participants, the Project Management Group held a "final riparian consultation" and requested that final comments be submitted by September 12. Only two riparian CSOs were able to attend. (For details, please see our letter to World Bank Management: [<https://rivers.help/pdf/RWB-250912.pdf>])

The potentially affected people in downstream countries are key stakeholders in the Rogun project and have a right to express their concerns, examine the results of comprehensive assessments of downstream impacts, and participate in properly organized consultations. They have been denied access to all of these essential processes and safeguards.

During the 2010 complaint process involving citizens of Uzbekistan ([Case #70](#)), it was established that such requesters from downstream countries are legitimate parties eligible to submit a Request for Inspection to the Inspection Panel, as required by Paragraph 9(a) of the 1999 Clarifications.

We wish to understand why exercising this right is now being blocked and why an investigation is prevented from starting. Today we were informed that the Board discussion may be delayed to November 2025 or to a later date! We see this as deliberate attempt to prevent substantive analysis of the Rogun HPP project by the Inspection Panel, while stakeholder engagement and disclosure of project materials are allowed to be conducted by project proponents with blatant violations of the World Bank standards.

We would be grateful for the opportunity to meet with you by ZOOM to discuss this urgent matter. We request your support in ensuring that the Board convenes to review the Inspection Panel's Eligibility Report as soon as possible.



Sincerely

Alexander Kolotov,

Director of Rivers without Boundaries Public Fund