



ШЕКАРАСЫЗ  
ӨЗЕНДЕР

«Шекарасыз өзендер» Коғамдық қоры

Rivers without Boundaries Public Fund

БИН 230440031982

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RIVERS WITHOUT  
BOUNDARIES

Ref.# *RwBK-251202-1*  
Date: *December, 2 2025*

**To: World Bank Group**

**Ajay Banga**, President  
**Antonella Bassani**, Vice President, Europe and Central Asia  
**Axel van Trotsenburg**, Senior Managing Director  
**Anna Bjerde**, Managing Director of Operations

## **Re: Rogun HPP Project fails to comply with Biodiversity Conservation Standards**

Dear President Banga,

We are writing to warn you about the deeply flawed Environmental and Social Impact Assessment (ESIA) prepared for the Rogun HPP Project in Central Asia. Enclosed is an [independent review](#) ("Rogun Hydro vs Biodiversity") highlighting how this assessment fails to meet the World Bank's Environmental and Social Framework (ESF), specifically ESS6 (Biodiversity).

The Rogun HPP ESIA is based on the denial of obvious downstream impacts. It also substitutes the necessary scientific assessment of biodiversity impacts in different scenarios with vague political commitments.

The exclusion of downstream biodiversity from the baseline assessment is a critical failure. The Tigrovaya Balka World Heritage property—located downstream of the Vakhsh Hydropower Cascade—has also been omitted from environmental flow design and mitigation planning. Furthermore, the ESIA cancels the feasibility study for artificial floods, which was mandated by the terms of reference as a vital measure for the World Heritage site. Without these measures, the Rogun HPP will act as a death sentence for the Tigrovaya Balka floodplain forest and its critically endangered sturgeon. The ESIA similarly dismisses the possible drying out of Ramsar wetlands in Amu-Darya Delta during the reservoir's 16-year filling period.

Upstream, the application of ESS6 is alarmingly narrow, covering less than 2% of the inundation zone. A 90-kilometer stretch of the Vakhsh River and its valley are excluded from "Natural Habitat" classification, thereby bypassing ESS6 mitigation requirements. This negligence leaves endangered species—including the Central Asian Otter, Amu Darya Trout, Turkestan Catfish, and Egyptian Vulture—without protection.

At a time when freshwater ecosystems are disappearing faster than terrestrial ones, the Rogun HPP project represents a blatant disregard for conservation. Such an approach contradicts the Kunming-Montreal Global Biodiversity Framework. The World Bank, as a key guardian of global biodiversity finance, cannot afford to be the top donor for such destruction.

We strongly recommend that the World Bank suspends financing for this project until the ESIA is overhauled to comply with the ESF and ensure no net loss of biodiversity.

Please respond to us to the following email address: alex.kolotov@gmail.com, cc: coalition@riverswithoutboundaries.org



Sincerely,

Alexander Kolotov,

Director of **Rivers without Boundaries Public Fund**

on behalf of the 25 co-signatory CSOs listed below:

**Rivers without Boundaries International Coalition**  
**CEE Bankwatch**  
**International Socio-Ecological Union**  
**Nash Vek Public Fund, Kyrgyzstan**  
**Rivers & Rights**  
**Urgewald**  
**International Rivers**  
**NGO Forum on ADB**  
**Friends of the Earth US**  
**Association of Environmental Journalists, Russia**  
**Bureau for Regional Outreach Campaigns - BROCC**  
**Latinoamérica Sustentable, Regional-Latin America**  
**Jubilee Australia Research Centre**  
**International Indigenous Fund for development and solidarity "Batani"**  
**Centre for Financial Accountability, India**  
**Oyu Tolgoi Watch**  
**ECOSERVICE S Ltd., Kazakhstan**  
**Centre for Human Rights and Development (CHRD), Mongolia**  
**Gender Action**  
**Brics Policy Center**  
**Balkanka Association Sofia, Bulgaria**  
**Recourse**  
**Eco-TIRAS, Moldova**  
**World Heritage Watch**