



Rogun Alert Coalition

November 4, 2025

To: **World Bank Group**

Ajay Banga, President

Mamta Murthi, Vice President, People Vice Presidency

Antonella Bassani, Vice President, Europe and Central Asia

Axel van Trotsenburg, Senior Managing Director

Anna Bjerde, Managing Director of Operations

Re: Urgent Concerns Regarding the Rogun HPP Resettlement Plan and Non-Compliance with Environmental and Social Standards

On behalf of the Rogun Alert Coalition, a civil society coalition dedicated to monitoring the environmental and social impacts of the Rogun Hydropower Project (HPP), we are writing to submit our attached report: ["Converting Lives into Kilowatts. Analytical Note, Comments and Recommendations on the Rogun HPP Resettlement Documentation: RAP-2 and LRP-2"](#).

Our analysis reveals that the Rogun HPP, in its current design, is on a trajectory to create a severe humanitarian crisis. The project's resettlement plan contradicts the core principles of the World Bank's Environmental and Social Framework, particularly Environmental and Social Standard 5 (ESS5) on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement. The plan fails to minimize resettlement; instead, it maximizes it, creating the largest resettlement program in modern hydropower history under conditions of deteriorating human rights and limited state capacity in Tajikistan. The selection of the highest possible dam crest will lead to the forced eviction of up to 60,000 people. This approach stands in stark opposition to the core principle of ESS5, which requires that involuntary resettlement be avoided or, if unavoidable, minimized by exploring all viable alternative project designs.

The consequences of this maximization of resettlement cannot be overstated. Our report demonstrates that we are already witnessing significant non-compliance and severe hardships in the ongoing, poorly managed resettlement process. Given the deteriorating human rights situation in the country, low transparency, and high risk of corruption in Tajikistan, there is virtually no prospect of the implementing agencies improving their performance to undertake a resettlement of this magnitude without causing immense suffering.

The specific key findings of our review point to a deeply dysfunctional process with catastrophic potential:

- **Systemic Non-Compliance and Hardship:** The on-going resettlement process is already plagued by significant non-compliance. Issues such as inadequate compensation, unsuitable resettlement sites lacking basic services like water and arable land, and a faulty grievance mechanism have created immense hardship for the thousands of people already displaced. The RAP-2 shows that its information is unreliable: even the number of households after resettlement is not known to project managers, while many key categories such as economically displaced people staying in their dwellings around reservoir or migrant workers

currently absent from home are not fully taken into account. There is little evidence to suggest that governance or implementation performance will improve as the project scales up.

- **Massive Negative Humanitarian Consequences:** The project is set to forcibly resettle at least 50,000 to 60,000 people. Based on the poor quality of existing resettlement sites and inadequate livelihood restoration programs, this will foreseeably lead to the impoverishment of tens of thousands of people. Their loss of agricultural livelihoods will create a new generation of migrant labourers forced to seek work in Russia and the Gulf Countries, dismantling communities and social structures.

Given these massive problems, the low probability of their timely resolution, and the worsening human-rights situation in Tajikistan, proceeding with the current project design is untenable. We therefore strongly recommend that the World Bank and its partners urge the Government of Tajikistan to downsize the dam to a lower crest level. A smaller reservoir could spare 30,000 or more people from the trauma of mass involuntary eviction and the prospect of becoming migrant labourers.

To achieve this, we call on the project proponents to develop a meaningful Analysis of Alternatives to genuinely explore ways to reduce resettlement. This analysis must be based on up-to-date information and feasible scenarios for Rogun HPP completion, and efficient scenarios for development of additional renewable energy facilities to satisfy demand today, not in 10-15 years from now. Success should not be measured by megawatts alone, but by minimizing resettlement numbers, improving energy security in a timely manner, and reducing negative downstream impacts on rural populations and vulnerable ecosystems. Previously we shared with the World Bank our suggestions on [approach to such analysis](#) but did not receive any substantive feedback.

Our attached report provides a comprehensive list of recommendations on resettlement. We wish to highlight the following urgent additional actions required to bring the project into a state of minimum compliance and prevent further harm:

- **Address Compensation Gaps:** Implement a proactive outreach program to provide supplementary "top-up" payments to all households resettled before July 2024 whose compensation was unfairly calculated using depreciation. For all future resettlement, valuation procedures must proactively ensure full replacement cost is met, making the Grievance Redress Mechanism (GRM) an exception, not the primary tool for correcting shortfalls.
- **Enhance Budget Justification and Transparency:** The project's resettlement budgets lack the detail and justification required for credible oversight. Budgets must be revised to include unit costs, quantities, and market-based calculations. Furthermore, the methodologies used to determine compensation rates must be publicly disclosed to demonstrate compliance with the "full replacement cost" standard.
- **Conduct a New Cost-Benefit Analysis:** The significant increase in the number of project-affected persons (PAPs) and associated costs represents a material change to the project. The resettlement budget exemplifies the wider problem that the overall project budget does not accommodate likely cost overruns. A new, publicly disclosed Cost-Benefit Analysis is required under ESS1. It must be based on current PAP numbers, realistic compensation costs, an achievable power-generation timeline (2029–2035), and credible risk scenarios.
- **Re-evaluate the Resettlement Timetable:** The current schedule to resettle the remaining ~9,000 PAPs covered by RAP-2 by the end of 2026 is entirely unrealistic and risks profound

harm. A new, phased schedule must be developed that allows for all necessary infrastructure and livelihood support to be fully in place **prior** to any physical relocation.

- **Strengthen Site Readiness Protocols and Needs Assessments:** Enforce strict, independently verified "site readiness" criteria (including operational water, power, roads, schools, and clinics) before any household is moved. Livelihood programs must be tailored to the distinct needs of physically displaced versus economically displaced households, based on detailed, disaggregated assessments.

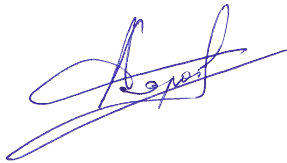
Unfortunately, the meeting on these matters on October 7, 2025, between international CSOs and the World Bank officials immediately responsible for the Rogun HPP Project left us discouraged. The officials openly recognize multiple pitfalls and malfunctions in resettlement plan and current practices, and resulting harm to the PAPs. At the same time, they see the solution as quickly approving the defunct plan and pouring money into the project. In our opinion this would not only violate the core ESF standards' requirements and risk significant harm to communities.

Given these grave concerns, we urge you and your key advisors to review the attached assessment report and the full list of recommendations included at its conclusion. The evidence of a malfunctioning resettlement process is clear, and the potential for massive, negative consequences for up to 60,000 people is undeniable. We hope that the World Bank and other financiers will seriously consider our findings and use their influence to set the Rogun HPP on a more humane and sustainable path.

We are available to discuss these matters with you further at your convenience.

Please send your response to alex.kolotov@gmail.com and project@rogun.exposed

Sincerely,



Alexander Kolotov

Rivers without Boundaries Public Fund (Kazakhstan, Central Asia)

on behalf of the Rogun Alert Coalition:

- **Central and Eastern Europe Bankwatch Network (Czech Republic)**
- **Nash Vek Public Foundation (Kyrgyzstan)**
- **Rivers & Rights (Southeast Asia)**
- **International Rivers**
- **Defenders in Development campaign**
- **CounterCurrent**
- **Inclusive Development International (IDI)**
- **Urgewald e.V.**
- **Recourse**