

Rivers without Boundaries

International Coalition

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RIVERS WITHOUT
BOUNDARIES

Ref. RwB-20260324-3
24 March 2026

To: **Anna Bjerde**
Managing Director, Operations,
World Bank
1818 H Street, NW
Washington, DC 20433

Subject: Comments on the World Bank's Response to the "Rogun Hydro vs Biodiversity" submission and pressing need to revise approaches to biodiversity in the Rogun Hydropower Plant Project

Dear Ms. Bjerde,

On behalf of Rivers without Boundaries, CEE Bankwatch, and the undersigned civil society organizations (CSOs), please find attached our detailed response to the World Bank's recent communication regarding the Rogun Hydropower Plant (HPP) Project.

We would like to express our appreciation for your letter dated February 16, 2026, and for the opportunity to engage in the online meeting held on February 17. While we value the Bank's commitment to consultation, our thorough analysis of the Bank's published reply to our "Rogun Hydro vs Biodiversity" submission has revealed significant gaps. We are concerned that the current responses rely on incomplete baseline data and omit critical aspects of the dialogue shared during our recent meetings.

The enclosed document outlines our specific concerns regarding procedural disconnects, the mischaracterization of downstream impacts on Ramsar wetlands and UNESCO World Heritage sites, and the urgent need for binding environmental flow regimes. We believe that addressing these systemic failures is essential to ensure the Project's compliance with the World Bank's Environmental and Social Framework (ESF) and to safeguard the unique biodiversity of the Vakhsh River basin.

We respectfully request a more substantive, scientifically grounded engagement moving forward. We remain committed to constructive dialogue and hope that our recommendations—particularly regarding the finalization of Consultant Terms of Reference and the integration of environmental flows into legal covenants—will be reflected in the project's next phase.

We look forward to your prompt response.

Sincerely,

Rivers without Boundaries
CEE Bankwatch
International Rivers
Biodiversity Conservation Center
Friends of the Earth US
Batani Foundation
World Heritage Watch
OT Watch
RwB Mongolia
Rivers & Rights
Nash Vek PF
Balkanka Association Bulgaria

Enclosed:

Comments on the World Bank's Response to the "Rogun Hydro vs Biodiversity" submission;

CSO Record of the February 17, 2026, Online Meeting regarding Rogun HPP

To: Anna Bjerde, Managing Director, Operations, World bank

- CC: Gallina A. Vincelette, Vice President for Operations Policy and Country Services (OPCS)
- Antonella Bassani - Vice President for Europe and Central Asia
- Charles Cormier - Regional Director, ECA Infrastructure
- Maninder Gill -Director, Environmental & Social Standards
- Sanjay Srivastava - Manager of Environment, Natural Resources and Blue Economy Global Practice
- Stephan Claude Frederic Garnier - Lead Energy Specialist
- Alexandra Bezeredi - Lead Social Development Specialist
- Maged Hamed - Lead Environmental Specialist
- Stephanie Gil - Practice Manager, ECA Energy (Infra)
- Zarina Nurmukhambetova - External Affairs Officer, ECA

Subject: Comments on the World Bank’s Response to the “Rogun Hydro vs Biodiversity” submission and pressing need to revise approaches to biodiversity in the Rogun Hydropower Plant Project

Dear Ms. Anna Bjerde,

Thank you for your letter dated February 16, 2026, and for your commitment to invite our organizations to the upcoming consultations on the Rogun Hydropower Plant (HPP) Project later this year.

We have thoroughly analyzed the World Bank’s [published response](#) to our November 2025 submission, [“Rogun Hydro vs Biodiversity: Review of the Updated Environmental and Social Impact Assessment \(ESIA\) for the Rogun Hydropower Plant Project for Compliance with the IFIs’ Biodiversity Standards.”](#) While we greatly appreciate the effort to provide a detailed reply, we must express our profound disappointment. Most of our questions were left without substantive answers, and many of our findings were dismissed based on inaccurate or incomplete information.

This written response stands in stark contrast to the constructive dialogue Civil Society Organizations (CSOs) had with World Bank Management during the February 17 online meeting regarding the Rogun HPP. Unfortunately, the essential aspects of that dialogue were omitted from the World Bank’s [official minutes](#), which were disclosed without providing CSOs an opportunity to comment on the draft minutes. We have attached [our minutes](#) of this meeting, which captures the constructive details of our discussions on biodiversity and social aspects, for your reference.

Procedural Disconnects and ESF Compliance

First, it remains unclear whether the Bank's response constitutes an official part of the ESIA consultations and if it will be documented in the response matrices accompanying the "final" ESIA. In fall 2025, Mr. Cormier informed us that the Rogun Project Management Group (PMG) declined to include our comments in the official ESIA documentation, citing that our reports were sent to the WB team rather than to them. This is factually incorrect; many CSOs, including ours, consistently sent/copied comments to the Rogun PMG. Meanwhile the World Bank developed a [public-relations website](#) which is not accessible from the usual [project web-page](#) and there published all our inquiries and WB responses. While we appreciate adding publicity to highlight our work and disclosure of additional documents, we are deeply concerned, that it is

done as a substitute for incorporating detailed response matrices to CSO comments into the core ESIA documentation.

Contrary to the statement in the WB's response, the "final" ESIA re-disclosed on October 8, 2025, does not contain matrices of written CSO comments received during 2024–2025 and fails to take them into consideration. Although the WB committed in October 2025 to ensure all our responses would be reflected in the documentation, this has not occurred, despite over 100 days having elapsed since the closure of the ESIA consultations. Given this impasse, we sent all subsequent communication addressed to PMG not just cc'ing them. Thus, our review "Rogun HPP vs. Biodiversity" was sent to PMG on November 28, 2025, prior to the consultation deadline.

While your response was cleared by five senior World Bank officials, it lacks any indication that the PMG participated in developing or verifying the answers. We respectfully request an end to this perpetual lack of procedural coordination. ALL detailed response matrices addressing ALL our comments must be timely incorporated into the core Project documentation. In our view, the current omissions constitute a major breach of the Environmental and Social Framework (ESF), specifically ESS1 and ESS10.

Mischaracterization of Impacts and Cumulative Assessments

We are highly alarmed that the WB response begins with the misleading suggestion that many of our concerns relate to the existing Vakhsh hydropower cascade and cannot be attributed to the Rogun HPP. Our submission detailed exactly how our arguments relate specifically to Rogun's potential impacts, which the ESIA downplays based on political judgments rather than science or regional experience. For example, compared to the current usage, up to 1.2 billion cubic meters per year will be used in surplus for the filling up of Rogun reservoir. All this volume of water will not flow downstream to Ramsar wetlands in Tajikistan and Uzbekistan, potentially causing ecosystem degradation, that have not been assessed in the ESIA.

The WB response fails to address these scientific arguments, relying instead on highlighting Tajikistan's political commitments not to harm downstream neighbors—commitments that have little bearing on practical biodiversity conservation. Legal covenants vaguely require that the "Recipient shall comply at all times with the Regional Water Sharing Arrangements," yet they provide zero specific numerical limits for flow alteration or considerations for biodiversity. As the Project will extend the service life of the Vakhsh Hydropower Cascade, it is an indisputable fact that Rogun, as the largest dam of the cascade, will dictate operations and cement current negative downstream impacts of hydropower for up to another century. Those negative impacts are neglected in both the ESIA and the WB response. The World Bank claims that the Project will "*help with flood protection for the entire cascade*" which suggests further downstream flow changes, but the ESIA fails to acknowledge that while natural flooding might be bad for the cascade, periodic floods are critically necessary to sustain the floodplain forest of the UNESCO World Heritage site.

Similarly, we note the WB response relies on the Transboundary Cumulative Impact Assessment (TCIA) and its pre-set conclusion that Rogun will cause no significant cumulative effects. We detailed the substantial flaws of the TCIA in a [separate submission](#) on November 29, 2025, and have now been waiting over 100 days for a response to that document.

Misuse of the "Living Document" Concept and Geographic Scope

We welcome the promise to follow the 2018 ESF and focus on "continuous monitoring and implementation of biodiversity conservation." However, we firmly object to the tendency to use this as an excuse to accept a substandard and incomplete ESIA at the time of disbursement. Relying on a "living document" is unacceptable when it clearly violates ESF standards.

Reflecting the flaws of the ESIA, the WB response makes the highly concerning assertion that "main aquatic impacts will be in the 15-km stretch of the Vakhsh river between the Rogun and Nurek HPPs." This indicates a fundamental misunderstanding of our arguments regarding the affected biodiversity of both upstream and downstream reaches.

The WB response reiterates that due to presence of the dam cascade the Vakhsh river is "neither a pristine nor a free-flowing river" and is "not a critical habitat," thereby dismissing our key arguments and misrepresenting our geographic focus. While the middle stretch is fragmented, we extensively detailed that the Upper Vakhsh stretch (above the Nurek Reservoir) and its key undammed tributaries (e.g., Surkhob and Hignob) represent a large river system with unaltered natural processes and predominantly native biodiversity—facts confirmed by the project's own baseline data. This riverine/aquatic habitat, stretching more than 100 kilometres in the Project's Area of Influence (AoI), qualifies as "natural" (if not "critical") under ESS6. The ESIA entirely fails to identify it as such or include it in the mitigation hierarchy. Currently, only 2% of terrestrial features in the inundation area are recognized as "natural habitat" under the "No Net Loss" framework (with cliffs, grasslands and other crucial features completely omitted), while natural aquatic habitats are excluded.

Furthermore, the Vakhsh River downstream of the cascade is protected within the Tigrovaya Balka World Heritage property and must be recognized as "critical habitat." The ESIA conceals its World Heritage status and exempts the area from baseline assessment. Both the upper and lower stretches face practical destruction due to Rogun, yet these impacts are not properly assessed.

Monitoring vs. Baseline Deficiencies

The preamble of the WB response states that data gathered through monitoring as part of the ESMP update and the BMP will help "identify if any additional areas within the AoI could qualify as Natural Habitat... and then inform any necessary modifications to the BMP and No Net Loss Framework (NNLF)." However, this is immediately undermined by referencing a table of "monitoring measures" focused merely on translocated plants and bats, invasive plant searches, and reservoir filling fisheries surveys. These actions are useless for identifying natural habitats or developing core mitigation measures. Upgrading a baseline study and revising fundamental ESIA flaws requires entirely different steps, which we outlined in our submission. Relabeling necessary comprehensive ESIA corrections as "monitoring measures" avoids institutional responsibility for accepting a flawed ESIA at the financing stage. Besides, our experience with other projects shows, that MDBs have almost no leverage to improve a project once it is financed and relying on monitoring measures will not allow making any significant improvements.

Environmental Flows and the World Heritage Site

Our submission noted that a feasibility study for an environmental flow (artificial floods) regime for the Lower Vakhsh river (Tigrovaya Balka WH site) was included in the ESIA Terms of Reference but was dropped as "too complicated" with the WB's silent approval. Answer #15 states that "Operation Rules for the Vakhsh cascade will be developed during project implementation" and will take environmental flows into account.

This contradicts the respective Legal Covenant (Schedule 2, Section IV.B.3), which prescribes no specific environmental flow requirements and envisions approval of the Reservoir Management Rules only *after* Rogun is built and filled (around 2040 when the financiers will have minimal influence on the borrower). Without binding requirements now, it is highly likely this vital task will again be dismissed as "too complicated". At the same time, delay till 2040 is leaving the Tigrovaya Balka floodplains without mitigation for the next 15 years. Furthermore, as noted in the ESIA ToR, a complex hydro-ecological feasibility study is required *before* water engineers can draft operation rules; otherwise, they will have no data to "take into account." We

are also alarmed that Mr. Hamed's promise during the February 17 meeting to address this issue in the ESIA/BMP review was entirely omitted from the Bank's minutes.

Denial of Rare Flora and Fauna

The WB response repeatedly denies the presence of any rare species, contradicting established facts and the project's own baseline data.

- Regarding our requests (paragraphs #1 and 7) for mitigation using examples of the Amu Darya trout (*Salmo oxianus*), Turkestan catfish (*Glyptosternon oschanini*), Central Asian Eurasian Otter (*Lutra Lutra seistanica*), and Egyptian Vulture (*Neophron percnopterus*), the WB replied that the ESIA "did not identify any areas within the AoI showing evidence of critical habitats or presence of any threatened, rare or endangered species." Yet, the presence of these four species (and others) is clearly documented in the baseline assessment, BMP, and other parts of the ESIA.
- In Answer #37, the WB likely misidentifies the sturgeon species in question. Lower Vakhsh (Tigrovaya Balka) is a well known key habitat for the critically endangered Amudarya Shovelnose sturgeon (*Pseudoscaphirhynchus kaufmanni*), whereas the presence of the Dwarf (Lesser) Amudarya Shovelnose sturgeon (*Pseudoscaphirhynchus hermanni*) in recent decades has been confirmed only for Amudarya midflow.
- The fate of the Aral Salmon (*Salmo aralensis*)—whose last known habitat was the Nurek Reservoir and the Vakhsh river upstream of it (the exact Rogun site)—has not been clarified in the ESIA. If extinct, the reasons must be identified.
- Answers #14 and #20 insist the ESIA found no evidence of "shorter fish migration." However, this was never studied in the baseline, despite the confirmed presence of migratory species such as the Amudarya trout and Snow-trout (*Schizothorax sp.*).

Methodological Critique of the WB Response

The mechanical process used to generate the WB response hindered productive dialogue. Our cohesive submission was arbitrarily fragmented into 121 separate paragraphs, often separating logically connected points. Of the 121 answers provided:

- Only 8–9% (10 entries) answered in substance with explanation/analysis.
- 10 answers deferred to future planned improvements (mostly "monitoring").
- 80% simply referenced the existing ESIA/CIA/Annexes/ESMP/BMP—the very documents whose specific flaws we were highlighting.
- At least 42 answers directly denied or refuted our findings based on inaccurate premises (including 7 that simply cross-referenced other refuting answers).

The most common, fundamentally flawed rationales for refuting our recommended actions included:

- Flow regime is unchanged due to political commitments/legal covenants, hence no downstream/Amu Darya/Ramsar/Tigrovaya impacts (11 answers).
- Pre-existing cascade causes all observed impacts and is the accepted baseline (5 answers).
- Existing ESIA/CIA/Annexes are already sufficient; no new assessment is needed (7 answers).
- No evidence in the ESIA of claimed species/impacts, despite baseline data (5 answers).
- Future monitoring/adaptive management/ESMP will handle the issue (7 answers).

Conclusion

A check-box compliance exercise that mechanically refutes stakeholder input is not what CSOs expect from the World Bank and the Project Management Group (PMG). We urgently request a dialogue to establish a more effective mechanism for submitting our observations—one that incentivizes World Bank officials and project sponsors to respond in substance, rectify flawed baseline data, and implement binding mitigation measures.

To address the outstanding biodiversity gaps in the Rogun HPP Project, we urgently recommend the following steps:

Finalization of the Consultant Terms of Reference (ToR): As the procurement sections of the Rogun HPP Project websites currently lack any announcements regarding a tender for a new consulting firm on biodiversity management, we assume the ToR has not yet been finalized. We strongly urge the PMG and the World Bank to incorporate tasks into this ToR that correspond to all key recommendations detailed in our "*Rogun HPP vs. Biodiversity*" submission. Additionally, we request an estimated timeline for when our first meeting with this newly hired consultant might take place.

Clarification of Consultant Scope and Timeline: We seek clarification on the overall scope and intended timeline of this consultant's work. During the February 17 meeting, we were informed that the consultant would be assigned other ESIA-related tasks beyond biodiversity. We are deeply concerned that a multi-tasking approach will once again marginalize and jeopardize crucial biodiversity issues, as has occurred in previous iterations.

Planning of Environmental Flows: We request that the planning of environmental flows downstream of the Vakhsh cascade—specifically including the previously planned "feasibility study for artificial floods"—be explicitly integrated into this "biodiversity management" ToR or pursued as an urgent, stand-alone task within the broader scope of the Rogun HPP ESIA.

Protection of the Tigrovaya Balka World Heritage Property: We request that the ToR mandate an assessment and mitigation plan for potential impacts (including cumulative impacts) on the Tigrovaya Balka World Heritage property. This must be evaluated in light of the "net gain" requirements applicable to "critical habitats" under the ESF, as well as the UNESCO Guidance Toolkit for Environmental Impact Assessments in a World Heritage context. Furthermore, we recommend that Tajikistan share the draft assessment plan with UNESCO and the IUCN to ensure full alignment with World Heritage Convention procedures.

Integration into Operational Rules and Covenants: We recommend that the development and execution of a sufficient environmental flow regime, as a core component of the Operational Rules for the Vakhsh Cascade, be explicitly included in an updated version of the Project's legal covenants prior to any finalization of Phase II financing.

ESF Compliance Prior to Phase II Financing: Finally, we formally request that all ESIA documentation and management plans be brought into strict compliance with ESF requirements before any Phase II financing is considered. The Environmental and Social Commitment Plan (ESCP) and legal covenants must be adjusted to support the implementation of the newly developed biodiversity mitigation plans. Without these prerequisites, financiers will have little leverage to enforce further biodiversity safeguards during project implementation.

We look forward to your prompt response and to a more substantive, scientifically grounded engagement moving forward.

Comments prepared by Rivers without Boundaries and CEE Bankwatch and endorsed by 11 CSOs.

DRAFT: We kindly ask responsible WB officials to look at CSOs version of minutes and correct inaccuracies in interpretation of WB position/wording. We believe that verifying of minutes of a dialogue by all participating sides can greatly improve mutual understanding. We hope this could be done within two weeks, so that we can display our version on a website

Link to the draft: https://docs.google.com/document/d/1oLDoBeANHBxeKwN3eUlunM_I13-Lx3lp/edit?usp=sharing&oid=107903846952942455611&rtpof=true&sd=true

Meeting Notes as recorded by CSOs: World Bank – Civil Society Organization (CSO) Update Call on Rogun Hydropower Project. Date: 17.02.2026

Meeting notes produced by the World Bank (disclosed 2026.03.13) found here: [World Bank – CSO meeting on the Environmental & Social Aspects of Rogun HPP – Summary](#)

Attendees:

World Bank (WB) Team:

- Charles Cormier - Regional Director, ECA Infrastructure
- Maninder Gill -Director, Environmental & Social Standards
- Sanjay Srivastava - Manager of Environment, Natural Resources and Blue Economy Global Practice
- Stephan Claude Frederic Garnier - Lead Energy Specialist
- Alexandra Bezeredi - Lead Social Development Specialist
- Maged Hamed - Lead Environmental Specialist
- Stephanie Gil - Practice Manager, ECA Energy (Infra)
- Nicole Frost Manager - External Affairs, ECA
- Amy Stilwell (moderator) - Senior External Affairs Officer
- Zarina Nurmukhambetova - External Affairs Officer, ECA
- Dilafruz Zoirova - External Affairs Officer, Dushanbe/ECA

Civil Society Organizations:

- Eugene Simonov, Alexander Kolotov, Rivers without Boundaries.
 - Mark Fodor: Coalition for Human Rights in Development.
 - Chinara Aitbayeva, Nash Vek Foundation, Kyrgyzstan
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1. Project Status Update

Charles Cormier (WB) greeted participants and apologized that 73-page response on Biodiversity and 51-page response on Resettlement commitments were sent to CSOs only in last 24 hours....

[Rogun PMG Reply to CSOs on Resettlement](#) February 17, 2026 (not publicly disclosed)

[World Bank response to Rivers without Boundaries Public Fund and CEE Bankwatch](#) February 16, 2026

He provided an overview of the project status:

- Phase 1 Approval: Approved by the Board in December 2024.
- Effectiveness: The project became effective on December 22, 2024. This was delayed as the government needed time to meet Conditions of.

- Disbursement: A first disbursement of ~\$57 million has occurred.
 - Current Status: The project is effective for goods and services but not for civil works..
 - Lot 2 (Main Dam Construction):
 - Financed by the Government of Tajikistan (not IFIs), but the contract must be retrofitted to meet WB Environmental and Social Framework (ESF) standards.
 - An audit found gaps; an Environmental and Social Action Plan (ESAP???) was created.*(unclear what was really stated)*
 - Negotiations are ongoing between the government and the contractor (Webuild) to amend the contract to include legally binding ESF obligations.
 - Supervision: WB has ramped up supervision, including a senior hydropower/dam safety specialist based in Dushanbe and increased social safeguards staff on the ground. WB visits to Tajikistan happen every month to deal with variety of issues.
 - *In late 2025 WB and Tajikistan undertook an “audit of gaps” - Now are preparing a plan to fill gaps.*
 - Phase 2 Preparation:
 - Target Board Date: End of June (tentative).
 - Amount: \$300 Million.
 - Prerequisites: Satisfactory performance in Phase 1 (according to ISR), compliance with ESCP including operational health and dam safety requirements, and the successful amendment of the Lot 2 contract to incorporate ESF requirements.
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2. Social and Resettlement Update

Alex Bezeredi (WB) provided an update on resettlement activities:

- Progress: Over 8,000 people resettled; 2,000 nearing completion; ~6,000–7,000 remaining. The timeline will extend beyond the current calendar year.
- Financing: WB is providing financing for compensation (homes/structures) and training stipends to speed up livelihood restoration.
- Resettlement Action Plan (RAP) Update:
 - The RAP is being updated and will (hopefully) reflect CSO feedback (updated RAP documentation will include more detail on valuation methodology, grievance mechanisms, environmental due diligence at resettlement sites, and budget granularity, clarifying that budget updates will reflect exchange rate fluctuations and cost adjustments).
 - Compensation financing and training stipends are intended to accelerate implementation and support livelihood restoration
 - Communities left around reservoir seek to establish land/resource management schemes to protect resources and engage in tourism and agriculture.
 - Technical Household Passport: A new passport system implemented post-July 1, 2024, ensures no depreciation is deducted from asset valuation.
 - Livelihoods: Discussions focus on rural vs. urban preferences. Some resettled PAPs (Project Affected People) want land for animal husbandry, while others prefer proximity to towns/services.

Arguing that compensation money is normally sufficient to build a house Here AB also raised an example when elder PAPs who build spacious house while all their children move away, so a single couple left in 4-bedroom apartment.

Labor: Monitoring of migrant labor issues is ongoing (CSOs doubted their inclusion in resettlement scheme). PAPs actively rely on employment in house-building for other PAP and

temporary work at Rogun HPP construction site, both do not provide long-term employment prospects..

3. Environmental Update

Maged Hamed (WB) addressed environmental due diligence:

- ESIA Status: The Environmental and Social Impact Assessment (ESIA) is a "living document." Quality improved from the 2024 draft to the 2025 draft, but substantial gaps remain.
 - New Consulting Firm: The Project Management Group (PMG) is hiring a new consulting firm (Terms of Reference being drafted) to:
 - Strengthen baseline data. (it will also address many many questions raised by CSOs).
 - Conduct additional field surveys (flora, fauna) and search for information
 - Address gaps in the Biodiversity Management Plan (BMP) and "No Net Loss" framework. Extent of natural habitats (in the inundation area?) will/may be reconsidered.
 - The consultant will be tasked with reconsidering the status of the Vakhsh River segments. (*the intended scope not fully clear, hopefully includes segments downstream from Vakhsh cascade and upstream of the Rogun HPP*)
 - Fisheries management and fish biodiversity is likely important focus
 - Revisiting the Watershed Management Plan (erosion control vs. socio-economic benefits).
 - The Transboundary Cumulative Impact Assessment will be also revised with specific focus on areas downstream of Nurek, including Tigrovaya Balka (World Heritage Site) and the potential need for "artificial floods" to maintain the ecosystem. (*The Bank reiterated that water flow regulation is not expected to cause appreciable harm to downstream riparian countries based on current assessments.*)
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4. Q&A and Discussion

A. Conditions for Phase 2 & Contract Retrofitting

- Eugene (RwB): Asked for clarification on the conditions required to start Phase 2, implying that 2026 is way too early to approve funds given that financing of Phase I just started in 2026.
- Charles (WB):
 - Phase 1 implementation must be rated "Moderately Satisfactory" or higher (currently meeting this).
 - Critical Condition: The Lot 2 contract (dam construction) must be amended to legally bind the contractor to WB ESF standards (OHS, Grievance Redress Mechanism, Dam Safety).
 - Contracts for Lot 3 (Left Bank) and Lot 1 (Turbines) were previously retrofitted; Lot 2 is the remaining major hurdle.

B. Resettlement Compensation & Timeline

- Eugene (RwB): Raised concerns that the money allocated per person for resettlement appears insufficient for livelihood restoration. Noted that RAP 2 timeline has extended significantly (potentially to 2028) to resettle remaining 9000 people. Given 40 thousand more

people to be displaced by or 2032 may this is unrealistic plan potentially be leading to forced displacement and relocating people to temporary shelters?

- Alexandra Bezeredi/AB (WB):
 - Inflation/Currency: The budget is being updated in *Somonis*. Exchange rate fluctuations and inflation on construction materials (timber/metal) impacted buying power. (AB recognized that RAP-1 compensations were higher than today if you consider depreciation of somoni and inflated prices for materials???)
 - Self-Build vs. Market: PAPs often “prefer” to build their own homes (it is cheaper than buying market value). WB is monitoring to ensure homes are of good quality. (AB said she believes that compensation reaches 25-30 thousand USD per house(hold))
 - Timeline: Acknowledged the need for resettlement timeline extension beyond 2032.

C. Monitoring, Reprisals, and "Safe Space"

- Mark Fodor (CHRD):
 - Access: Can WB monitors visit communities *without* government presence?
 - Fear: PAPs may complain about logistics (money, bricks) but are too afraid to criticize the *project* and forced resettlement per se or the government due to fear of reprisals.
 - CSO Access: Independent CSOs and Human Rights defenders cannot safely enter the area or monitor the project. It is effectively a "no-go zone" for civil society.
- Alexandra Bezeredi (WB):
 - WB staff have conducted occasional unannounced visits and held focus groups without government officials present (“*The Bank confirmed that focus group discussions and unannounced visits have been conducted, including instances where staff visited communities without prior government notification*”.)
 - PAPs have vocalized complaints about compensation/logistics, suggesting some level of openness, though acknowledged they do not speak against the dam itself.
- Mark (CHRD): Reiterated that complaints about "logistics" are safe; complaints about rights violations or the dam's existence are dangerous. Commented on Alexandra Bezeredi's information that the Bank and the Tajik government have said that civil society is more than welcome to visit and talk to the people. Under the current conditions this would be near impossible: while there are issues that people are able to raise (compensation, livelihood issues), criticism of Rogun HPP Project itself is taboo and dangerous. Suggested Independent Third-Party Monitoring (verification) that is not the government or the Bank. A third party CSO monitor would likely be asking questions about issues that could potentially be perceived as an obstacle for the project to go on as planned, and would therefore be topics that are off-limits. If certain conditions are met - we can connect the bank to experts on civic space who could discuss with you what those conditions may be, ie. how independent third party CSOs can monitor the situation without putting anyone at risk - we should be able to find third party monitors who would be able to visit.

Charles Cormier (WB): Welcomed suggestion to be connected. Acknowledged the difficulty. The government has hired a third-party NGO for livelihood monitoring ([here is the TOR](#)). WB is open to suggestions on how international CSOs could join missions safely, though protocol usually requires government awareness.

D. Biodiversity & Tigrovaya Balka

Eugene (RWB):

- Impact Duration: The impact on Tigrovaya Balka is extended in time (Rogun HPP construction results in additional 60 years of dam cascade operation is effectively permanent damage). So whether or not we agree on potential changing of flow downstream of Nurek,

the duration of extreme negative impacts will be extended manyfold by Rogun HPP construction and the seasonal flow regulation casing it will be done by the Rogun Dam.

- Artificial Floods: Noted that feasibility studies to release artificial floods were in the original TORs in 2010-2023 but were refuted by the 2025 ESIA (see CH/NNL sections) and explanation of that given in today's WB response is counterfactual. The previous consultants since 2010 always denied that Rogun HPP could impact the flooding regime of Tigrovaya Balka (attributing all negative impacts solely to Nurek dam). The Bank's original rationale for recognizing the need for artificial floods was to mitigate/compensate for other adverse impacts (e.g. reservoir formation), which were then drastically downplayed and unaccounted for in the ESIA.
- Values: Argued that the project threatens the highest biodiversity value in the region and including this in mitigation hierarchy is the top conservation priority for any responsible financier whether or not we agree on rather abstract and legalistic responsibility questions.
- We got World Bank's 73 page answer today and brief analysis shows that you avoided answering in substance more than 70% of specific questions. We suggest that the contents of the TOR for the new consultant have to be subject to public discussion, or at least want to see and discuss it with you as early as possible.
- We also will write you a response to your matrices with reflections on adequacy of your comments and we hope that upcoming response on our TCIA analysis will not be so evasive. If you do not have data to answer some questions - please just acknowledge that instead of referring us back to the ESIA/TCIA, which flaws we analyse in our arguments.

Maged Hamed (WB):

- Baseline Data: Admitted baseline data is not robust enough yet. The new consultant is specifically tasked to fix this.
- Artificial Floods: WB is applying a "precautionary approach" and forcing a re-evaluation of this to see if artificial floods are required for mitigation downstream. We will study "temporal" aspect you refer to.
- No Net Loss: This framework is being updated to ensure compliance with WB Standard 6 (Biodiversity).
- The problem with biodiversity part is that neither external consultant nor experts in the region gathered by Tajik Government have been able to reliably develop proper biodiversity assessment and management plan (*this part was not fully clear, likely, Maged was hinting that internal government-trusted experts were viewed as more capable than external consultants unfamiliar with the region, but the end result was still substandard*).
- Actually, new ESIA consultant will be tasked to fill variety of gaps in the ESIA, not only biodiversity.
- Project management still is working on TCIA response, we will try to highlight where we lack information.
- Instead of further writing 70-page letters, we suggest that CSOs meet with new ESIA consultants at early stages of their contract.

(NB: The WB summary of this meeting omits many of aspects discussed above, including artificial floods. All it says: The Bank stated that additional biodiversity expertise will be mobilized through a new consulting firm to update the Biodiversity Management Plan, review natural habitat classifications (including Vakhsh River segments), and reconsider watershed management needs. CIA and BMP consultations are to be held once the new consultant is onboarded.)

Charles Cormier (WB): Also backed Maged's invitation to meet.

Suggested to reconvene in approximately 3 to 4 months.

4. WB- action timeline (according to information received):

1. Response to TCIA critique by RwB – will be sent to CSOs “very soon” as PMG finalizes it. *(A month passed, but the response is yet to arrive)*
2. Consulting Firm TOR: WB to finalize the Terms of Reference for the new Environmental/Social consulting firm ASAP and invite CSO experts to meet with the consultant team “in due course”. *(ToR for this consultant is unclear)*
3. RAP-2 Update: WB to finalize the updated Resettlement Action Plan-2 to “correct figures”. *(Many details on that update found in the PMG response to Resettlement critique)*
4. CSO Engagement: WB invited CSOs to propose specific monitoring mechanisms or potentially join missions (logistics/safety permitting) to resettlement areas.
5. Lot 2 Amendment: WB to continue monitoring the negotiations between the Government of Tajikistan and the contractor regarding the retrofitting of the dam construction contract. This is a precondition for starting disbursement for civil works.
6. WB is eager to start finalizing Phase II financing arrangements as early as June 2026 *(Phase I ends in 2029)*
7. Next quarterly Meeting with CSOs in approximately 3 to 4 months (i.e. June-July).

Summary of Action Points as presented in the [WB minutes on the meeting](#):

- *The World Bank to follow up regarding the independent RAP monitor’s ability to communicate without government’s presence and visit communities unannounced.*
- *CSOs to connect World Bank with experts on civic space in Tajikistan to discuss independent monitoring under current conditions.*
- *PMG to respond to latest CSO letter regarding transboundary cumulative impacts. World Bank to support.*
- *The World Bank to discuss with PMG organizing a technical discussion with CSOs and the consulting firm hired to strengthen biodiversity management aspects*