

## **Overview of Key Issues and Proposed Solutions in Response to the Rivers without Boundaries Public Fund**

This matrix has been compiled in response to the concerns and questions raised by the **Rivers without Boundaries Public Fund** during the **Public Consultation held in Dushanbe on September 11, 2025** and subsequently submitted in writing through an official letter sent on **September 12, 2025** (*Ref: RWB-250912*).

The concerns and comments relate to the **transparency, adequacy, and public disclosure** of key environmental and social documentation associated with the **Rogun Hydropower Project (HPP)**. Specifically, the following documents were reviewed:

- **Environmental and Social Impact Assessment (ESIA)**
- **Resettlement Action Plan – Phase 2 (RAP-2)**
- **Livelihood Restoration Plan – Phase 2 (LRP-2)**

This matrix is intended to:

- Summarize the primary issues raised by Rivers without Boundaries
- Present the corresponding responses, clarifications, or proposed solutions
- Facilitate constructive dialogue between stakeholders, including civil society, project developers, and relevant government bodies

	Subject of the comment	Comment formulated by a stakeholder	Content of the answer
1	<b><i>Improper and Untimely Notification</i></b>	<p>a) The PMG announced the publication of the updated ESIA on August 22, 2025, by posting the information <b>only</b> in the "Tenders" section of its website.</p> <p>b) Key civil society organizations (CSOs) that had previously been actively involved in project discussions were not directly notified.</p> <p>c) Furthermore, at the time of publication, some documents were not available in Russian and Tajik.</p> <p>d) The announcement of the "final consultations with riparian countries" on September 11 was sent out on a weekend (Saturday, September 6), leaving stakeholders insufficient time to prepare.</p> <p>e) Despite the absence of the vast majority of civil society representatives (only two NGOs from outside Tajikistan were present), the PMG refused to acknowledge the rushed and illegitimate nature of the consultations.</p>	<p>The Project Management Group (PMG) acknowledges the concerns raised regarding the availability and visibility of the updated Environmental and Social Impact Assessment (ESIA), which was published on August 9, 2025. We would like to offer the following clarification and context:</p> <p><u>-Publication and Notification</u></p> <p>a) The announcement on the updated ESIA was published on the PMG's official website to ensure transparent and unrestricted public access. It was placed in the "News" section. However, due to unknown technical issues with the website (a feature or a bug), the text appeared under the "Tenders" section. Despite this fact, this announcement <b>also was and still is available on the main page</b> of the PMG's website. The PMG recognizes the importance of clear and accessible communication and is currently in the process of developing a new, modern and more user-friendly website to ensure the consistent and reliable dissemination of project-related information.</p> <p>b) This statement is incorrect because all key civil society organizations (CSOs) that had previously been actively involved in project discussions were directly notified by email on September 6, 2025. Notifications were also sent to those organizations that did not participate in previous discussions.</p> <p><u>-Language Accessibility</u></p> <p>c) The PMG acknowledges that not all project documents were immediately available in Russian and Tajik at the time of their initial publication. The working language of the consultancy team and the draft documentation is English, which resulted in a short delay in the preparation of translated versions. However, Volume 1 of the ESIA in Russian and Tajik were published on August 9, i.e. simultaneously with the English version. And by August 18 for Russian version and</p>

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			<p>by August 25 for Tajik version, the remaining parts of the ESIA were published accordingly.</p> <p>d) Yes, the PMG notified concerned CSOs as stated above (1b).</p> <p>e) The PMG is confident that the consultations were sufficiently representative, and that the invited stakeholders had sufficient time to decide whether to participate in the consultations or not.</p> <p>We would like also to clarify the following:</p> <p><u>-Timing of Consultation Announcement</u>  Appropriate announcements of a series of consultations were published in national and district newspapers, as well as on the websites of the PMG and the Directorate for Flooding Zone in the period from August 22 to 26, 2025. The consultation with local stakeholders and CSOs outside Tajikistan was held on September 11, 2025. Invitations for CSOs outside Tajikistan to participate were circulated by email on Saturday, September 6, 2025. Your feedback concerning the latter is noted. Organizing consultations is a significant undertaking and the PMG is committed to improving this process to ensure inclusivity and timely participation by all relevant parties.</p> <p><u>-Stakeholder Participation and Representation</u>  In addition to the participation of two foreign NGOs, the consultation was attended by a diverse group of stakeholders, including representatives from CSOs, IFIs, national government agencies, academic and research institutions, and official delegations from riparian countries.</p>
2	<b>Uncertain Status of Disclosed</b>	a) Typically, the posting of project documents on the World Bank's official project page signifies their compliance	a) As previously noted, the PMG—as the project proponent and owner of the relevant documentation—initially disclosed the documents on its own website in accordance with its applicable procedures. This disclosure occurred before their

	<b>Subject of the comment</b>	<b>Comment formulated by a stakeholder</b>	<b>Content of the answer</b>
	<b>Information and Procedural Inconsistencies</b>	with the Bank's disclosure requirements. However, as of September 10, 2025, only the Resettlement Action Plan and the Livelihood Restoration Plan were available on the Bank's website; the core ESIA documents were missing. This creates confusion, reminiscent of late 2023 when the PMG prematurely released substandard documentation that was finalized and re-published only a month later. We urge the World Bank to clarify whether the current disclosure on the PMG website constitutes the official start of the consultation period	publication on the World Bank's official project page. The PMG has disclosed the updated ESIA for consultation purposes, of which you were notified by email. Subsequently, on October 10, 2025, the World Bank also disclosed the ESIA documentation on its website, thereby fulfilling its own disclosure requirements.
3	<b>Unacceptably Short Comment Period.</b>	<p>a) The deadline for comments was set for September 12, 2025—the next day after the consultation. This is a direct violation of the guidelines of all financing institutions involved, which require a reasonable period for document analysis.</p> <p>b) Despite requests from Tajik and international NGOs, the PMG refused to extend the deadline.</p> <p>c) The consultation moderator stated that foreign organizations were obligated to monitor all project-related websites themselves. We demand an extension of the comment period by at least 30 days from the date of proper consultations on</p>	<p>a) The ESIA documents were published on August 9 — one month before the consultations in Dushanbe (11.09.2025) — which, provides sufficient time to prepare comments and questions on the environmental and social instruments. Nevertheless, we had extended this deadline to the end of November 2025.</p> <p>b) The PMG did not refuse to extend the deadline. The exact answer during the meeting was that, the project instruments are "living" documents, and all constructive comments received even after the deadline will be reviewed and, if necessary, incorporated into updated versions of the documents.</p> <p>c) This is incorrect. The moderator said that it was evident that your organization monitored the PMG website.</p>

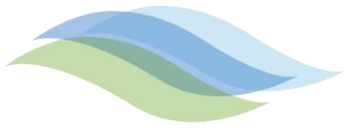
	<b>Subject of the comment</b>	<b>Comment formulated by a stakeholder</b>	<b>Content of the answer</b>
		each document, after they are brought into compliance with World Bank standards.	
4	<b>Poorly Designed and Inadequate Consultation Format</b>	<p>a) The updated project documentation contains over 2,000 pages of complex technical information. Holding a single event with a one-hour Q&amp;A session to discuss all these documents is entirely insufficient and reduces the very idea of constructive consultation to a mere formality.</p> <p>b) This also contradicts previous assurances from World Bank representatives that separate, in-depth consultations would be held for each key document (ESIA, RAP, Cumulative Impact Assessment).</p> <p>c) During the hearing, Tajik NGOs also requested separate consultations on resettlement issues.</p>	<p>a) As noted above, the disclosed documents are considered “living” documents. This means that all constructive feedback received—even after the official consultation deadline—will be reviewed and, where appropriate, reflected in updated versions of the documents. Additionally, all questions and comments submitted by stakeholders will receive a response to ensure transparency and continued engagement.</p> <p>b) PMG and DFZ are willing to organize detailed consultations on the environmental and social documents. We will discuss how to do this in the Rogun area and announce such consultations to stakeholders.</p> <p>c) This statement is incorrect. Representatives of Tajik NGOs requested a meeting with DFZ to clarify a few resettlement issues, not separate consultations. DFZ holds such ad hoc meetings upon request.</p>
5	<b>Incomplete and Poorly Organized Documentation</b>	<p>A preliminary review reveals significant gaps:</p> <p>a) ESIA Volume 1 is missing the key Chapter 24, "Transboundary Cumulative Impact Assessment," which is of greatest importance to downstream NGOs.</p> <p>b) The chapter on baseline data in Volume 1 consists of only 3.5 pages and cites irrelevant sources like the "CIA</p>	<p>a) Transboundary Cumulative Impact Assessment in full is provided in Volume 2.</p> <p>b) Baseline data in full is provided in Volume 2.</p> <p>c) Only the participants of the meeting in Ashgabat directly communicated the project proponents. They received an official response in June 2025. The Stakeholder Engagement Plan (SEP) has been updated on May 15, 2025 to include comments from all previous public consultations. Additionally, a matrix of</p>

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		<p>World Factbook" and articles on fossil birds, instead of providing current data for the project area.</p> <p>c) The Stakeholder Engagement Plan (SEP) omits information about the extensive correspondence between NGOs and the project proponents, as well as commitments made by World Bank representatives according to that correspondence.</p> <p>d) Volume 3 lacks a navigable table of contents and is missing the declared "Biodiversity Action Plan," which cannot be substituted by a narrow "No Net Loss" section.</p> <p>e) Chapter 10 on climate change (Volume 1) is not supported by data from the new hydrological and climate studies commissioned by the project management.</p> <p>f) Many ESIA sections appear unfinished and have not undergone proper quality control, making them unfit for public discussion and, more importantly, for project implementation.</p>	<p>questions and answers from the most recent public consultation has been prepared and will be incorporated into a future version of the SEP.</p> <p>d) Yes, the PMG recognizes that the ToC in Volume 3 of English version is corrupted. This will be fixed soon. The PMG believes that "No Net Loss" is a proper document to use during the implementation of the project.</p> <p>e) Hydrological and climate change study is still ongoing. The final findings of this study will be further used to update the relevant chapters of the ESIA.</p> <p>f) This is not a question or a comment; it is a statement that does not seem to require an answer.</p>
6	<b>Disregard for Previously Submitted Comments.</b>	The updated documents lack a summary of comments previously received from stakeholders and an explanation of how they were addressed. This violates the	This statement is incorrect. Regarding this matter, the PMG clarifies that no official correspondence was received directly from your organization. The fact is that all the letters were directed to the World Bank and other financiers. The PMG is not authorized to respond on behalf of the World Bank or other financiers.

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		<p>procedure set by the SEP and standard international practice. At the hearing, a <b>PMG representative misinformed attendees</b> by claiming that the PMG had "not received a single letter from foreign NGOs," even though they were regularly copied on all correspondence</p>	
7	<p><b>Contradictory Information from Project Representatives</b></p>	<p>The hearing revealed significant inconsistencies in the understanding of key project aspects:</p> <p>a) <i>Area of Impact</i>: Statements that the assessment extended "to the Aral Sea" were contradicted by claims that impacts downstream of the Nurek HPP would not be considered.</p> <p>b) <i>Power Generation</i>: The head of Tajikistan’s Association of Power Engineers <b>stated that the official generation figure (17 TWh/year) used in the ESIA is overestimated</b> by 15-20%, rendering specific impact calculations inaccurate.</p> <p>c) <i>Construction Timeline</i>: Different chapters cite <b>varying completion dates</b> (from 2032 to 2036), casting doubt on the existence of a unified work plan.</p> <p>d) <i>Risk Assessment</i>: PMG representatives could not confirm whether the results of a new seismic hazard assessment and</p>	<p>a) In this case, there is a misunderstanding that the terms "Area of Impact" and "Area of Assessment" are equivalent. The ESIA report repeatedly and clearly states that the project's area of impact extends downstream only to the Nurek HPP reservoir.</p> <p>b) This statement is incorrect. The representative of Tajikistan’s Association of Power Engineers actually noted at the meeting that the average electricity generation will be approximately 14.4 TWh, with fluctuations up to 1.2 TWh depending on water availability, and that the project will also contribute to increased output at downstream hydropower plants. These figures were revealed as a result of TEAS studies in 2011-2014. However, in 2024, JSC Rogun HPP, together with its designers, conducted a new assessment of the average annual electricity generation, taking into account the installation of improved turbines and generators. These calculations showed that the average annual electricity generation output of the Rogun HPP will be 17 TWh/year.</p> <p>c) This statement is incorrect. The ESIA report repeatedly and clearly states that the completion of the construction phase is expected in 2032. It seems the reviewers are confusing the completion of construction with the stages of filling the reservoir.</p> <p>d) This statement is incorrect. The PMG representative said “Following the recommendation of the Independent Panel of Experts on Dam Safety, an appropriate seismic study was completed this year. The initial study was</p>

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		dam break risk modeling were incorporated into the ESIA	completed in 2011, and the current version of the document includes updated data from the new seismic hazard study”. Additionally, it was noted that a more detailed response can be provided via email upon consent from the participant.
8	<b>Lack of Capacity for Environmental Monitoring</b>	<p>a) Tajik civil society representatives highlighted the national shortage of qualified personnel (over 300 inspectors needed) to implement the Environmental and Social Management Plan (ESMP) and proposed including a capacity-building program in the project.</p> <p>b) In light of these serious shortcomings, the Rivers without Boundaries Coalition cannot consider the event of September 11, 2025, as a legitimate public consultation, nor the disclosed documentation as ready for discussion.</p> <p>c) <b>We call upon the PMG and the World Bank to:</b></p> <ol style="list-style-type: none"> <li><b>Declare</b> the September 11, 2025, consultations null and void due to the incomplete and substandard quality of the documentation and procedural violations in stakeholder engagement.</li> <li><b>Ensure</b> the complete and proper disclosure of all finalized documents in relevant languages on the PMG and World Bank websites, including a table summarizing responses to previously</li> </ol>	<p>a) Indeed, the project intends to strengthen its capacity by involving additional qualified international and national E&amp;S specialists (environmental and social safeguards specialists, OHS specialists, gender specialists, and others) and increasing their number to more than 300. This will be a challenging task, as the project currently employs around 150 such specialists. The PMG, together with the JSC Rogun HPP, the Employer’s Representative and the State Institution Directorate for Flooding Zone, is currently developing an appropriate capacity-building program.</p> <p>b) The PMG does not agree with this unsubstantiated statement.</p> <p>c)</p> <ol style="list-style-type: none"> <li>The PMG considers the September 11, 2025 consultations a suitable introduction to the updated ESIA and SEP, as well as RAP 2/LRP 2. We have discussed this matter with the World Bank environmental and social team.</li> <li>The World Bank has informed the PMG of their plan to support the PMG and DFZ in consolidating comments on the environmental and social instruments and include them in the next update of the SEP. We are discussing the disclosure of summaries of the reports of the Environmental and Social Panel of Experts and the Dam Safety Panel of Experts.</li> </ol> <p>The ESIA, ESMP, RAP 2 and LRP 2 have been disclosed in Tajik, Russian and English at PMG’s website; they have been disclosed in English at the World Bank’s external website. Additional frameworks and plans will be disclosed at both websites as they become available.</p>

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		<p>received comments. We also demand the disclosure of reports from the expert panels on dam safety and environmental/social issues.</p> <p>3. <b>Announce</b> a new consultation schedule that provides for separate, in-depth discussions on each key document.</p> <p>4. <b>Establish</b> a new comment period of at least 30 days following the conclusion of proper consultations on the finalized documentation.</p> <p>5. <b>Strengthen</b> the World Bank's oversight function to ensure that all documents comply with its standards and international best practices.</p> <p>6. <b>Urgently schedule</b> the next meeting between World Bank representatives and civil society, as promised by the Bank's management but not held since March 2025.</p> <p>d) We consider this situation critical for ensuring the environmentally and socially sound completion of the Rogun HPP project and urge you to address our proposals with the utmost seriousness.</p>	<p>3. Consultations on the environmental and social instruments will be announced by PMG and DFZ through various media, including their websites.</p> <p>4. This was done.</p> <p>5. The World Bank has strengthened its oversight of the project by hiring additional staff to supervise the project.</p> <p>6. We've been informed that the meeting with civil society took place on October 7, 2025.</p> <p>d) Both the Borrower and the World Bank take the comments of civil society very seriously and we continue to welcome feedback on the various environmental and social instruments.</p>



ШЕКАРАСЫЗ  
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«Шекарасыз өзендер» Коғамдық қоры  
Rivers without Boundaries Public Fund

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RIVERS WITHOUT  
BOUNDARIES

**Ref:** RWB-250912

**Date:** September 12, 2025

To: Mr. Najy Benhassine, World Bank Regional Director for Central Asia

The World Bank Team Leaders for the Rogun HPP Project

Rogun HPP Project Management Group (PMG)

**Subject: Inadequate Public Consultation Process and  
Incomplete Documentation for the Updated Environmental and  
Social Impact Assessment (ESIA) of the Rogun HPP Project**

Dear Sirs/Madams,

The Rivers without Boundaries International Coalition expresses its profound concern regarding the consultations held in Dushanbe on September 11, 2025, on the updated Environmental and Social Impact Assessment (ESIA) and other environmental and social documents for the Rogun HPP project.

The information disclosure and consultation process organized by the Project Management Group (PMG) suffers from serious procedural violations, fails to meet international standards, and undermines confidence in the project's environmental and social assessment.

We wish to draw your attention to the following critical issues:

- 1. Improper and Untimely Notification.** The PMG announced the publication of the updated ESIA on August 22, 2025, by posting the information only in the "Tenders" section of its website. Key civil society organizations (CSOs) that had previously been actively involved in project discussions were not directly notified. Furthermore, at the time of publication, some documents were not available in Russian and Tajik. The announcement of the "final consultations with riparian countries" on September 11 was sent out on a weekend (Saturday, September 6), leaving stakeholders insufficient time to prepare. Despite the absence of the vast majority of civil society representatives (only two NGOs from outside Tajikistan were present), the PMG refused to acknowledge the rushed and illegitimate nature of the consultations.
- 2. Uncertain Status of Disclosed Information and Procedural Inconsistencies.** Typically, the posting of project documents on the World Bank's official project page signifies their compliance with the Bank's disclosure requirements. However, as of September 10, 2025, only the Resettlement Action Plan and the Livelihood Restoration Plan were available on the Bank's website; the core ESIA documents were missing. This creates confusion, reminiscent of late 2023 when the PMG prematurely released substandard documentation that was finalized and re-published only a month later. We urge the World Bank to

clarify whether the current disclosure on the PMG website constitutes the official start of the consultation period.

3. **Unacceptably Short Comment Period.** The deadline for comments was set for September 12, 2025—the next day after the consultation. This is a direct violation of the guidelines of all financing institutions involved, which require a reasonable period for document analysis. Despite requests from Tajik and international NGOs, the PMG refused to extend the deadline. The consultation moderator stated that foreign organizations were obligated to monitor all project-related websites themselves. We demand an extension of the comment period by at least 30 days from the date of proper consultations on each document, after they are brought into compliance with World Bank standards.
4. **Poorly Designed and Inadequate Consultation Format.** The updated project documentation contains over 2,000 pages of complex technical information. Holding a single event with a one-hour Q&A session to discuss all these documents is entirely insufficient and reduces the very idea of constructive consultation to a mere formality. This also contradicts previous assurances from World Bank representatives that separate, in-depth consultations would be held for each key document (ESIA, RAP, Cumulative Impact Assessment). During the hearing, Tajik NGOs also requested separate consultations on resettlement issues.
5. **Incomplete and Poorly Organized Documentation.** A preliminary review reveals significant gaps:
  - ESIA Volume 1 is missing the key Chapter 24, "Transboundary Cumulative Impact Assessment," which is of greatest importance to downstream NGOs.
  - The chapter on baseline data in Volume 1 consists of only 3.5 pages and cites irrelevant sources like the "CIA World Factbook" and articles on fossil birds, instead of providing current data for the project area.
  - The Stakeholder Engagement Plan (SEP) omits information about the extensive correspondence between NGOs and the project proponents, as well as commitments made by [World Bank](#) representatives according to that correspondence.
  - Volume 3 lacks a navigable table of contents and is missing the declared "Biodiversity Action Plan," which cannot be substituted by a narrow "No Net Loss" section.
  - Chapter 10 on climate change (Volume 1) is not supported by data from the new hydrological and climate studies commissioned by the project management.

Many ESIA sections appear unfinished and have not undergone proper quality control, making them unfit for public discussion and, more importantly, for project implementation.

6. **Disregard for Previously Submitted Comments.** The updated documents lack a summary of comments previously received from stakeholders and an explanation of how they were addressed. This violates the procedure set by the SEP and standard international practice. At the hearing, a PMG representative misinformed attendees by claiming that the PMG had "not received a single letter from foreign NGOs," even though they were regularly copied on all correspondence.
7. **Contradictory Information from Project Representatives.** The hearing revealed significant inconsistencies in the understanding of key project aspects:
  - **Area of Impact:** Statements that the assessment extended "to the Aral Sea" were contradicted by claims that impacts downstream of the Nurek HPP would not be considered.
  - **Power Generation:** The head of Tajikistan's Association of Power Engineers stated that the official generation figure (17 TWh/year) used in the ESIA is overestimated by 15-20%, rendering specific impact calculations inaccurate.
  - **Construction Timeline:** Different chapters cite varying completion dates (from 2032 to 2036), casting doubt on the existence of a unified work plan.
  - **Risk Assessment:** PMG representatives could not confirm whether the results of a new seismic hazard assessment and dam break risk modeling were incorporated into the ESIA.
8. **Lack of Capacity for Environmental Monitoring.** Tajik civil society representatives highlighted the national shortage of qualified personnel (over 300 inspectors needed) to implement the Environmental and Social Management Plan (ESMP) and proposed including a capacity-building program in the project.

In light of these serious shortcomings, the Rivers without Boundaries Coalition cannot consider the event of September 11, 2025, as a legitimate public consultation, nor the disclosed documentation as ready for discussion.

**We call upon the PMG and the World Bank to:**

1. **Declare** the September 11, 2025, consultations null and void due to the incomplete and substandard quality of the documentation and procedural violations in stakeholder engagement.
2. **Ensure** the complete and proper disclosure of all finalized documents in relevant languages on the PMG and World Bank websites, including a table summarizing responses to previously received comments. We also demand the disclosure of reports from the expert panels on dam safety and environmental/social issues.
3. **Announce** a new consultation schedule that provides for separate, in-depth discussions on each key document.

4. **Establish** a new comment period of at least 30 days following the conclusion of proper consultations on the finalized documentation.
5. **Strengthen** the World Bank's oversight function to ensure that all documents comply with its standards and international best practices.
6. **Urgently schedule** the next meeting between World Bank representatives and civil society, as promised by the Bank's management but not held since March 2025.

We consider this situation critical for ensuring the environmentally and socially sound completion of the Rogun HPP project and urge you to address our proposals with the utmost seriousness.

Sincerely,

A handwritten signature in black ink, appearing to be 'ES', with a horizontal line extending to the right.

Eugene Simonov,

Coordinator, Rivers without Boundaries International Coalition