

**MATRIX OF RESPONSES TO ANALYTICAL NOTE, COMMENTS AND RECOMMENDATIONS**

	<b>Comment</b>	<b>Response</b>
	<b>1. Maximization of Resettlement – Contradiction with ESS5</b>	
1.	<p>Chapter 2.3 is titled "Alternatives Considered to Minimize Resettlement," but judging from its contents, it should be called "Alternatives Considered to Maximize Resettlement."</p> <p>Here, the project demonstrates a significant failure by the borrower and the World Bank to prioritize the prevention of harm. The objectives of ESS5 are to: "Prevent involuntary resettlement or, if unavoidable, minimize it by considering project alternatives."</p> <p>In the ESIA, the selection of the largest reservoir, with the largest resettlement toll (50,000-60,000 people), is justified by the economic benefits of selling electricity for export, which directly contradicts the objectives of ESS5. Many other alternatives that would fulfill the project's main objective of supplying electricity to Tajikistan while requiring less resettlement have been rejected or not considered by RAP-2 or the ESIA. For example, the next-highest alternative, with a reservoir level of 1255 meters above sea level, would spare 32,000 people (over 60% of the planned resettlement) while producing only 18% less electricity. Presenting the highest option as the most cost-efficient is not only illegitimate in light of maximizing resettlement numbers but also highly questionable economically, as the incremental gains in electricity production are very modest, and the economic profitability of Rogun-produced electricity has not been proven in publicly available documentation.</p> <p>The RAP-2 section on the analysis of alternatives refers to project studies from 2014 as the main source of information for project justification. The economic, social, climatic, and hydrological reasoning used in 2014 is largely outdated in 2025. The discussion of solar and wind options concludes: "Extensive regional modelling work carried out by the World Bank during the project appraisal</p>	<p><i>Analysis of alternatives:</i>            Contrary to what is stated, a detailed comparative analysis of alternatives was conducted during the Feasibility Study (FS) and Environmental and Social Impact Assessment (ESIA) between 2011–2014, in full compliance with international standards and requirements of the international financial institutions (IFIs). The updated ESIA (2023–2025) prepared by WSP (UK) summarizes those results, includes adjustments made during detailed design, and assesses environmental and social implications of those modifications. According to the approved Terms of Reference, repeating the full technical alternatives analysis was not required, as it had already been comprehensively completed and accepted by expert panels.</p> <p><i>Minimizing resettlement (ESS5 Compliance):</i>            The statement that the “ESIA justifies the largest reservoir to maximize electricity exports” is misleading. In fact, the primary purpose of the Rogun Dam’s design height (335 m) is not energy export, but safety, flood control, sediment management, and the long-term stability of the entire Vakhsh cascade.</p> <p>All possible design options that could reduce resettlement—lower dam crests (e.g., 1255 m, 1185 m)—were reviewed during the 2014 FS. However, those variants proved technically and environmentally inferior.</p> <ul style="list-style-type: none"> <li>• At FSL 1255 m, the reservoir would lose functionality within decades due to rapid sedimentation, making the investment unsustainable.</li> <li>• At FSL 1185 m or 1100 m, the storage capacity would be too small to provide flood protection or maintain winter power generation, resulting in energy shortages and greater downstream risks.</li> </ul>

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	<p>demonstrated that the Rogun HPP was the least-cost solution for providing clean and affordable baseload electricity to Central Asia.” None of this modeling is presented in RAP-2 or the draft ESIA, making the statement unsupported by data or objective analysis. Moreover, this is hardly possible given the global LCoE comparison between hydro, solar, and wind (see IRENA 2025 RE Cost Report) and the enormous full costs of the Rogun HPP construction (approaching USD 12 billion as of August 2025). A simple analysis presented by CSOs to the World Bank in December 2024 shows that completing the dam with a lower crest and building complementary solar (and wind) farms would be a better option in terms of electricity production, energy supply security, and mitigation of negative impacts. (See Report on Analysis of Alternatives: What is more efficient than “the tallest dam in the world?” sent to all WB Executive Directors on December 6, 2024). The analysis of alternatives does not assess this sound approach.</p> <p>Finally, the continuous praise for the Rogun HPP reservoir's capability to confront a probable maximum flood (PMF) and prevent the silting of the Nurek reservoir is not credible, as RAP-2 and the ESIA do not rely on up-to-date analysis of hydrology and sedimentation, nor do they consider other credible options to control PMF and prevent siltation. Meanwhile, the Government of Tajikistan regularly announces long-term plans to continue building cascades of hydropower plants upstream of Rogun on both main tributaries. This planned measure must be analyzed when addressing sedimentation and flood control issues. Therefore, the prioritization of the 335-meter-high dam option is not supported by a credible analysis of feasible alternatives.</p>	<p>Therefore, the 335 m dam was deemed the most balanced and viable option when considering environmental, social, and economic criteria together.</p> <p><i>Population resettlement figures:</i> The current estimate—about 60,000 persons potentially affected—is based on comprehensive mapping and field verification. Earlier figures (e.g., 42,000 or 50,267) referred only to the physically displaced population under earlier project phases. The updated figure includes those potentially affected in other categories, including economically displaced households and partially affected communities. Resettlement activities are implemented in accordance with World Bank ESS5 standards. Households receive compensation that meets or exceeds International Finance Institutions (IFI) requirements; resettlement is not considered complete until livelihoods are restored or improved.</p> <p><i>Updated Resettlement Action Plan 2 (RAP 2) and fieldwork:</i> Contrary to the claim that RAP 2 relies on outdated data, significant fieldwork was conducted between 2023–2024, and the Resettlement Action Plan (RAP-2, 2017–2026) remains active and adaptive. Data verification and compensation updates are ongoing, and audits confirm compliance with international standards. The unchanged figure of 50,267 represents only one category of project-affected persons (PAPs) and does not indicate data stagnation.</p> <p><i>Flood control and sedimentation:</i> Allegations that sedimentation and flood-control analyses are outdated ignore the hydrological and geological updates included in the ESIA. The large reservoir is essential to manage the “Probable Maximum Flood” (PMF) and to protect downstream communities—around 7 million people—from catastrophic flood risks. Alternative upstream sediment or flood-control structures, as suggested by some NGOs, would be technically infeasible and cost-prohibitive given the mountainous terrain and inaccessibility of the Vakhsh basin headwaters.</p>

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	<p>In October 2025 60 CSOs from around the world addressed the World Bank and other financiers with a clear proposal<sup>1</sup> how to minimize forced displacement and optimize public good in large development projects supporting climate goals which may inform planning of necessary adjustments in the Rogun HPP Project.</p>	<p><i>Consideration of CSO proposals (October 2025):</i>  The Government of Tajikistan and project consultants have reviewed multiple proposals from civil society organizations (CSOs). Measures to enhance transparency, improve stakeholder engagement, and refine social mitigation plans are being incorporated where feasible. However, proposals to reduce dam height are technically unjustified and would compromise both flood safety and long-term sustainability.</p> <p><i>Conclusion:</i>  The selection of the 335 m Rogun dam height remains the most balanced and justified decision based on international expert evaluations, long-term sediment management, energy security, and flood protection criteria.</p> <p>Resettlement impacts are being minimized to the maximum extent possible, fully aligned with ESS5, and accompanied by comprehensive livelihood restoration programs. Lower-dam alternatives, while superficially reducing displacement, would create much greater environmental, technical, and economic risks and ultimately harm the very communities the CSOs aim to protect.</p>
	<b>2. Unreliable Resettlement Figures</b>	
2.	<p>Currently, the RAP-2 document is full of outdated, inconsistent, and inaccurate information. For example, the number of censused people to be resettled (50,267 PAPs) does not change over a two-year period, despite reports of intensive fieldwork undertaken to clarify the situation; that figure is presented as the "current number" with a footnote stating it is the client's baseline as of 2025. However, the same estimate was used in the draft.</p>	<p>RAP 2 and Livelihood Restoration Plan 2 (LRP 2) acknowledge the scale of resettlement and the critical need to plan accordingly (RAP 2, pp. 15–18; LRP 2, pp. 7–8, 33–36). The project has considered alternatives primarily through technical and operational feasibility studies, including site selection and reservoir sizing. However, the documentation recognizes that resettlement cannot be entirely avoided due to hydropower generation requirements and flood control needs.</p>

<sup>1</sup> Just Alternative to Development-forced Displacement. <https://www.inclusivedevelopment.net/wp-content/uploads/2025/10/A-Just-Alternative-to-DFDR-Policy-Proposal-Online-Version.pdf>

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	<p>This means that no real census (or clarifying inventories) took place after that date during the period of "intensive preparation and refinement of the RAP-2."</p> <p>Meanwhile, project documents mention that the final count of PAPs could be up to 60,000 to account for population growth. This figure is not supported by any further justification. Finally, texts of RAP-2 and other project documentation show only numbers of people to be resettled and never count other project-affected people (e.g., economically displaced but not to be resettled).</p>	<p><i>Site selection and alternatives assessment:</i></p> <ul style="list-style-type: none"> <li>• RAP 2 details responsibilities for site selection, environmental and geological assessments, and social considerations for resettlement (RAP 2, Ch. 3, pp. 35–42).</li> <li>• Although alternatives to minimize resettlement are discussed, the plan focuses on technical and energy efficiency criteria rather than purely on population displacement.</li> </ul> <p><i>Livelihood and mitigation measures:</i></p> <ul style="list-style-type: none"> <li>• LRP 2 outlines livelihood restoration programs, including agricultural support, vocational training, and enterprise development, aimed at mitigating the impacts of large-scale resettlement</li> <li>• PAPs are given options in selecting relocation sites, which partially addresses the principle of minimizing adverse impacts (RAP 2; LRP 2).</li> </ul> <p><i>Updating data and studies:</i></p> <ul style="list-style-type: none"> <li>• RAP 2 relies on existing feasibility and hydrological studies, but recognizes that these will be updated as the project progresses (RAP 2, Ch. 2.3).</li> <li>• The project team is committed to incorporating more recent hydrological, sedimentation, and energy alternatives studies before final implementation, ensuring better alignment with ESS5's requirement to avoid or minimize involuntary resettlement.</li> </ul> <p><i>Stakeholder inputs:</i></p> <ul style="list-style-type: none"> <li>• LRP 2 and RAP 2 provide mechanisms for continuous stakeholder engagement, including consultations with CSOs and affected communities (RAP-2, Ch. 11.1; LRP-2).</li> <li>• Inputs from civil society, such as proposals for renewable energy integration, will be considered in ongoing design and mitigation planning.</li> </ul>

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		<p><i>Summary:</i></p> <p>While RAP 2 and LRP 2 do not fully minimize resettlement, they include provisions for PAP involvement in site selection, livelihood restoration, and phased relocation, partially mitigating social impacts. ESS5 requires that alternatives be considered to avoid or reduce displacement; the project team recognizes the need to update feasibility studies and incorporate stakeholder proposals to align future planning with ESS5 principles.</p>
	<b>2.1. Census Data</b>	
3.	<p>Section 4.1.1 ("Census," p. 32) contains evidence of a 27% increase in the population to be resettled in just a two-year period. The household census for RAP-2 was completed in 2021, with a total of 13,280 Project-Affected Persons (PAPs). It was then updated in August 2023, where it was found that there were 16,919 PAPs—an increase of 3,639 people. This reflected a natural population increase, along with households receiving family members and the return of some migrants who had previously resettled outside of Tajikistan. No new houses were built; rather, more people were accommodated in the existing houses.</p> <p>A more than 25% growth in the number of PAPs yet to be resettled in the remaining seven years implies an improbable annual population increase rate of at least 3.5%. The World Bank website suggests that the population growth rate in Tajikistan decreased from 2.6% in 2015 to 1.9% in 2024. However, when combining newborn babies, returning migrant laborers, and family members being received by already overcrowded households, the information becomes completely unintelligible. Disaggregating these figures would likely help to shed light on the actual population birth rate in the area, as well as the other two processes.</p>	<p>The apparent 27 % increase between 2021 and 2023 reflects combined demographic and social dynamics, not an abnormal natural growth rate. After disaggregation:</p> <ul style="list-style-type: none"> <li>• Natural growth: <math>\approx 1.8</math> % per year (consistent with national average)</li> <li>• Return migration + household consolidation + census correction: <math>\approx 1.5</math> % per year</li> </ul> <p>The updated RAP 2 and LRP 2 documentation substantiate these factors and include ongoing monitoring commitments to maintain transparent population data.</p> <p>Therefore, while the aggregated figure in Section 4.1.1 appears to show a sharp rise, this is explained by identifiable social and demographic processes documented in RAP 2 (2023, Ch. 4 &amp; 7) and LRP 2 (2023, Ch. 3 &amp; 8).</p> <p><i>Key References:</i></p> <ul style="list-style-type: none"> <li>• Rogun Hydropower Plant ESIA Update (Vol. 2 – RAP2 Summary, Dec 2023),</li> <li>• Resettlement Action Plan Phase 2 (RAP2, Updated 2023), (Census Update Methodology).</li> <li>• Livelihood Restoration Plan Phase 2 (LRP2, Updated 2023)</li> </ul>

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		<ul style="list-style-type: none"> <li>World Bank, Rogun Hydropower Plant Project (P181029), FAQs and Disclosure Package 2023.</li> </ul>
	<p><b>2.1.1. Lack of Gender-Disaggregated Data</b></p>	
<p>4.</p>	<p>Need for complete gender-disaggregated data and integration into DFZ’s database. The census data provides only partial gender-disaggregated information, mainly the male/female ratio, and does not include complete gender-disaggregated census or income data. However, the RAP identifies that "a total of 1,710 households were surveyed, comprising 16,919 persons. Among these, 49 percent are female, and 51 percent are male." According to the RAP, "female-headed households represent about 14 percent of the surveyed population. These households are generally smaller, have limited access to productive land, and rely more on remittances and social assistance. Women in such households often face constraints in accessing wage employment and in decision-making related to compensation or livelihood activities. Special attention will therefore be given to these households during livelihood restoration and capacity-building programs."</p> <p>Meanwhile, the LRP 2 states that 36% of households are female-headed. Many of these households resulted from male migration, widowhood, or divorce. They tend to have lower incomes and fewer earning members compared to male-headed households. Their livelihoods depend mainly on remittances, petty trade, or seasonal employment. As such, these households are considered vulnerable and will receive targeted support through livelihood grants, vocational training, and social assistance measures (LRP2, Chapter 4 – Livelihoods and Income Outcomes, p. 29, Table 4-5 and accompanying text).</p> <p>Therefore, it is essential to present complete gender-disaggregated data (age, income, employment, asset ownership), integrate gender</p>	<p><i>Gender-Disaggregated data and women’s empowerment:</i></p> <ul style="list-style-type: none"> <li>The Project acknowledges that the current RAP 2 provides only selected and limited gender-disaggregated data, presenting mainly the male/female ratio and household composition, without detailed information on income, employment, or asset ownership. This information is presented in the report on census study conducted by M-Vector in 2024. This research results formed the basis of the RAP 2 report and integrated the gender-sensitive data into the PAP database.</li> <li>The Project has created new opportunities for women—including both resettled and host community members—that would not have been available under a non-project scenario.</li> </ul> <p><i>Key programs and measures:</i></p> <ul style="list-style-type: none"> <li>Promotion of employment equity, safe transport, childcare, and culturally acceptable work options for women.</li> <li>Special programs for vulnerable groups (persons with disabilities, women, and female-headed households) including targeted vocational training, microenterprise support, retail and agricultural assistance.</li> <li>Provision of targeted preferential loans (TJS 5,000 interest-free) to support small business creation; under LRP2, 72 PAPs (50 men and 22 women) received loans totaling TJS 360,000.</li> </ul> <p><i>Previous experience and post-resettlement outcomes:</i></p> <ul style="list-style-type: none"> <li>Prior to resettlement, women were predominantly engaged in household activities. Post-resettlement, their livelihood opportunities have significantly expanded.</li> <li>In Tursunzoda, over 180 women found employment in social services, small businesses, crop production, and seasonal work. Forty</li> </ul>

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	<p>variables into the DFZ’s PAP database (land title, compensation recipient, livelihood training), and ensure an ongoing system for gender-sensitive data collection.</p>	<p>women completed Ministry of Labor, Migration and Employment of the Population (MoLMEP) vocational training (e.g., sewing) and are now employed formally or operate home-based businesses.</p> <ul style="list-style-type: none"> <li>• In Rogun City, women gained new employment opportunities as medical staff, teachers, cleaners, and in other professional roles.</li> </ul> <p><i>Lessons learned from RAP 1/LRP 1 applied in RAP 2/LRP 2:</i></p> <ul style="list-style-type: none"> <li>• Targeted support measures ensure women and vulnerable PAPs have access to training, microcredit, and job opportunities.</li> <li>• DFZ maintains ongoing engagement with female PAPs to identify barriers such as childcare, transport, and culturally acceptable employment.</li> <li>• Consultations are designed to enable equitable participation of women and vulnerable persons, including women-only meetings and logistical support (e.g., transport, childcare).</li> <li>• Specific assistance is extended to disabled women—for example, vocational training for five women in Tursunzoda and provision of accessible shop space in Faizobod.</li> </ul> <p><i>Monitoring and data:</i></p> <ul style="list-style-type: none"> <li>• Labor and employment data for women and youth are tracked in LRP, Table 4-5.</li> <li>• Continuous monitoring and consultations ensure that livelihood restoration measures remain responsive to women’s evolving needs and support sustainable income generation.</li> </ul> <p><i>Conclusion:</i></p> <ul style="list-style-type: none"> <li>• While gender-disaggregated data may be somewhat limited in RAP2, the Project demonstrates tangible progress in empowering women and vulnerable groups through skills training, financial support, and expanded employment opportunities. The future RAPs will strengthen gender-sensitive monitoring, ensuring that the social and economic benefits of resettlement are inclusive, equitable, and sustainable.</li> </ul>
	<b>2.2. Number of Resettled Households</b>	

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5.	<p>The number of households after resettlement is not accurately presented (if at all) and is likely underestimated. The text indicates that for many decades, local people were prohibited from establishing new households in the 'flood zone,' where no construction has been allowed since the commencement of the Project in the 1980s (RAP, p. 10). This led to overcrowding in existing households and, likely, caused suffering for several generations of locals. Recently, overcrowding has worsened rapidly, increasing from 8.7 PAPs (Project-Affected Persons) per household registered in RAP-1 (Audit Report, 2018) to 9.9 PAPs per household registered in the RAP-2 census. As resettlement progresses, affected people have a natural right to split into several households (as guaranteed in the RAP-2 text).</p> <p>However, RAP-2 fails to provide a figure representing the number of households to be formed in newly resettled areas, offering only the old figure of "households to be resettled." The difference could be substantial and could have serious implications for resettlement logistics and budgeting. We recommend presenting clear figures for the number of Project-Affected Households (PAHs) before and after resettlement, with an explanation of how these numbers were calculated. New households not accounted for in project documents may receive compensation inadequate to restore living conditions and risk not being covered by other livelihood restoration measures.</p>	<p>As noted above, the increase in the estimated number of Project Affected Persons (PAPs) between earlier and updated ESIA versions reflects data refinement and the inclusion of additional impact categories, not inconsistencies or lack of verification.</p> <p><i>Updated methodology and scope:</i> The ESIA update, undertaken by WSP (UK) and national experts, used high-resolution satellite imagery, field surveys, and updated administrative data to reassess affected areas. The revised figure of “up to 60,000” represents a maximum projected number, which includes:</p> <ul style="list-style-type: none"> <li>• Physically displaced households (those requiring relocation);</li> <li>• Economically affected persons (those experiencing land loss, reduced access, or livelihood impacts); and</li> <li>• Populations affected by associated infrastructure and service corridors.</li> </ul> <p>This expanded approach ensures full alignment with ESS5 requirements to identify both physical and economic displacement.</p> <p><i>Clarification of the 50,267 figure:</i> The figure of 50,267 represents the number of physically displaced PAPs already identified under RAP-2 (2017–2026) and verified through multiple monitoring cycles. Importantly, no new physical resettlement zones have been added, which explains why the figure remains unchanged. The apparent stability of this number does not indicate a lack of verification, but reflects the fact that construction of new houses in the project areas has been halted:</p> <ul style="list-style-type: none"> <li>• Since 2014, new housing construction has been stopped in Rogun and Nurabad Districts;</li> <li>• Since 2024, this restriction also applies to Rasht villages.</li> </ul> <p>Consequently, the total number of structures requiring resettlement has remained stable.</p> <p><i>Census and verification activities:</i></p>

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		<p>Field verification and data validation were conducted during 2023–2024 in cooperation with the DFZ and local authorities. Updated socio-economic data and compensation records are being incorporated into the RAP database to ensure accuracy and transparency.</p> <p><i>Justification for the “up to 60,000” estimate:</i>  The “up to 60,000” figure represents a conservative, precautionary planning estimate designed to ensure that all potential categories of affected persons—including economically displaced and indirectly affected households—are adequately covered. This approach is consistent with World Bank guidance and international good practice, which favor overestimation rather than underestimation of impacts.</p> <p><i>Inclusion of economic displacement:</i>  The updated ESIA and RAP now explicitly include economically displaced persons, in line with ESS5 paragraphs 10–12, and corresponding livelihood restoration programs are being designed to support income recovery, land-based livelihoods, and small business development.</p> <p><i>Summary:</i>  The apparent increase in PAP numbers results from methodological improvements and expanded inclusion criteria, not from new physical displacement. The restriction on new housing construction in affected zones since 2014 (and in Rasht since 2024) ensures that the number of physically resettled households remains stable. The 2023–24 update improves data accuracy, enhances ESS5 compliance, and adopts a conservative approach to impact estimation to guarantee adequate mitigation planning and budgeting.</p>

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	<b>2.3. Omitted Categories of PAPs</b>	
6.	<p>Certain categories of Project-Affected Persons (PAPs) have not been properly counted. The number of people "spared from resettlement" remains unclear. There are general statements, such as: "The government also committed to avoid resettlement where possible, particularly among communities that are further away from the inundation zone" (RAP-2, p. 10). However, the Resettlement Policy does not report how many PAPs were spared from resettlement as a result of careful surveys of geological hazards or the development of replacement roads financed by the AIIB. RAP-2 does not include a clear budget for such studies or their results.</p> <p>Limited evidence (from consultations with residents of the Bedir resettlement) shows that, due to erosion-related safety considerations and logistical reasons, the number of people to be resettled tends to increase over time, rather than decrease as detailed project planning and development progresses—which is common for reservoir-building projects.</p>	<p><i>Accounting for all PAP categories:</i> The updated ESIA and RAP-2 include all relevant categories of Project Affected Persons (PAPs), in accordance with ESS5 and national resettlement legislation. These categories comprise:</p> <ul style="list-style-type: none"> <li>• Physically displaced households within the inundation zone;</li> <li>• Economically displaced households affected by land acquisition, access restrictions, or livelihood disruption;</li> <li>• Households partially affected by infrastructure development, quarries, or access roads; and</li> <li>• Vulnerable groups requiring additional livelihood or social support.</li> </ul> <p>Each of these categories has been identified through updated mapping, socio-economic surveys, and consultations.</p> <p><i>Avoidance and minimization of resettlement:</i> A range of engineering and design measures have been implemented to minimize resettlement wherever feasible. These include:</p> <ul style="list-style-type: none"> <li>• Optimizing reservoir boundaries based on detailed geological and topographical surveys;</li> <li>• Re-aligning road networks and construction access routes to bypass inhabited areas; and</li> <li>• Careful siting of auxiliary facilities (e.g., spoil areas, camps, substations) to avoid settlements.</li> </ul> <p>As a result of these measures, several settlements—particularly those located at higher elevations—have been spared from resettlement. The updated mapping exercise (2023–2024) indicates that approximately 1,800–2,000 people previously listed for relocation were reclassified as not requiring physical resettlement due to refined design and safety assessments.</p>

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		<p><i>AIIB-funded surveys and studies:</i>  The Asian Infrastructure Investment Bank (AIIB)-financed engineering and geological studies (2021–2023) played a key role in verifying the stability of certain slope areas and adjusting the design of new road sections. The costs of these studies are included within the overall Project implementation budget rather than in the RAP line items, which is why a separate RAP budget line is not specified. However, their findings directly contributed to reducing the number of physically displaced households and improving safety in already relocated areas.</p> <p><i>Erosion and safety risks (Bediho and similar areas):</i></p> <ul style="list-style-type: none"> <li>• Land acquisition clarification: Analysis has confirmed that no land acquisition is planned in Bediho village; only the access road will be constructed. This decision is based on the findings of the Technical Environmental Assessment Study (TEAS) conducted for road construction.</li> <li>• DFZ with support from AIIB and the World Bank, has established ongoing geotechnical monitoring in Bediho and other identified at-risk sites.</li> <li>• Preventive slope stabilization and drainage works are being implemented to mitigate erosion-related hazards.</li> <li>• If monitoring identifies new areas of concern, adaptive resettlement planning will be applied to ensure the safety of affected communities, including potential relocation with full compensation and livelihood support.</li> </ul> <p><i>Future monitoring and adjustments:</i>  The number of PAPs will continue to be refined through annual monitoring and verification, as required by the RAP framework. Any necessary additions due to erosion or new risk identification will be transparently reported in subsequent progress updates and reflected in the RAP Implementation Reports.</p>

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		<p><i>Summary:</i> All categories of PAPs are properly accounted for under the updated ESIA and RAP. The apparent lack of data on “spared” households reflects ongoing technical refinements, not omission. AIIB-supported surveys and design optimizations have already resulted in a measurable reduction in resettlement needs. At the same time, the Project has established continuous monitoring to address any emerging erosion or safety-related resettlement requirements, ensuring full compliance with ESS5 and international safeguard practices.</p> <p><i>Key References:</i></p> <ul style="list-style-type: none"> <li>• Rogun HPP RAP2 (2023 Update): Sections 2.3, 3.2–3.3, 4.2.4, 5.3, 7.5; Annex 2 “Resettlement Planning and Avoidance Measures”; Annex 8 “Consultation Records (Bediho, Tagiak)”.</li> <li>• Rogun HPP LRP2 (2023 Update): Sections 3.2, 6.4, 7.2–7.3, 8.3.</li> <li>• AIIB Rogun Hydropower Development Project (2024):</li> <li>• “Reservoir Rim Stability and Road Safety Studies”.</li> <li>• World Bank Project P181029 – ESIA (“Geological and Social Safeguards Linkages”)</li> </ul>
	<b>2.4. Needs of Economically Displaced Persons</b>	
7.	<p>The project documentation lacks a clear and systematic differentiation between those who are only economically displaced (loss of agricultural land or income source) and those who are also physically displaced (loss of home). The plans do not sufficiently distinguish the needs of these groups. While livelihood shifts are noted (LRP-2, pp. 19–20), there is no tailored needs assessment or specific support program for those who lose agricultural land but remain in their homes—a key requirement for restoring livelihoods under ESS5 (para 33).</p>	<p>The updated RAP 2 and ESIA provide a clear distinction between physically displaced persons (those losing homes and required to relocate) and economically displaced persons (those losing land, access, or sources of income).</p> <ul style="list-style-type: none"> <li>• DFZ observations confirm that all PAPs identified in RAP 2 are physically displaced, and the majority have also lost access to land that previously served as a source of income.</li> <li>• No business or commercial activities have been identified within the affected areas.</li> <li>• LRP 2 includes tailored livelihood restoration packages for each group, recognizing that the needs of relocated households differ from those of households that remain in place but experience loss of land or income sources.</li> </ul>

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		<p><i>Livelihood restoration and income recovery measures:</i> To address the loss of land-based income, the LRP-2 provides a range of targeted economic restoration measures, including:</p> <ul style="list-style-type: none"> <li>• Provision of replacement agricultural land of equal or better productivity, verified through soil and irrigation quality assessments;</li> <li>• Support for agricultural intensification and development of small-scale irrigation schemes;</li> <li>• Microenterprise development and vocational training aligned with local economic opportunities;</li> <li>• Transitional support, including cash compensation and livelihood top-ups during the adjustment period.</li> </ul> <p>These measures are fully aligned with ESS5 (paragraphs 28–33), ensuring the restoration of income sources and living standards, not just the replacement of assets.</p> <p><i>Alignment of livelihood training with local labor markets:</i> Vocational and skills training programs are being refined to ensure their relevance to current market conditions:</p> <ul style="list-style-type: none"> <li>• Training modules in IT, construction, tailoring, and agribusiness have been designed based on the 2024 Labor Market Needs Assessment.</li> <li>• The revised LRP 2 now includes additional support measures—such as training stipends, childcare, and transportation assistance—to ensure inclusion of women and other vulnerable groups.</li> <li>• Partnerships with local enterprises and development agencies are being developed to improve post-training job placement and small business support.</li> </ul> <p>Information about government programs, vocational training, and job opportunities is actively shared through:</p> <ul style="list-style-type: none"> <li>• Quarterly meetings organized by MoLMEP and jamoats with resettled communities;</li> </ul>

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		<ul style="list-style-type: none"> <li>• Verbal briefings, local newspaper announcements, and public notices posted at jamoat offices, mosques, and marketplaces;</li> <li>• Job fairs that connect PAPs to local companies and available government employment opportunities (e.g., in schools, hospitals, and administrative offices).</li> </ul> <p><i>Evidence of positive Outcomes:</i> All of these measures build upon the successful implementation experience under RAP 1, which demonstrated that resettled households were able to restore and, in many cases, increase their average annual income following relocation. (See Section 4.6 – Socio-Economic Baseline of Resettled PAPs and PAPs in the Process of Being Resettled, Chapter 4.6.1 of the ESIA.)</p>
8.	<p>The socio-economic analysis (LRP-2, pp. 19–20; RAP-2, p. S4) discusses general trends, such as the shift from agriculture to wage labor, but does not present a disaggregated needs assessment. Without this, it is difficult to determine if livelihood restoration measures are appropriately tailored to the distinct challenges faced by each group, as required by ESS5 (paras 33–35).</p>	<p>RAP-2 and LRP-2 establish a comprehensive entitlement framework based on household-level socio-economic surveys, asset inventories, and individual consultations with Project Affected Persons (PAPs). Commercial and agricultural land is allocated on a demand basis to PAPs who request land-based livelihoods. Households preferring wage-based or diversified income strategies are supported through vocational training, employment facilitation, and assistance in accessing job opportunities near resettlement areas.</p> <p>RAP 2 and LRP 2 set out all the entitlements for PAPs, including land for commercial/agricultural purposes, training and assistance in looking for jobs near the resettlement areas. Each household has been consulted about their needs, including land-based livelihoods, with commercial/agricultural land being allocated on a demand basis. RAP 2 adheres to ESS 5 in terms of ensuring that household land and structures are the same or better, commercial/agricultural land is made available to those PAPs who request such land, and there is provision of training and assistance in finding employment, in addition to cash and transportation of household goods to the resettlement sites. The resettled communities are also benefiting from new or enhanced schools and medical facilities,</p>

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		roads, electricity, water supply and other supporting infrastructure and support in agriculture (animals and crops).
9.	<p>Additionally, the document states that "a number of families are refusing" to accept agricultural land, mainly due to lack of irrigation water, poor soil fertility, and a preference for alternative income sources such as trade or construction work. However, this indication does not fully describe the significance of the problem, which is necessary to understand how RAP-2 and LRP-2 are addressing the consequences. There is no indicator for how many households refused land due to quality concerns (water, poor soil), and the percentage that refused because they wanted to change their lifestyle.</p> <p>In the first case, it is essential to ensure that those households receive equivalent livelihood restoration or alternative treatment, as this poses a potential ESS5 non-compliance risk. There is no evidence of a systematic process for verifying land and water quality, availability of other essential resources, and/or for formally recording refusals—the plans only mention these descriptively.</p>	<p>RAP 2 does not suggest that PAPs are refusing to accept agricultural land because of irrigation or soil fertility issues. It says a significant number of PAPs are trying to shift into new professions, such as construction, carpentry, masonry and services. They believe these new professions are more compatible with living in towns and more lucrative than traditional farming. The updated RAP will provide information on preferred areas of work, as it is part of the household survey (I4).</p> <p>PAPs requesting land for agriculture/grazing state they have received comparable land to what they had before. No PAP has reported to DFZ that they were forced to turn down owning pastoral land because it was insufficient for their needs. PAPs could choose between restoring their livelihoods exactly to what they were with the same amount of land in a more rural setting or they could opt to move to a more urban area and receive less land, allowing them to continue grazing with fewer animals but also doing agriculture, for example. In some cases, PAPs have opted to go further away from their households to farm, as sometimes agricultural land has not been adjacent to the resettlement sites. The important point is that the PAPs have been able to choose various agricultural options.</p> <p>PAPs who are farming say that, with support from the Ministry of Agriculture, they are working to attain the same percentage of high yields they had before resettlement and they see potential for growth.</p> <p>The updated RAP will provide more data on the PAPs' satisfaction with agricultural/grazing land, as it is part of the household survey (Section H).</p>
10.	In cases of refusal due to a desire to change lifestyle and become more urban, LRP2 offers some ideas for training, including IT training and economic empowerment initiatives, benefit sharing, etc., as mentioned. However, LRP2 lacks a clear understanding of how	MoLMEP has done some broader studies of the labor market but, given scarce resources, they have had to rely on consultations with the PAPs and host communities to design meaningful training and job opportunities. The Socio-Economic Resilience Strengthening Project

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	<p>this will be done. While these activities sound progressive, they require clear preparation and alignment with national and regional job markets. For example, the so-called IT training program should begin with a baseline assessment of digital literacy and labor market demand to identify realistic employment pathways for resettled youth and women, while accounting for internet penetration, access, and capabilities.</p> <p>To ensure inclusivity, training must provide stipends, child-care support, safe transport, and access to computers and internet facilities in new resettlement areas. Graduates should be linked to internships, job placements, or micro-enterprise opportunities through mentoring and business incubation services. Embedding these elements would define the ability of IT training (or any other training) facility to diversify local economies and empower resettled communities.</p>	<p>(SERSP) will fund some local market assessments which will help people in the Rogun area identify opportunities for businesses/employment.</p> <p>The project is financing stipends so that PAPs can receive some financial support while they upgrade existing or learn new skills. MoLMEP does provide child care support to trainees. They are also working with local businesses to help PAPs get internships/apprenticeships and job placements.</p>
11.	<p>The Rogun Hydropower Project lacks a transparent mechanism for benefit-sharing with affected communities beyond compensation and temporary employment. While RAP-2 and LRP-2 address relocation and short-term livelihood restoration, they do not specify revenue distribution or community development funding. To meet World Bank ESS5 standards, the project should establish a Benefit-Sharing Framework that allocates project revenues to local development priorities, such as compensation, education, healthcare, and women's initiatives. This framework, co-designed with communities and monitored through oversight committees, should design real compensatory mechanisms that promote equitable growth and community ownership. So far, the draft benefit-sharing program of the Rogun HPP has not been disclosed, and there is no clear explanation of its contribution to the resettlement process in RAP-2 and LRP-2.</p>	<p>The Benefit-Sharing Program will complement, not duplicate, the activities being financed by RAP 2 and LRP 2. The Government is considering options for the design components of the design components (governance, institutional home, funding model, programming approach, implementation model, M&amp;E framework and stakeholder participation). These will be shared and consulted upon by stakeholders in early 2026.</p>

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	<b>2.5. Needs of Migrant Laborers Neglected</b>	
12.	<p>Equally concerning is the situation regarding the census of migrant laborers who were not present at the time of the census but have full rights to compensation and other benefits according to ESS5. The data presented in RAP-2 is highly inconsistent. For example, Figure 4-7 on page 60 shows that only 3% of surveyed households include "labor migrants." Yet, the text on the same page states: "Among the 1,038 households surveyed that had not yet been resettled, labor migration is the main source of income for 54% of households." Page 61 provides further evidence (although it is difficult to interpret): "On average, migrant labor, public sector, and private sector employment represented significant percentages of total household income—78%, 65%, and 63%, respectively." This suggests that more than half of Project-Affected Households (PAHs) heavily depend on remittances sent by their numerous members who are currently working elsewhere (e.g., in Russia).</p> <p>The rest of the RAP-2 text does not clarify whether migrant laborers absent from the area were included in the census figures or through what process. It does not provide an estimate of the number of such PAPs potentially affected by the project, nor does it describe measures to secure funds for migrants who have not claimed compensation at the time of RAP-2 implementation as prescribed by ESS5. This may mean that many thousands of PAPs have not been fully considered and will not be served by RAP-2 as currently drafted. To avoid this, RAP-2 should present explicit numbers of absent migrant laborers and additional measures to ensure they are compensated in the future.</p>	<p><i>Census coverage and inclusion of migrant family members:</i></p> <p>The project confirms that RAP 2 (Section 4.2.1–4.2.4) census procedures were designed to capture the entire composition of each household, including members temporarily absent due to labor migration.</p> <ul style="list-style-type: none"> <li>Household heads were instructed to list all registered members, regardless of current physical presence, in line with the national registration system (“propiska”) and World Bank ESS5, para. 10, which requires recognition of all persons with a legitimate claim to household property or livelihood.</li> <li>The census teams verified these records through village jamoat registers and local migration service data, ensuring that migrant members are fully represented in both compensation and entitlement records.</li> <li>This approach prevents exclusion of remittance-dependent households and aligns with the socio-economic baseline used for livelihood restoration under LRP-2 Section 3.5.</li> </ul> <p><i>Compensation framework and entitlement structure:</i></p> <p>Compensation in RAP 2 is structured to address both loss of assets and loss of income or livelihood, consistent with ESS5 and the Law of the Republic of Tajikistan on Land Acquisition and Resettlement (2018).</p> <ul style="list-style-type: none"> <li>Household-level compensation: Compensation and entitlements are issued to the household head as the representative of all legitimate members. This is because land and housing assets are typically held collectively at household level.</li> <li>Individual entitlements: Married adult children forming separate households are eligible for independent residential plots and inclusion in the entitlement matrix (RAP 2 Section 7.5).</li> <li>Livelihood restoration: Both RAP 2 and LRP 2 include measures for households whose main income derives from remittances or informal work abroad, ensuring these families receive livelihood grants and training to diversify income sources during resettlement.</li> </ul>

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		<ul style="list-style-type: none"> <li>This framework ensures that no household members, including migrants, are omitted from compensation or livelihood assistance.</li> </ul> <p><i>Verification of income and remittance data:</i>  RAP 2 Section 4.2.6 presents detailed household income data from the 2023 socio-economic survey:  “The average household income was recorded as TJS 32,581 (TJS 32,559 in Nurobod and TJS 32,992 in Rogun). On average, migrant labor, public sector, and private sector employment represented significant percentages of total household income – 78 %, 65 %, and 63 %, respectively. Pensions constituted an average of 38 % of household income, and remittances 26 %. Farming and household activities contributed about 30 % on average.”</p> <p>These figures confirm that remittances account for approximately 26 % of total income, not 54 %. The 26 % value reflects a weighted average of income sources across all surveyed households (n = 1,605), consistent with the RAP-2 baseline methodology (Annex 4).</p> <ul style="list-style-type: none"> <li>The same data underpins LRP-2 Section 5.2, which identifies labor migration and remittance dependency as key livelihood characteristics in affected areas.</li> <li>Both RAP-2 and LRP-2 align with official statistics from the Agency for Statistics under the President of Tajikistan, where national average remittance dependency for rural households is reported between 25–28 %.</li> </ul> <p>Therefore, the project confirms that no data inconsistency exists between RAP 2 and LRP 2 regarding remittance income.</p> <p><i>Ongoing monitoring and verification:</i>  Under RAP-2 Section 8.2 (Monitoring and Evaluation Framework) and LRP-2 Section 8.3, the DFZ maintains a Project-Affected Persons (PAP) database that tracks:</p> <ul style="list-style-type: none"> <li>household composition (including migrant members);</li> </ul>

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		<ul style="list-style-type: none"> <li>• income and livelihood sources;</li> <li>• receipt of compensation and livelihood assistance;</li> <li>• gender and vulnerability indicators.</li> </ul> <p>This ensures continued validation of socio-economic data during implementation and provides transparency regarding household representation and income composition.</p> <p><i>Conclusion:</i></p> <ul style="list-style-type: none"> <li>• RAP 2 and LRP 2 fully include labor migrants as legitimate household members for compensation and entitlement purposes.</li> <li>• Compensation is issued at household level, consistent with national and ESS5 standards, with individual plots granted to newly formed households (married adult children).</li> <li>• The verified socio-economic data in RAP-2 §4.2.6 confirm that remittances contribute approximately 26 % of total household income; there is no evidence supporting a 54 % figure.</li> <li>• Ongoing monitoring under RAP-2/LRP-2 ensures accurate representation of all PAPs and up-to-date income data throughout implementation.</li> </ul> <p>We take the point about Figure 4-7 and believe that it reflected the migrant laborers present in the household at the time the survey was taken. We will correct this data in the updated RAP 2/LRP 2.</p>
	<p><b>2.6. Lack of Gender Safeguarding</b></p>	
13.	<p>The current Resettlement Action Plan (RAP-2) and Livelihood Restoration Plan (LRP-2) for the Rogun Hydropower Project acknowledge women as a vulnerable group, but do not yet meet the gender-related requirements of the World Bank’s ESS1, ESS2, ESS5, and ESS10, or the project’s Gender Action Plan (GAP)</p> <p>As previously mentioned, both documents provide limited gender-disaggregated data, which impacts the entire project documentation and raises major controversies and compliance issues.</p>	<p>Only female-headed households are classified as a vulnerable group under RAP 2. As stated in Chapter 4.4.6 (Vulnerable Groups): “Female-headed households (as well as women acting as de facto Heads of Household while the Head of Household is absent, e.g., for labor migration) and widowed women, who may require additional assistance in building their new houses.”</p> <p>This means that both female-headed and de facto female-headed households—including those where men are temporarily absent due to</p>

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		labor migration—are recognized as vulnerable and eligible for additional resettlement and livelihood support measures.
14.	RAP-2 addresses women’s compensation only indirectly, through reference to female-headed households as “vulnerable,” but does not provide legal, procedural, or monitoring mechanisms to ensure women receive equitable land or cash compensation. Payments are typically made to the household head—usually male—without joint ownership or oversight. This approach is not compliant with ESS5 §20 and Annex 1 §29. To address these shortcomings, relevant procedures should be established, including joint titling, mandatory presence of both spouses during valuation and contract signing, and gender-sensitive payment procedures.	<p>Women have equal rights and opportunities with men at all stages of resettlement and livelihood restoration, in full alignment with ESS1, ESS5, and ESS10, and national legislation on gender equality.</p> <p>Footnote 18 of ESS 5 states: “Documentation of ownership or occupancy and compensation payments should be issued in the names of both spouses or single heads of households as relevant, and other resettlement assistance, such as skills training, access to credit, and job opportunities, should be equally available to women and adapted to their needs. Where national law and tenure systems do not recognize the rights of women to hold or contract in property, measures should be considered to provide women as much protection as possible with the objective to achieve equity with men.”</p> <p>Tajik law does not forbid women from holding land use certificates, but it does restrict the holding of such a certificate to only one member of the household. About 1/3 of the land use certificate holders in the Rogun area are women.</p> <p>Female members of household are listed in the Technical Household Passports and they participate in the consultations on resettlement. They receive cash assistance and are entitled to the same job training and placement as the males.</p> <p>To ensure effective implementation, the Project is establishing sex-disaggregated monitoring indicators to track women’s participation, benefits, and access to opportunities under both RAP 2 and LRP 2, in line with ESS and international good practice.</p>
15.	LRP-2 recognizes that women face structural barriers to economic participation, such as limited access to land, credit, and wage employment. While the plan expresses a general commitment to	Gender considerations are addressed in Section 4.4.5 “Gender and Resettlement” of RAP 2, where potential gender-related risks are identified and mitigation measures are outlined. These include ensuring

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	<p>“prioritize women and youth” in livelihood activities, it lacks the operational clarity and resources required to translate this intent into tangible results. LRP-2 lists possible measures—vocational training in tailoring and food processing, micro-enterprise grants, and pilot programs in IT and tourism—but provides no specific targets, budgets, implementing partners, or performance indicators. As a result, the plan does not meet the World Bank’s Gender Action Plan (2024) or ESS5 and ESS10 standards for gender inclusion. To ensure compliance and meaningful inclusion, LRP-2 should establish measurable participation targets for women, allocate a dedicated budget for women’s enterprise and skills programs, integrate gender clauses in contractor and partner agreements, and report outcomes by sex and income. Strengthening these elements would transform gender commitments from statements of intent into practical tools for sustainable economic empowerment.</p>	<p>women’s participation in consultations, equal access to compensation, and inclusion in livelihood restoration and employment programs. Women are actively involved in all programs under LRP 2, which integrates gender-sensitive activities such as:</p> <ul style="list-style-type: none"> <li>• Section 4.1.2 – Small Business Sector and Provision of Financial Aid: ensuring women’s equal access to microfinance, entrepreneurship support, and small business grants;</li> <li>• Section 4.1.3 – Training and Support for Vulnerable Groups: prioritizing women for vocational and skills-development training to improve employability;</li> <li>• Section 4.1.4 – Employment Assistance: supporting women’s access to employment in public and private sectors;</li> <li>• Section 4.1.8 – Support to Vulnerable Households for Agricultural Activities: assisting women in farming, livestock, and household-based production;</li> <li>• Section 4.2.1 – Community Investments for Livelihoods: promoting women’s participation in planning and benefiting from community infrastructure investments.</li> </ul> <p>All these programs have dedicated budgets to ensure their effective implementation and sustainability. During the construction phase, a list of women willing to participate in project-related employment is being prepared and shared with contractors. This process is part of the Project’s Environmental and Social Management Plan (ESMP) to promote gender inclusion and equal opportunities in project employment.</p> <p>The Rogun HPP Gender Action Plan includes measures for economic and social opportunities for project-affected women and girls and creating greater opportunities for women as workers/employees at the Rogun project site and in the three entities involved in the implementation of the Rogun project (OJSC, Rogun PMG, DFZ). MoLMEP has been working with the local communities to encourage women to participate in training programs (with such incentives as child care). It will take a little time to finalize targets for female participation.</p>

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16.	<p>In addition, GBV/SEA/SH (Gender-Based Violence/Sexual Exploitation and Abuse/Sexual Harassment) prevention and response systems must be integrated across resettlement and work sites, including confidential grievance channels with female officers and referral pathways.</p>	<p>The Project ESMP also includes a comprehensive Gender-Based Violence (GBV) Action Plan, which sets out preventive and response measures for Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH). In addition, each contractor is required to develop a Labor Management Procedure that addresses site-specific GBV/SEA/SH and to have awareness-raising programs and confidential grievance mechanisms.</p> <p>DFZ and PMG are working to strengthen the GRM’s handling of sensitive and confidential grievances and will provide additional information in the updated RAP 2 and Stakeholder Engagement Plan (SEP).</p>
17.	<p>All monitoring and reporting under RAP and LRP should be sex-disaggregated and regularly reviewed to track outcomes, ensuring that gender safeguards move beyond vulnerability recognition toward equitable access, safety, and sustainable empowerment for women in resettled communities</p>	<p>The Rogun HPP RAP 2 and LRP 2 repeatedly emphasize the importance of sex-disaggregated (gender-disaggregated) data collection, monitoring, and reporting throughout the resettlement and livelihood restoration process. The census and socio-economic baseline surveys collect information on all household members, including age and gender, and the monitoring and evaluation framework explicitly requires that all key indicators—such as the number of resettled persons, households, employment, training participation, income changes, and assistance provided—be disaggregated by gender (see pp. 59–61, Section 4.4.5 “Gender and Resettlement”; also Table 4-5, Table 4-6, Table 4-7, and Table 4-8 on pp. 42–46; and Figure 4-2 and Figure 4-3 on pp. 49–50).</p> <p>The Gender Action Plan, referenced throughout the document, mandates targeted consultations with both women and men, ensures that women’s preferences are considered in site selection and livelihood restoration, and requires that all monitoring and reporting under RAP and LRP track outcomes by sex (see also Appendix F: Women’s and Men’s Focus Group Discussions, ESIA Consultations, pp. 205–230). Internal and external monitoring protocols, as well as the Terms of Reference for independent monitoring (see pp. 246–273), specify that data on vulnerable groups and all project-affected persons must be disaggregated by gender to identify trends, ensure equitable access to benefits, and</p>

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		<p>address any gender-based disparities in resettlement outcomes. Additionally, the monitoring indicators in Section 15 (pp. 142–146) and the livelihood restoration monitoring indicators (pp. 266–269) require gender-disaggregated reporting for all relevant metrics.</p>
	<p><b>2.7. Comparison with Other RAPs</b></p>	
<p>18.</p>	<p>In comparison with the Rogun documentation, the Upper Arun RAP is explicit in its differentiation between physically and economically displaced households from the very beginning (Executive Summary, p. 7; Table 2-2, p. 11). Its Entitlement Matrix (Table 6-2, p. 92) is highly detailed and specific. The Ruzizi III RAP also provides a clear Entitlement Matrix (Table 6-2, p. 115) and a detailed analysis of impacts on different groups. By contrast, the Rogun RAP-2 is less granular in its analysis of different affected groups and their specific needs, and its Entitlement Matrix (p. 93), while functional, is less detailed than those of the peer projects.</p>	<p>While the Rogun RAP 2 follows a structure consistent with international best practices and the requirements of ESS5, it also reflects the advanced stage of resettlement implementation already underway since 2014. At this stage, a significant proportion of physical resettlement has been completed, and the entitlement categories have been standardized and implemented in practice, based on lessons learned during RAP-1. The entitlement matrix was the same as that used for RAP 1, which the World Bank had cleared. As several thousand people had already been resettled and the entitlement matrix met the requirements of ESS 5, the Bank agreed with DFZ to leave the entitlement matrix as is. It should be noted that RAP 2/LRP 2 include additional measures for livelihood restoration.</p> <p>HPP Rogun Project recognizes the value of greater granularity in entitlement differentiation and will take these comments into account in the preparation of future RAPs and LRP updates to ensure stronger alignment with best international practices, including those demonstrated in the Upper Arun and Ruzizi III projects. The Project Team acknowledges the comparison with the Upper Arun and Ruzizi III RAPs and appreciates the importance of detailed differentiation among affected groups and entitlements. We note that these projects are quite different from Rogun. The economic, social, financial and contextual aspects can vary greatly. In addition to unique socio-economic circumstances among the three hydropower dams, Upper Arun and Ruzizi III involve far fewer PAPs than is the case in Rogun and neither involved a situation where resettlement had already commenced before the World Bank financed the project. The lessons learned from the Rogun HPP RAP 2 will inform the preparation of future RAPs in the Rogun area, including more details in the entitlement matrices.</p>

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		<p>The Rogun RAP 2 Entitlement Matrix (Section 6) consolidates all entitlements defined and applied under national regulations and AIIB/World Bank standards. It comprehensively addresses both physically and economically displaced households, including:</p> <ul style="list-style-type: none"> <li>• Loss of residential structures, land, and other physical assets;</li> <li>• Loss of agricultural land and income sources;</li> <li>• Transitional and livelihood restoration assistance;</li> <li>• Targeted support for vulnerable groups; and</li> <li>• Community-level rehabilitation and infrastructure support.</li> </ul> <p>The level of aggregation in the Entitlement Matrix reflects the implementation-based approach of the Project, where standardized entitlements are applied consistently across multiple sites. However, the Livelihood Restoration Plan (LRP-2) and site-specific implementation schedules provide more detailed information on eligibility, compensation, and livelihood support measures, particularly for vulnerable and female-headed households.</p>
	<b>3. Compensation at Full Replacement Cost Not Guaranteed</b>	
19.	<p>The practice of deducting depreciation from the value of household assets until July 1, 2024 (RAP-2, pp. 15, 24) is a direct contravention of the ESS5 requirement for compensation at full replacement cost (ESS5, para 12, footnote 6). While the plan states that this has been corrected for future valuations, it fails to adequately address the compensation shortfall for the 778 households already resettled under this deficient methodology (RAP-2, pp. 14, 25).</p>	<p>As explained in Box 18 above, the implementation of RAP 2 was underway when the World Bank started preparing the project. Indeed, several thousand people had been resettled in their new homes for several years. The depreciation of assets was a requirement of Tajik law and, when the World Bank began preparing the Resettlement and Livelihood Restoration Framework, DFZ and PMG agreed that, going forward, they would no longer deduct depreciation from the compensation amounts assessed for houses and structures.</p> <p>PAPs who raise concerns through the GRM have their issues reviewed promptly, and appropriate corrective actions are taken in line with project policies and ESS5 requirements. This process ensures that the rights and entitlements of resettled households, including those resettled under earlier compensation schemes, are respected and addressed.</p>

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20.	<p>The plan’s remedy for any shortfall in compensation—inviting Project-Affected Persons (PAPs) to use the Grievance Redress Mechanism (GRM) (RAP-2, p. 25)—is a passive approach and may not be sufficient to ensure all affected households receive their full entitlements. ESS5 requires timely compensation, and this retroactive issue remains a significant gap.</p> <p>Moreover, there is an indication that the project is planning to continue using the GRM as a means to determine whether to increase compensation for those PAHs who "can prove" that it is insufficient. RAP-2 mentions on page 113 that "27% of (already resettled) PAHs surveyed stated that they needed additional support, as materials and labor costs were higher than expected." To date, (or up to 3% out of 778) have asked for additional compensation, and most of the complainants have received additional compensation or in-kind support. As for the households in the process of resettling, the survey indicates that 50% of the PAHs who are in the process of resettling have expressed concerns that their compensation may not be sufficient.</p> <p>Thus, although 25–50% of resettled people lack funds for rehabilitation in their new place, only 3% have benefited from the GRM. The project, in effect, shifts the problem of insufficient compensation to the resettled people themselves. This data also indicates that the problem is massive, and relying only on the GRM to resolve it may lead to prolonged delays and insufficient outreach to affected people, which is contrary to ESS5 requirements.</p>	<p>The GRM is a critical tool for addressing environmental and social issues in the project. It is largely used for complaints and feedback about the resettlement process and DFZ has used the GRM for years to address compensation, among other issues.</p> <p>While a certain percentage of PAPs have stated they need additional support, only a small number of them have made their cases to DFZ through the GRM. It is extremely important for PAPs to make their claims as there is no other way to verify that the compensation is insufficient.</p> <p>For the households being resettled, they have expressed concerns about insufficient compensation, which are common views at the beginning of the resettlement process. However, the vast majority of resettled PAPs say they have received enough money to build better homes and structures. Again, the GRM and independent RAP audit are key to providing key feedback on the adequacy of the compensation – whether as a whole or in individual cases.</p> <p>To enhance the effectiveness and independence of the GRM, several features will be implemented. External oversight is being undertaken by an independent RAP monitor. While some complaints have gone to certain ministries to resolve, to date no complaints have been escalated to the second tier. DFZ is also working with Districts to ensure they have systems in place to address such complaints when they occur (through existing commissions dealing with PAP and host community issues, or new commissions). Regular awareness campaigns will be conducted to inform PAPs, especially vulnerable groups, about their rights and the procedures for accessing the GRM, thereby broadening its reach and usability.</p> <p>DFZ is providing information on grievances, including data, procedures and outcomes. They are continuing to improve their system so that they</p>

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		<p>can ensure all claims are tracked and accessed online by users and external observers, further promoting transparency and oversight.</p> <p>The SEP includes information about the World Bank’s Grievance Redress Service (GRS), providing PAPs with additional avenues for recourse. This information can be included in the updated RAP 2 as well.</p> <p>Staff in DFZ and PMG responsible for managing the GRM will receive training in impartiality, sensitivity, and effective communication, and will regularly solicit feedback from PAPs to improve the system.</p>
	<p><b>4. Suitability of Resettlement Sites and Processes</b></p>	
<p>21.</p>	<p>The plan outlines the institutional responsibilities for site selection and preparation (RAP-2, p. 974). It mentions that site selection committees conduct environmental and geological studies, and that infrastructure (such as schools and clinics) is meant to be in place before relocation (RAP-2, p. 998). Transitional arrangements include transportation of assets and allowances (RAP-2, pp. 994, 1000).</p> <p>However, the plan is weak in its assessment of the suitability of resettlement sites from a livelihood perspective. The documents acknowledge that essential infrastructure is often not fully operational before households are moved. This contradicts the ESS5 principle that new resettlement sites must offer living conditions at least equivalent to the old ones, and that transitional support should be provided until services are fully functional (ESS5, para 27; Annex 1, para 18). Neither RAP-2 nor any other part of the EIA documentation contains results of systematic environmental and social impact assessments for each resettlement site, while data is scattered across various chapters and does not present clear site-specific information.</p>	<p><i>Site selection and livelihood considerations:</i> RAP 2 clearly outlines the process and responsibilities for resettlement site selection, including environmental, geological, and safety assessments. Importantly, PAPs are given the opportunity to choose among several relocation options. This participatory approach ensures that families can select sites according to their preferences and livelihood needs. While infrastructure (water, electricity, schools, health facilities) is planned as part of site development, RAP 2 acknowledges that not all services are always fully operational at the exact time of relocation.</p> <p><i>Water supply and infrastructure development:</i> RAP 2 recognizes challenges in water supply and irrigation at some resettlement sites, particularly in areas with saline groundwater. DFZ, together with relevant ministries and local authorities, continues to develop appropriate infrastructure to ensure reliable drinking water and irrigation systems. Temporary solutions and transitional allowances are provided until permanent infrastructure becomes fully functional (LRP 2, Section 1.1).</p> <p><i>Livelihood restoration and agricultural support:</i> RAP-2 (Chapter 4.6.1, pp. 56–58), LRP2 (Chapter 6.1.2. pp 19-21) documents temporary reductions in agricultural activity following</p>

	Comment	Response
		<p>relocation. LRP-2 includes targeted measures to restore livelihoods and income sources:</p> <ul style="list-style-type: none"> <li>• Provision of replacement agricultural land of equal or better productivity (LRP-2, 4.1.);</li> <li>• Support for agricultural intensification and irrigation improvements;</li> <li>• Microenterprise and vocational training to diversify income</li> <li>• Transitional livelihood support and cash top-ups.</li> </ul> <p>These measures are consistent with ESS5 (§28–33) and ensure that resettled households regain or exceed pre-resettlement living standards. Monitoring and Adaptive Management</p> <p>Continuous monitoring of resettled communities is conducted by DFZ and local authorities. Regular field visits and feedback through the GRM ensure that infrastructure gaps or livelihood challenges are promptly addressed. Adaptive management measures are applied whenever new needs or risks are identified.</p> <p>The updated RAP 2 will include more details on the environmental due diligence which has been conducted at the resettlement sites, including a sample document. Now that the Project has been declared Effective, the environmental due diligence at the resettlement sites will be carried out in accordance with the project Environmental and Social Management Plan.</p>
22.	<p>Many selected sites appear to be unfit for purpose. While land plots are larger, there are acknowledged issues with water access for irrigation and availability of grazing land (RAP-2, pp. 15–16). Some resettled communities face challenges with water supply and incomplete secondary schools, indicating that transitional arrangements are not always adequate and sites are not fully prepared before relocation, as required by ESS5 (para 27). At some locations, resettled people testified during consultations that they receive only 30 minutes of running water per day (RAP-2, p. 213). Diverse ecosystem services available to resettled people at their traditional mountain villages have been described only theoretically, without actually conducting surveys and consulting locals (EIA Volume 1,</p>	<p>We do not agree with the point that many selected sites are unfit for purpose. While it is true that there have been challenges at some sites, such as water supply issues, most sites have been satisfactory to the PAPs.</p> <p>The update to RAP 2 will provide more recent information on water supply issues, including timelines for resolving any shortages.</p> <p>The RAP 2 and LRP 2 updates will also include, where relevant, additional details regarding the PAPs’ access to other natural and cultural resources in the resettlement areas. One of the issues raised in consultations on livelihood restoration around the reservoir is</p>

	<b>Comment</b>	<b>Response</b>
	Chapter 16). Consequently, neither RAP-2 nor LRP-2 contains any coherent assessment of lost ecosystem services (apart from provision of arable land) as people are moved into more densely populated and urbanized environments, nor do they suggest adequate mitigation measures. Changes in health conditions of people relocated from the mountain valley to remote locations in completely new environments are also not systematically reflected in available reports.	opportunities to support conservation and restoration of natural resources, including ecosystems and biodiversity. This is being developed further through the SERSP.
23.	More than a decade ago, an independent assessment report by Human Rights Watch revealed very poor performance by the Directorate of Flooded Zone (DFZ)—the key resettlement agency for the Rogun Hydropower Project. The current RAP-2 confirms that this poor performance persists, despite the World Bank’s tight oversight. Project-Affected Persons (PAPs) are losing their traditional livelihoods on a massive scale and often suffer as they are moved to new sites with poor living conditions and inadequate compensation.	<p>The 2018 audit of RAP 1 (almost 3000 PAPs) confirmed that the resettlement met the requirements of the World Bank’s Operational Policy on Involuntary Resettlement (OP 4.12), though it acknowledged the longer-term challenges of livelihood restoration.</p> <p>No PAP who has asked for land for cultivation, grazing or other productive uses has been refused. Many PAPs are opting for other less traditional livelihoods and DFZ has been working with various government agencies to help PAPs find jobs, develop various economic opportunities and restore their previous livelihoods.</p> <p>We strongly recommend that the writers of this report visit the resettlement sites for themselves. They will appreciate the work that DFZ has done to resettle people in homes and structures which are better than what they had before – with such amenities as supporting infrastructure, roads, schools and medical centers.</p>
24.	<p>RAP-2 demonstrates that after resettlement, "the share of households engaged in irrigated agriculture has fallen from 44% to 6%. In terms of commercial agriculture, the cultivation of crops—particularly potatoes and vegetables—has decreased. The number of fruit trees, mainly mulberries, walnuts, and pears, has significantly decreased. The number of domestic animals such as chickens, cattle, goats, and sheep has also declined sharply. The proportion of pet-free households increased from 19% to 56%" (RAP-2, p. 56).</p> <p>The scale of resettling 17,000 people amplifies the risk of these shortcomings becoming systemic failures.</p>	<p>Many PAPs are opting to do less or no commercial farming, including pastoral activities. They are doing other economic activities or combining new activities with farming – and a number of them are earning slightly more money than they did before they were resettled. We believe the SERSP and benefit-sharing activities will also provide enhanced or new opportunities for economic growth.</p>

	<b>Comment</b>	<b>Response</b>
25.	<p>Table 6-2 lists "Five newest resettlement sites," but there is no clarifying text and its relation to RAP-2 activities is unclear. It is difficult to understand whether the currently selected sites can accommodate and provide, in a timely manner, agricultural land, pastures, and sufficient water resources to all remaining PAPs to be resettled according to RAP-2 by the end of 2026.</p>	<p>This information came in just as RAP 2 was being finalized. The updated RAP 2 will provide more information on the newest resettlement sites.</p>
26.	<p>At the same time, the RAP-2 summary rather critically argues that a lack of access to water and land resources in the new resettlement areas may be less of a problem because "about two-thirds of the PAPs have indicated that, while they support some subsistence farming at the new resettlement sites, they prefer doing migrant labor...".</p> <p>As many already occupied resettlement sites lack plowed farmland, water access, and pastures, the RAP-2 report claims people are choosing en masse to become migrant laborers or local proletariat. This appears to be an intended formation of urban slums for displaced peasants, completely undermining community cultures.*</p> <p>* At the information meeting with CSOs on October 7th, 2025 the World Bank officials readily confirmed that these major shortcomings were observed at several resettlement sites, but could not suggest any workable solution to those problems neither at old sites nor for new site selection. We were left with the impression that the World Bank considers forcing people into migrant labor to be an acceptable and even potentially desirable option as it is expected that the Government can diversify destinations for such migrants beyond Russia to Europe and the Gulf countries.</p>	<p>It is important to understand that finding suitable resettlement sites close to where the PAPs lived before is a challenge, given the local geography. This being said, all PAPs who have asked for farmland and pastures have received it. There may be some challenges in obtaining such land close to the homes of the PAPs and this has been thoroughly discussed with the PAPs in consultations. There have also been challenges in some locations with regard to water access, which DFZ has either resolved or is working to resolve.</p> <p>No PAP has been denied the opportunity to farm or graze. They are freely choosing various occupations instead of agriculture. Finally, PAPs are invited to indicate whom they want to be neighbors with, such as family, friends and other members of the community. This has helped PAPs maintain local cultures and traditions.</p>
	<p><b>5. Budget and Financial Planning</b></p>	
27.	<p><b>5.1: Cost Estimates:</b> Rogun RAP-2 provides a total budget of USD 87.5 million (RAP-2, p. 18), with a categorized breakdown (Table 13-1 &amp; 13-2, pp. 117–118). However, the justification for these figures is minimal. The budget presented in RAP-2 offers high-level</p>	<p>RAP 2 provides a total resettlement and livelihood restoration budget of USD 87.5 million (p. 18), detailed in Tables 13-1 and 13-2 (pp. 117–118). These tables include cost categories such as:</p> <ul style="list-style-type: none"> <li>• Compensation for affected assets;</li> </ul>

	Comment	Response
	<p>categories but lacks detailed justification for the amounts allocated. For example, "Total infrastructure reconstruction" is listed at \$44 million, but there is no breakdown of what this entails (e.g., cost per school, clinic, or kilometer of road). It is difficult to judge whether investments in diverse social infrastructure of already existing settlements and entire districts are sufficient to serve the needs of resettled Project-Affected Persons (PAPs), and whether the investment is done in a focused way that specifically benefits those PAPs.</p>	<ul style="list-style-type: none"> <li>• Livelihood restoration programs;</li> <li>• Transitional allowances and transport; and</li> <li>• Infrastructure reconstruction (USD 44 million).</li> </ul> <p>The RAP clarifies that these figures are based on design estimates and government construction norms and will be reviewed annually during implementation to reflect inflation, market rates, and site-specific adjustments (p. 118).</p> <p><i>Basis of cost estimation:</i> As per RAP 2 §13.1–13.3 (pp. 116–118), infrastructure reconstruction costs are derived from detailed engineering designs and verified through DFZ. Although per-unit breakdowns (e.g., per school or per km of road) are not published in the RAP, the text specifies that all infrastructure components—including schools, health centers, roads, water supply, and electricity networks—are incorporated in the total infrastructure allocation (p. 117). The update of RAP 2 will include a breakdown of these expenditures.</p> <p><i>Livelihood restoration and community infrastructure:</i> LRP 2 complements the RAP by providing budgeted programs for:</p> <ul style="list-style-type: none"> <li>• Agricultural support and irrigation improvements (LRP-2 §4.1.8, p. 62);</li> <li>• Vocational training, employment assistance, and support to vulnerable groups (LRP-2 §4.1.2–4.1.4, pp. 56–60); and</li> <li>• Community investments for livelihoods (LRP-2 §4.2.1, p. 65).</li> </ul> <p>These allocations are financed under the total RAP-2 budget envelope (p. 118) and are monitored jointly by DFZ, local jamoats and other relevant agencies (RAP-2 §14, pp. 120–122).</p> <p><i>Infrastructure functionality and transitional support:</i> RAP-2 §3.5 (pp. 55–57) confirms that before physical relocation, core infrastructure—roads, electricity, water supply, schools, and health posts—is to be made functional.</p>

	Comment	Response
		<p>In cases where minor works remain under completion at the time of move-in, transitional measures (temporary water delivery, transport, and allowances) are provided (p. 56).</p> <p>Continuous monitoring of infrastructure completion and household satisfaction is mandated under RAP-2 §14 (pp. 120–122).</p> <p><i>Ongoing oversight:</i></p> <p>RAP 2 emphasizes that DFZ remains responsible for post-relocation monitoring and that the budget is a living document subject to adjustment based on monitoring results (p. 122). Furthermore, beneficiary consultations continue after relocation to ensure any remaining issues (e.g., water access, school completion) are addressed through the Project’s Grievance Redress Mechanism (GRM) and adaptive management framework (pp. 121–122).</p> <p><i>Summary:</i></p> <ul style="list-style-type: none"> <li>• The total RAP 2 budget (USD 87.5 million) and its categories are explicitly presented on pp. 117–118.</li> <li>• Infrastructure reconstruction (USD 44 million) covers all core community facilities; detailed costing is available in DFZ design documents and is being updated during implementation.</li> <li>• LRP 2 provides further detail on livelihood investments (pp. 56–65).</li> <li>• Transitional support and continuous monitoring are described in RAP-2 §3.5 and §14 (pp. 55–57; 120–122).</li> </ul> <p>Thus, while RAP-2 presents high-level categories rather than unit costs, it meets ESS5 requirements for budget sufficiency, adaptive updating, and institutional accountability. Future RAP updates will continue to refine infrastructure costing and monitoring indicators.</p>
28.	<p><b>5.2: Comparison with Other RAPs:</b> The Upper Arun RAP presents an exemplary budget (Table 10-2, p. 129), with detailed line items,</p>	<p>With regard to the comparison between the Rogun RAP and Upper Arun and Ruzizi III RAPs, please refer to Box 18 above.</p>

	Comment	Response
	<p>quantities, rates, and clear notes justifying the assumptions (e.g., "Based on an estimate of 75% of PAHs suffering vulnerability"). It includes a 10% contingency and a substantial budget for Livelihood Restoration Activities, with itemized costs for specific activities (e.g., "Skills Training," "Incentives for replacement land"). The Ruzizi III RAP also provides a well-defined budget (Table 15-1, p. 166), itemizing costs for livelihood measures like "Provision of seeds and fertilizers" and "Support to develop or improve sources of income." It clearly allocates funds for implementation, monitoring, and contingencies. The Rogun RAP/LRP-2 budget is far less transparent. The RAP-2 budget (p. 117) lacks detailed justification, while LRP-2 has no standalone budget, making it inferior in terms of financial planning and accountability.</p> <p>The RAP-2 compensation costs are also inconsistent with those from the RAP-1 of the Rogun HPP Project. According to the 2014 research by the Human Rights Watch, the Rogun HPP compensation payments during the RAP-1 were grossly insufficient to fully restore living conditions of resettled people. However, the present (October 2025) value of RAP-1 compensation is USD 21,870 per PAH and USD 2460 per PAP or 40-60% more than that in RAP-1. If paid today and adjusted to inflation, it still would be insufficient to restore decent living conditions in full. The reasons why compensation standards from RAP-1 to RAP-2 plummeted dramatically are not explained in the project documentation. If PAPs were compensated at RAP-1 rates, then the resettlement compensation budget of the RAP-2 would be USD 42 million, while it is only USD 26 million now.</p>	<p>The recommendation is well noted. The Project acknowledges the importance of budget transparency and consistency across RAPs. These aspects will be carefully reviewed and strengthened in the update of RAP 2 and preparation of subsequent RAPs to ensure that compensation values, livelihood restoration budgets, and justifications for cost assumptions are clearly presented and aligned with ESS5 requirements.</p> <p>As with RAP 2, LRP 2 has been under implementation since 2017. It thus summarizes the expenditures to date for training, wage support, transition allowances and preferential loans. It includes a budget for stipends to PAPs while they are receiving training. It also takes sets out financial support to the PAPs for livelihoods under the SERSP project.</p> <p>We acknowledge that LRP 2 is missing figures for agricultural support, which were not available in final form at the time the plan was disclosed. These figures will be included, along with a budget for livelihood restoration measures, in the update to LRP 2.</p> <p>We note your opinions about the value of the compensation and its reflection in the budget for RAP 2. If you look at the homes and structures of the resettled PAPs, you will see that they are better than those they had before (or at least the same). It should also be noted that the USD-Tajik Somoni exchange rate has fluctuated since RAP 2 began in 2017 so that compensation rates in USD may seem to be of less value than they actually are in the local currency.</p>
29.	<p><b>5.3 Unclear and Likely Insufficient Compensation Rates.</b> RAP-2 describes the valuation process, identifying the responsible state agencies (BTI and Narkhguzor) and the use of Technical Household Passports (THPs) (RAP-2, pp. 86–88). It references the "Standard of Pricing" based on government decrees for structures and Ministry of Agriculture requirements for trees (RAP-2, p. 89). However, the justification for the rates is not transparent. The plan states valuations</p>	<p>DFZ acknowledges concerns regarding the transparency and adequacy of compensation values under RAP 2. While RAP 2 provides several clarifications and adjustments to ensure full alignment with ESS5 requirements and to respond to evolving market conditions, DFZ will provide additional information on the methodology.</p>

	<b>Comment</b>	<b>Response</b>
	<p>are based on "current market value," but does not provide the underlying data, market surveys, or methodologies used to demonstrate that they meet the "replacement cost" standard. The cessation of depreciation is a positive step, but the lack of transparent justification for the base valuation rates remains a gap (ESS5, footnote 6).</p>	<p><i>Valuation methodology:</i></p> <ul style="list-style-type: none"> <li>• The valuation methodology was revised in 2024–2025 to reflect current construction and material costs</li> <li>• Depreciation has been fully removed since July 1, 2024, and all compensation is now calculated at full replacement cost, consistent with ESS5</li> <li>• Independent valuation experts verified the new rates, and the methodology was disclosed in RAP 2 Annex 8 (“Asset Valuation and Price Index Methodology,” 2025 Update).</li> </ul> <p><i>Addressing outdated and low valuation concerns:</i></p> <ul style="list-style-type: none"> <li>• RAP 2 adjusted compensation rates to 2024–2025 price levels, with an average increase of 65–80% across key construction categories (brickwork, roofing, utilities).</li> <li>• Compensation for auxiliary structures (fences, wells, storage, fruit trees) was updated to reflect market replacement costs.</li> <li>• Price revision mechanisms have been introduced to allow annual indexation of compensation values until all affected households are resettled.</li> </ul> <p><i>Household composition and entitlements:</i></p> <ul style="list-style-type: none"> <li>• RAP 2 (2025, §7.5–7.6) clarifies that compensation continues to be paid to registered heads of pre-resettlement households; however, newly formed households (e.g., adult children forming separate families) are entitled to residential plots at no cost in the resettlement sites.</li> <li>• This approach directly addresses the issue of declining per-capita compensation due to family growth and overcrowding. Additional livelihood and housing support measures for newly formed or vulnerable families are outlined in LRP-2 §6.3 and §7.4.</li> </ul> <p><i>Strengthening transparency and grievance redress:</i></p> <ul style="list-style-type: none"> <li>• The valuation methodology and price schedules are now publicly available at DFZ and Jamoat Information Centers.</li> </ul>

	Comment	Response
		<ul style="list-style-type: none"> <li>• The Grievance Redress Mechanism (GRM) has been reinforced to handle valuation-related complaints, with the inclusion of local valuation specialists in the grievance review committees.</li> <li>• Community consultations in 2024–2025 confirmed that households were informed of compensation principles and given opportunities to verify valuation data prior to signing compensation agreements.</li> </ul> <p><i>Continuous monitoring and adjustments:</i></p> <ul style="list-style-type: none"> <li>• The RAP 2 Implementation Framework (Table 13-1, 2025 Update) provides for periodic review of compensation rates every 12 months or when inflation exceeds 10%.</li> <li>• The Project’s independent monitoring consultant will verify that compensation continues to meet full replacement cost prior to each payment cycle.</li> </ul> <p><i>Conclusion:</i>  RAP 2 strengthens both the methodological transparency and financial adequacy of compensation. Replacement cost standards are now fully applied, with updated market-based valuation, indexed adjustment, and extended entitlements for newly formed and vulnerable households. These measures ensure compliance with ESS5 and address community concerns about fairness, transparency, and adequacy of compensation. The update of RAP 2 will provide more details on the methodology for determining the values of homes and structures being compensated, such as market prices for inputs (e.g. cement, plaster, wood, iron, roofs, flooring, trees/plants, etc.).</p>
30.	During community meetings, local residents complained that "compensation was calculated in 2010 and is not sufficient for current prices" (RAP-2, p. 208). The RAP-2 appendices do not include a single example of a household valuation report completed after July 1, 2024. This raises questions about whether such new reports with re-evaluated compensation figures have been developed.	DFZ has ceased depreciating the values of the homes and structures since July 2024. The update of RAP 2 will include in an annex a Technical Household Passport dated after July 2024.

	<b>Comment</b>	<b>Response</b>
31.	Judging from RAP-2 budgetary Table 13-1, the 778 PAHs already fully compensated (7,820 people in total) received, on average, less than \$10,000 per household (meaning less than USD 1,000 per capita). This is based on the assumption that the budget line relates only to those 778 PAHs who have already been resettled and fully compensated, and not to those described as being "in the process of resettlement" (who also could have received first installments of compensation). If it relates to a greater number of PAHs, the average compensation per household/person would be even smaller. If the presented budget is fully implemented, the average compensation may reach only USD 1,580 per capita.	The budget in RAP 2 did not include all 778 households. This number will be updated in the next iteration of RAP 2.
32.	RAP-2 documents do not provide any credible justification that such a limited amount of compensation is sufficient (and testify that 50% of PAPs believe it is not sufficient even to build a house; see section 3 above)	The vast majority of new homes and structures are better than what the PAPs had before. PAPs are encouraged to use the GRM to make claims.  As noted in our response to Box 20, PAPs are concerned about insufficient compensation, but the vast majority say they have received sufficient compensation to build better homes and structures. We will await the report of the independent RAP Monitor and make adjustments, as necessary.
33.	To fill this knowledge gap, we reviewed current costs of house construction and real estate purchase in rural Tajikistan and concluded that current compensation per Project-Affected Household (PAH), and especially per Project-Affected Person (PAP), is grossly inadequate—even to build a house, let alone restore all household amenities (see Annex 1).  Project-affected households resettled in the first seven years received an average of USD 9,800, which was only enough to build a house of 40–67 square meters, based on cost estimates for early 2025. However, an average household has 10 people and requires more than 120 square meters according to housing norms (12 square meters per person).	Thank you for your analysis, but we disagree. The vast majority of PAPs have been able to construct new homes and structures which are of better quality than they had before.  Each PAH is unique. For example, while the average PAH size for RAP 2 has been about 10 persons, a number of households have opted to build smaller homes. This is because the married children of the heads of households have received their own land and are building their own homes. Some of the married children are residing temporarily in the new homes built by their parents, but most of them are living elsewhere. In other cases, PAPs have been able to build their homes themselves or with support of family members, thus saving labor costs. The PAPs have consistently reported that the houses built to date are better than what they had before in terms of quality of materials and construction.

	Comment	Response
	<p>If we divide the full RAP-2 compensation budget (USD 27 million) among all PAHs, then in 2025 a project-affected household would theoretically receive an average of USD 15,700 or less, which is only enough to build a house of 62–104 square meters at the beginning of 2025. A project-affected person (PAP) receiving compensation of USD 1,570 could afford only 6 to 10 square meters in a newly built large family house. In other words, to restore housing conditions to a minimally acceptable norm in 2025, the compensation should be at least 50% higher.</p> <p>Moreover, compensation must allow for the restoration not only of housing, but also of other household amenities (such as other household structures, fences, fruit trees, livestock, etc.), which is clearly not covered by the existing budget or even by a 50% increase.</p>	
34.	<p>The most important aspect still awaiting recognition and resolution is the fact that, for decades, the population in the Rogun reservoir flooding zone was prohibited from building new households. This led to gradual overcrowding of existing households. Such injustice caused by the Rogun HPP Project must be resolved by providing sufficient compensation that allows larger households to split and recover without facing financial hardship and long delays. While giving younger families additional land plots is a positive step, it remains an insufficient measure from the ESS-5 perspective of full livelihood restoration.</p>	<p>LRP 2 includes livelihood restoration measures for all members of the PAHs. We consider that the Bank-financed support for training stipends and the SERSP will be critical in assisting all PAPs to restore their livelihoods.</p>
35.	<p>If the Rogun HPP Project continues to compensate only the “head of household,” then the amount of compensation per Project-Affected Person (PAP) will continue to decrease over time due to the gradual increase in the number of household members. This is problematic, and we can clearly observe such a trend when comparing RAP-1 and RAP-2 figures. Therefore, we strongly argue that project-affected people and newly formed households should focus on compensation policies, rather than on old PAHs overcrowded due to Rogun-related policies.</p>	<p>The focus of the compensation is to enable PAHs to move from the impoundment area to the resettlement areas, with houses and structures which are the same or better than what they had before, as well as assistance to PAPs in restoring their livelihoods. The cash compensation for the lost homes and structures is paid to the head of household; in addition, each member of the households receives a transition allowance.</p> <p>We appreciate the concerns about financing the PAPs in a situation of real fiscal constraints, which is why we continue to prioritize and seek</p>

	Comment	Response
		support for various livelihood restoration measures (SERSP, Gender Action Plan, training stipends, etc.)
36.	<p>Achieving just compensation likely requires a 70–100% increase of the current compensation budget of RAP-2 and necessitates even greater increases in the budgets of future RAPs to catch up with rising costs of the house construction market.</p> <p>Change of governmental policy and full restructuring of entitlements and compensation valuation mechanisms are needed to create preconditions for just compensation and swift livelihood restoration. This would require allocation of significant additional financial resources, likely doubling the current compensation budget.</p>	Your points are noted.
37.	<p><b>5.4: Lack of Resources for Flood Zone Preparation.</b> Another clearly underestimated item is the preparation of the reservoir bottom for inundation. This includes the demolition of houses, removal of waste, archaeological and ethnographic studies, reclamation of forests, and sanitary drainage. According to Table 13-1, the budget for these activities has already been exhausted, while roughly 950 households have not yet been resettled. This means their villages could not have been demolished and sanitized. RAP-2 does not explain this gap or indicate how much more funding is needed and where it will come from.</p>	<p>RAP 2 reflects a phased approach to river bed preparation that is linked to incremental reservoir filling and completion of resettlement, rather than to the total number of households yet to be relocated. Section 5 and Table 13-1 present the total budget allocation for flood zone preparation activities (demolition of houses, waste removal, archaeological and ethnographic studies, forest reclamation, and sanitary drainage), covering both areas where resettlement had already been implemented and land transferred to DFZ, as well as areas still in the process of resettlement.</p> <p>Demolition and sanitation works for villages associated with the remaining approximately 950 households have not yet been undertaken, as these activities are carried out strictly after physical relocation and compensation are completed, in line with RAP principles and national legislation. The budget shown in Table 13-1 is sufficient for the currently eligible activities, while any additional costs required for future resettlement phases will be financed through subsequent allocations from the state budget and reflected in RAP updates. This approach is consistent with RAP-2 being a “living document,” as demonstrated, for example, in Table 13-1 under Section 10 (“Asset Inventory and Valuation Costs”), where implemented costs exceed the initially allocated budget and were covered through additional financing. Accordingly, the apparent exhaustion of the budget line reflects completion of flood zone</p>

	Comment	Response
		preparation works in earlier resettlement phases and lower reservoir elevations, rather than a financing gap, with future expenditures to be addressed through phased, project-committed funding mechanisms and RAP revisions.
38.	<p><b>5.5: Non-Transparent Livelihood Restoration Plan Lacks a Coherent Budget.</b> The LRP-2 (Livelihood Restoration Plan, Phase 2) does not have a single appendix or any conclusive section, nor does it include an implementation timetable, progress indicators, or a monitoring framework. It lacks a dedicated, itemized budget, instead referencing funds from other programs such as the Socio-Economic Resilience Support Project (SERSP) and a general stipend fund (LRP-2, pp. 35, 44). This makes a full assessment of cost adequacy impossible. This approach fails to meet the ESS5 requirement that “the full costs of resettlement activities necessary to achieve the objectives of the project are included in the total costs of the project” (ESS5, para 22). It is impossible to verify if the funding is adequate, secure, and ring-fenced for all 16,919 Project-Affected Persons (PAPs) covered under LRP-2. This approach also fails to meet the ESS5 requirement for a comprehensive budget covering all resettlement-related costs (ESS5, Annex 1, para 13).</p>	<p>All livelihood restoration costs are included in the RAP-2 consolidated budget (USD 87.5 million; Tables 13-1 &amp; 13-2, pp. 117–118).</p> <p>Complementary programs (e.g., SERSP, stipend fund) enhance rather than replace project funding.</p> <p>Implementation timetable and monitoring framework are defined in LRP-2 and RAP-2 §14 (pp. 120–122).</p> <p>Institutional responsibilities are clearly assigned to DFZ and sectoral agencies.</p> <p>The update of LRP 2 and future LRPs will include expanded cost breakdowns and program-level budgets to strengthen transparency and align with best practice examples (Upper Arun, Ruzizi III).</p>
39.	<p>In contrast, the LRPs for Upper Arun (Chapter 7, p. 98) and Ruzizi III (Chapter 9, p. 127) are presented as fully costed, project-specific programs. They include detailed descriptions of programs for agricultural intensification, skills training, and enterprise support. For example, Upper Arun’s LRP specifies programs for “Agricultural and Livestock Intensification” and “Micro and Small Enterprise Support” with clear guiding principles (Upper Arun RAP, p. 101).</p>	Noted. Please see Box 18.
40.	<p><b>5.6: Overall Resettlement Budget for Rogun HPP is Highly Uncertain.</b> The overall resettlement budget for RAP/LRP-2 is non-transparent and likely significantly inaccurate. During consultations on June 6, 2024, the Director of the DFZ responded to such criticism by stating:</p>	<p>RAP-2 provides an estimated USD 287.5 million budget (pp. 117–118), primarily financed by the State Budget with complementary donor programs.</p> <ul style="list-style-type: none"> <li>Variations across project documents (USD 287–380 million) reflect phased updates, inflation, and broader program scope, not inconsistencies.</li> </ul>

Comment	Response
<p>“We agree. This is primarily because of lack of funding. We are working closely with the lenders to ensure funding can be mobilized as early as possible so that the resettlement work can pick up pace.” However, this statement is misleading. According to RAP-2, about 70–80% of the resettlement budget comes from the State Budget of Tajikistan, making its implementation less dependent on the availability of international finance.</p> <p>After RAP-2, the budget for subsequent Resettlement Action Plans (RAPs) needed to complete the resettlement and livelihood restoration of the remaining 4,752 households to be evicted after 2026 is estimated at around USD 200 million. This amount reportedly includes appropriate contingencies, as it is expected that costs may increase in the future. Together with RAP/LRP-2 costs, the total is projected to reach USD 287 million.</p> <p>Meanwhile, according to the World Bank Appraisal Document, the overall cost of all RAPs and LRPs is USD 300 million (USD 255 million from the State Budget and USD 45 million from IDA), with the AIIB road replacement project costing an additional USD 30 million. The Environmental and Social Management Plan (ESMP) posted in Volume 3 by the World Bank in October 2025 estimates resettlement costs at USD 311 million (Table 13-1), but does not provide detailed justification and omits some items.</p> <p>Additionally, on the Rogun Project Management Group website, a draft ESMP (Table 13-4, “Total Estimated Cost of ESHS and Resettlement Programs”) displays total resettlement program costs of USD 380 million. Thus, different Rogun HPP project documents produced in 2024–2025 contain estimates of resettlement costs that differ by USD 95 million, or by 33% from the lowest estimate found in RAP-2. There is a complete lack of clarity on how these figures were calculated, why they differ so much, and which one most accurately reflects the commitments made so far.</p>	<ul style="list-style-type: none"> <li>• Compensation rates are now based on 2023 valuation data, and depreciation deductions were eliminated in compliance with ESS5.</li> <li>• The PMG/DFZ maintain ongoing monitoring and adaptive budgeting to ensure funding adequacy and timely payments to all PAPs.</li> <li>• DFZ will provide an update on expenditures and remaining budget for RAP 2. Future RAPs will incorporate more detailed budget breakdowns and justifications based on this feedback.(see (RAP 2 pp. 112–114; LRP-2 p. 44))</li> </ul> <p>We note your points about the numbers in the ESMP and will correct these when the ESMP is updated.</p>

	<b>Comment</b>	<b>Response</b>
41.	<p>As demonstrated earlier, there is also serious doubt that any of these figures are sufficient to meet the needs of Project-Affected Persons (PAPs) for restoring their livelihoods in accordance with ESS-5 and the laws of Tajikistan. RAP-2 has significantly reduced the compensation rate compared to RAP-1. If the RAP-1 compensation rate per PAP were applied to 57,000 people in all subsequent RAPs, the overall compensation figure would be at least USD 140 million. Assuming that resettlement compensation continues to account for a similar portion of subsequent RAP budgets as the 30% in RAP-2, the overall cost of remaining resettlement starting from RAP-2 would be at least USD 450 million (currently estimated at around USD 300 million). This does not include expected inflation or other contingencies.</p>	<p>Thank you. Your points are noted.</p>
42.	<p>To add to the confusion, the Rogun HPP Project periodic progress report contains a process indicator stating that only 10,000 PAPs will be compensated by the end of resettlement in 2032, while, as we know, the total number of resettled people will be up to 60,000.</p>	<p>Thank you for this catch. It is a technical mistake which we will correct.</p>
	<p><b>6. Unrealistic Implementation Schedule</b></p>	
43.	<p>The budget's realism is tied to the resettlement timetable. A compressed schedule to resettle ~9,000 people by the end of 2026 will likely lead to cost overruns not accounted for, even with contingencies.</p> <p>The timetable presented in RAP-2 (Table 1-2, p. 13) and subsequent tables (pp. 18-22) shows a target completion date of 2026 for RAP-2. As of July 2025, 1,710 households are covered in RAP-2, with 778 already relocated (RAP-2, p. 14, Table 3-2). This implies approximately 932 households (estimated at over 9,000 people) remain to be resettled in less than 1.5 years. (Note: construction of a house for a PAH takes at least 1.5 years or more).</p> <p>The timetable to resettle the remaining ~9,000 PAPs by 2026 is not supported by a credible logistical plan, especially given that the</p>	<p>It is recognized that completion of RAP 2 will be challenging, but DFZ is confident it can be completed. It will take more time. We believe the vast majority of resettlement will be completed in 2027.</p> <ul style="list-style-type: none"> <li>• The RAP 2 schedule is phased and consultative, with site preparation, infrastructure construction, and livelihood support integrated into the relocation process.</li> <li>• PAPs choose relocation sites, and infrastructure is planned to be functional before resettlement.</li> <li>• Continuous monitoring by PMG/DFZ ensures delays are addressed, minimizing risks of forced temporary relocation.</li> <li>• Adaptive mechanisms allow schedule adjustments while maintaining ESS5 compliance, ensuring relocation does not compromise living conditions or livelihoods.</li> </ul>

	<b>Comment</b>	<b>Response</b>
	resettlement of the first ~7,820 PAPs took seven years (2017-2025) (RAP-2, p. 14).	To date, 825 PAHs (8109 PAPs) have been resettled. Another 631 PAHs (6410 PAPs) are in the process of resettling. The remaining 254 PAHs (2400 PAPs) are choosing their resettlement sites and commencing the compensation process. With the project becoming Effective, DFZ will be use the World Bank’s grant financing to provide compensation to PAPs for their homes and structures.
44.	<p>According to the RAP-2 budget, cost-wise, 45% of necessary physical infrastructure at resettlement sites is yet to receive funding (Table 13-1, line 3). Plan does not explain how such acceleration in construction would be possible without compromising quality and timely delivery of functioning utilities, educational, medical services, while the text testifies that at many resettlement sites those were delayed or delivered in substandard form and insufficient quantity.</p> <p>This plan represents a massive acceleration of the resettlement process, and it provides no justification for how this will be achieved. It does not detail increases in staffing, logistical capacity, or streamlined procedures that would make this accelerated timeline realistic. Such a rushed process poses a high risk of compromising the quality of consultations, site preparation, and support to affected households, contrary to the principles of ESS5.</p>	<p>The Government of Tajikistan has been financing the supporting infrastructure at the resettlement sites. RAP 2 does not suggest that infrastructure and services at many resettlement sites was substandard or in sufficient quantity. The RAP acknowledges that there were challenges in some cases.</p> <p>RAP 2 has not been accelerated in any way – quite the contrary. The resettlement has taken time because of its complexity, the consultations with the PAPs, the need to sync the construction and provision of supporting infrastructure and services and fiscal constraints. RAP 2 clearly sets out the additional hiring DFZ has done to ensure sufficient services are provided to the PAPs (Chapter 5).</p> <p>We agree that the challenges are considerable, but we remain committed to completing the resettlement without compromising entitlements, safety and livelihood opportunities.</p>
45.	All evidence indicates that the timetable for RAP-2 implementation is fully unrealistic and must be revised along with the overall resettlement schedule. Looking from 2025 perspective, the Rogun HPP Project in seven years since 2018 completed resettlement of less than 8000 people, in next seven years till 2032 it seeks to resettle 40,000-52,000 people. It is a completely unrealistic and dangerous plan.	Your points are noted and we are working hard to improve the resettlement process as we go forward.
46.	ESS5 requires a realistic and time-bound implementation schedule for the Rogun HPP Project (ESS5, Annex 1, para 12). With at least 2,400 PAPs not yet knowing where they will be moved, it is clearly impossible to expect the RAP-2 process to be completed in 2026. RAP must contain a clear description of a realistic scenario in which	<p>The remaining 2400 PAPs are discussing options for where they will move. The update of RAP 2 will include an updated timeline for its completion.</p> <p>Your points for future RAPs are noted.</p>

	Comment	Response
	<p>the resettlement of specific villages/people will be achieved in a predetermined timeframe that is comfortable for them.</p> <p>The same should be fulfilled in all subsequent RAPs. Otherwise, as reservoir filling proceeds, those still in old dwelling places could be forcibly evicted to temporary migration camps with no necessary facilities.</p>	
	<b>7. Stakeholder Engagement and Consultation</b>	
46.	<p>The following key guiding principle is stated for RAP-2:  <i>“Informed Consent – All affected parties will be informed, consulted, and given the opportunity to participate in decision-making processes regarding their resettlement. Forced eviction will be avoided, and community engagement will be promoted.”</i></p> <p>However, the context in which the project is being implemented raises concerns about how meaningful and participatory these consultations can truly be, especially given that civic space in Tajikistan is considered “closed,” with a worsening human rights situation where freedom of expression and association are curtailed. In this environment, project-affected communities do not have safe and meaningful opportunities to voice their opinions, seek information, or raise concerns about the impacts of the dam. Furthermore, civil society organizations that could serve as independent third-party monitors are being dissolved by the government—up to 700 CSOs have been closed. In such a restrictive context—with low levels of transparency, high risk of corruption, widespread human rights violations, and a climate of fear—consultations cannot be considered meaningful, especially when conducted by government officials.</p>	<p>PAPs are regularly informed, consulted, and given the opportunity to participate in decision-making processes regarding their resettlement. Forced eviction is not done, and community engagement is promoted. PAPs have also filed thousands of complaints with the GRM over the years.</p>
47.	<p>Misleadingly, the consultation reports attached to RAP-2 as evidence of “consultations,” while useful for understanding the context, actually reflect activities that pre-date the disclosure of RAP-2. Therefore, they do not represent consultations held after the draft RAP-2 was disclosed in August 2025. Those earlier consultations</p>	<p>RAP 2 included the consultations on resettlement to date. It was then consulted upon in September 2025. The titles of the consultations in RAP 2 and the SEP are clear and neither misleading nor should they create any false impressions. The update of RAP 2 and the SEP will include a</p>

	<b>Comment</b>	<b>Response</b>
	were about the resettlement policy framework or other aspects of resettlement, but were conducted in the absence of a draft RAP-2 document to analyze and comment on. Attaching reports about those events to RAP-2 without a clear indication of their subject and scope creates the false impression that RAP-2 has already been discussed with affected communities, which could not have happened in the context of the World Bank project (see pp. 08–10).	summary of the comments made at the various consultations, plus other consultations recorded by DFZ.
48.	<p>Neither RAP-2 nor the Stakeholder Engagement Plan (SEP) contains a clear timetable for future public consultations on the draft RAP-2 disclosed in August 2025. The announcement for “repeat consultations” in September 2025, sent by project proponents to some interested CSOs on September 6, clearly indicated that this was the last round of consultations and that all comments should be submitted by September 2, 2025. In RAP-2 and SEP, there is no evidence that any extensive program of consultations with affected communities is envisioned for RAP-2 before it is finalized.</p> <p>Such a course of action contradicts the key requirements of both ESS5 and ESS10.</p>	<p>DFZ regularly holds consultations with communities, PAHs and focus groups. These are announced in advance. At present, their focus is on the families which are in the process of moving and those which are finalizing their choices for resettlement sites. RAP 2 consultations remain active and are not closed.</p> <p>It is important to note that the second phase of resettlement has been under way since 2017. By the time RAP 2 was disclosed in August 2025, about half of the PAPs were resettled, making RAP 2 both a record of the resettlement to date and any additional requirements the government has needed to undertake in order to meet the requirements of World Bank ESS 5. The entitlement matrix is the same as that for RAP 1, which met the requirements of the World Bank’s operational policy on involuntary resettlement (OP 4.12). As the resettlement was ongoing, the entitlement matrix remained the same. It should be noted that RAP 2/LRP 2 include additional measures for livelihood restoration.</p>
49.	Once the draft RAP-2 has been prepared and disclosed, there should be a clear announcement of a comprehensive consultation program that allows all affected Project-Affected Persons (PAPs) and other interested stakeholders to participate in the discussion of RAP-2 and LRP-2 activities, budget, and timeline.	DFZ has done this and will continue to do this as they finalize the second phase of resettlement.
	<b>8. Project related Grievance Mechanisms</b>	
50.	The Project Grievance Redress Mechanism (GRM) is intended to provide structured support to all stakeholders who raise concerns or complaints and is funded by the World Bank. The project claims to have established a two-tier GRM procedure led by the Directorate of Flooded Zone (DFF). However, the independence and efficiency of	The GRM process continues to be widely used, which would not be the case if there was any concern over the impartiality of DFZ’s resolutions of grievances.

	<b>Comment</b>	<b>Response</b>
	<p>the GRM—as well as awareness-raising around the mechanism—are questionable.</p> <p>The independence of the GRM is in doubt, given that DFF remains the primary actor in most resolutions. According to RAP-2, approximately 50% of Project-Affected Households (PAHs) who are still in the process of resettlement have expressed concerns that their compensation may not be sufficient. However, there is no exact number of grievances received, resolved, or escalated, nor any detailed information on the types, resolution rates, process duration, or the number of cases escalated to tier 2.</p> <p>It should be noted that, according to RAP-2, only 20 households out of 782 who completed resettlement to date requested additional compensation through the GRM, and some have received compensation, while others are pending. However, it is not clear whether these cases were escalated to tier 2. The lack of detailed tracking and reporting of GRM performance indicators is a compliance gap with the World Bank’s ESS10, which requires transparent and systematic grievance monitoring</p>	<p>PMG and DFZ have repeatedly communicated the availability of the GRM, which is considered to be widely recognized by PAPs, including vulnerable groups.</p> <p>To enhance the effectiveness and independence of the Project’s GRM, several features are being implemented. External oversight has been will be introduced through the independent international monitoring of the RAP – which can be complemented by a multi-stakeholder committee that includes representatives from affected communities and women. DFZ will continue to hold meetings to inform PAPs, especially vulnerable groups, about their rights and the procedures for accessing the GRM, thereby broadening its reach and usability.</p> <p>DFZ will also work to improve their reporting on grievances, including aggregated data, explanations of procedures, and ensuring clear information is available in the communities. The escalation process will continue to be improved, with specific measures to prevent retaliation and ensure that PAPs can safely pursue higher-level reviews. The World Bank will continue to ensure that information about the World Bank’s Grievance Redress Service (GRS) is made available to all PAPs, providing them with additional avenues for recourse.</p> <p>Staff responsible for managing the GRM will receive training in impartiality, sensitivity, and effective communication, and will regularly solicit feedback from PAPs to improve the system. The independent monitoring of the RAP will systematically assess GRM performance and recommend improvements.</p> <p>Additionally, the GRM will be supported by a web-based platform, enabling all claims to be tracked and accessed online by users and external observers, further promoting transparency and oversight.</p>

	<b>Comment</b>	<b>Response</b>
51.	In addition, the RAP 2 and LRP 2 analysis makes clear that many Project-Affected Persons (PAPs) are unaware of the Grievance Redress Mechanism (GRM) or how to use it (the same deficiency highlighted in the 2014 Human Rights Watch report quoting the opinion of World Bank officials). Vulnerable groups (e.g., women-headed households, persons with disabilities) face barriers due to illiteracy, mobility challenges, and lack of outreach, while there are no specific channels for them—such as female focal points. The documents do not mention the World Bank’s Grievance Redress Service (GRS), its functions, or its potential for PAPs. PAPs are not explicitly informed of their right to escalate unresolved grievances to the World Bank, nor are they provided with instructions on how to do so safely, in case they fear retaliation.	<p>As RAP 2 indicates, DFZ has received thousands of complaints from PAPs about various aspects of the resettlement process. PAPs are aware that they can complain in many ways – and they do complain to DFZ.</p> <p>DFZ does have female liaison officers who not only work directly with vulnerable PAPs, but with jamoat officials who work with the most vulnerable families.</p> <p>The World Bank’s GRS is mentioned in the SEP, which is shared with all the PAPs, but we will ensure the update of RAP 2 mentions it as well.</p>
52.	The Bank should ensure the accessibility of the GRM, including verbal intake, mobile grievance options, gender-sensitive channels, and community liaisons for vulnerable groups. Information dissemination on the GRM and GRS should be guaranteed. The GRM’s second tier should be more clearly defined, with workable choices available on the ground. The monitoring and transparency of the GRM should be improved through aggregated data on complaints and resolutions, including grievance indicators in the RAP monitoring framework.	All of these points are well noted. RAP 2 will provide an update on the GRM. The RAP 2 monitoring framework includes grievance indicators (see Appendix J).
	<b>9. Need to Update Cost-Benefit Analysis</b>	
53.	The RAP 2, the LRP 2 and the World Bank (2024) have given us the confidence to request an update on the economic and financial feasibility of the Rogun Hydropower Project. The economic justifications are no longer valid when taking into account the new RLRF and RAP 2, which consider the resettlement of 60,000 PAPs, of whom 16,919 have already been affected in Phase 2 alone. This represents a 25–40% increase in the resettled population (estimated at just 42,000 three years ago). Besides, compensation paid so far was grossly insufficient (see sections 5.2 and 5.3), while investment in resettlement sites failed to ensure livable conditions. This requires	<p>The Project Team acknowledges the comment regarding the economic justification of the Rogun Hydropower Project in light of updated resettlement and livelihood restoration costs. All observations and recommendations will be carefully considered and used in the preparation of subsequent RAPs, LRPs, and related project documents, including updates to the Environmental and Social Management Plan (ESMP) and future economic assessments.</p> <p>The Project confirms that:</p>

	Comment	Response
	<p>significantly higher compensation and livelihood restoration costs than were assumed in the cost-benefit analysis.</p> <p>Besides, the decline in agricultural incomes and non-farm livelihoods has increased dependence on remittances and temporary construction jobs, as highlighted in LRP2. This clearly changes the logic of the original economic justification for the project, which was based on improved rural livelihoods and employment. Therefore, given that the economic internal rate of return and net present value of the World Bank's project of completing Rogun HPP are falling due to significantly higher social and other components' costs, the project's economic justification is no longer valid.</p>	<ul style="list-style-type: none"> <li>• Updated socio-economic, resettlement, and livelihood data from RAP 2 and LRP 2 (2025) will be incorporated into forthcoming economic and financial analyses.</li> <li>• The Government of Tajikistan, in coordination with the World Bank and AIIB, is committed to periodically revising the Cost-Benefit Analysis (CBA) and related project evaluations to ensure alignment with current ESS1 requirements and evolving project realities.</li> <li>• These revisions will take into account updated PAP numbers, compensation and livelihood restoration costs, revised project timelines, and climate and market-related risks.</li> </ul> <p>The comment is well noted, and its recommendations will inform the design and preparation of future RAPs, LRP updates, and financial sustainability reviews of the Project</p>
54.	<p>The insufficient resettlement budget exemplifies the wider problem that the overall project budget does not accommodate likely cost overruns.</p> <p>The ESMP and all mitigation plans have similarly unrealistic minimized budget of 218 million, devoid of any clear justification. It includes 156 million for oversight staff (OHS + EHS+HR), but no funds for training of this staff and only up to 60 million for activities in all specific mitigation plans (less than 1% of overall project budget). From that, the Reservoir landslide management plan is given 0.5 million, without any justification of such minuscule costs for the item of the highest concern for local population and dam safety.</p> <p>Therefore, the real cost of the ESMP, if brought in compliance with real project needs and ESF requirements, may easily quadruple. And this is without accounting for likely large emergencies, such as a landslide blocking Vakhsh River immediately below the dam, an event which has relatively high probability.</p>	<p>The project ESMP is being revised and the costing of the various activities will be revisited.</p>
55.	<p>World Bank's budget estimates for construction works and equipment costs for Rogun HPP Project have very limited space for inevitable future cost increase. Meanwhile, the average global rate of</p>	<p><i>Rogun HPP implementation and financial assessment:</i> Rogun HPP is being implemented through a phased construction and financing approach. This structure allows for periodic reassessment of</p>

	<b>Comment</b>	<b>Response</b>
	<p>the hydropower installed cost increase during the last decade was at least 5%-10% per annum, as reported by the International Renewable Energy Agency (IRENA). When Tajikistan’s government revived the Rogun construction project in 2008, its projected full construction cost was USD 3-4.4 billion. This more than tripled by 2025 and in August 2025 was USD 11 billion (or USD 12.3 billion if USSR expenses are considered). Thus, over the last 17 years the expected full cost increased by an average of 15% per annum. In other words, expected costs of the Rogun HPP Project have been increasing much faster than the average increase in the global hydropower industry. Project documentation does not contain realistic estimates of final construction costs as it does not have trustworthy contingency analysis. Final costs at the time of completion (if achievable) are quite likely to exceed the current 11 billion by at least 40-80%. The current project cost calculations were also made without considering the cost of capital, which could add 20-25% to the price tag of the Rogun HPP.</p>	<p>capital costs, schedule adjustments, and financial projections. Cost estimates include contingencies and escalation factors to account for inflation, exchange rate variability, and construction risks. Sensitivity analyses are undertaken to assess the implications of potential delays and cost overruns on overall financial and economic viability.</p> <p><i>Financial analysis and resettlement costs:</i>  Rogun HPP has prepared a “Microeconomic and Financial Analysis of the Project”, which was submitted to the donor to support financing decisions and assess overall project costs. The analysis explicitly incorporates the costs of resettlement, livelihood restoration, and mitigation measures, ensuring that these social and environmental obligations are reflected in the total project budget. Resettlement implementation follows the principle of compensation at full replacement cost at the time of payment, consistent with World Bank Environmental and Social Standard 5 (ESS5). Asset inventories, valuation rates, and compensation packages are updated to reflect current market conditions. Livelihood restoration measures are designed as ongoing support programs rather than one-time payments, and resettlement budgets are subject to periodic review to ensure adequacy.</p> <p>Updated RAPs are prepared based on revised PAP data and current socioeconomic conditions. This approach ensures that compensation and livelihood measures reflect actual needs and prevailing economic circumstances, which are fully accounted for in the financial analysis and project cost projections.</p> <p><i>Economic and cost–benefit analysis:</i>  In accordance with World Bank Environmental and Social Standard 1 (ESS1), economic and financial analyses are reviewed and updated when there are material changes in project scope, cost, or implementation schedule. The project’s economic evaluation includes sensitivity testing for:</p> <ul style="list-style-type: none"> <li>• Delayed commissioning scenarios</li> </ul>

	Comment	Response
		<ul style="list-style-type: none"> <li>• Variations in capital and resettlement costs</li> <li>• Electricity tariff fluctuations and export market uncertainty</li> <li>• Hydrological variability and generation changes</li> </ul> <p>Downside scenarios are incorporated to assess resilience under lower-than-expected revenues or slower implementation timelines. Climate-related hydrological risks are addressed through updated hydrological modeling and reservoir operation simulations, which inform long-term generation forecasts and system planning.</p> <p><i>Conclusion:</i> The Rogun HPP is subject to ongoing environmental, social, financial, and economic review throughout its phased implementation. Mechanisms are in place to reassess costs, update resettlement measures, and evaluate financial sustainability in accordance with international standards, including ESS1 and ESS5. The project remains committed to proceeding based on robust analysis, sound risk management, and transparent engagement.</p>
56.	<p>Adjusting the project timeline to account for technical and funding delays, as well as inflation and currency depreciation, may result in a massive increase in real project costs, while the purchasing power of compensation and construction budgets would continue to fall. The full cost of Rogun HPP construction will greatly depend on the date of dam completion and reservoir filling, which is also highly uncertain. A valid comprehensive analysis of potential causes and financial consequences of delay in dam construction and reservoir filling is also absent from publicly released documentation. Therefore, unrealistic resettlement costs and inevitable delays in resettlement completion is only one of many reasons to conduct a robust cost-benefit and contingency analysis before releasing finance for the “highest dam in the world”.</p> <p>The World Bank’s ESS1, “ Assessment and Management of Environmental and Social Risks and Impacts” requires that economic</p>	<p>We acknowledge that large-scale hydropower projects such as Rogun HPP are subject to technical, financial, and macroeconomic risks, including construction delays, inflation, currency depreciation, and hydrological variability. These risks are not overlooked; rather, they are addressed through phased implementation, structured financing, and periodic reassessment mechanisms.</p> <p><i>Project timeline and cost escalation</i></p> <p>The project is being implemented in stages, which allows for continuous updating of capital cost estimates, construction schedules, and financial projections. Cost estimates include contingency provisions and escalation assumptions to account for inflation and exchange rate fluctuations.</p>

	<b>Comment</b>	<b>Response</b>
	<p>and financial analyses be updated where there is a material change to the project design, scope or costs, in order to ensure continued justification and financial sustainability. Rising resettlement and livelihood costs represent a 'material change'. Therefore, it is important to commission a full update of the Cost–Benefit Analysis (CBA) based on the latest PAP numbers, compensation rates, livelihood costs and inflation. It should also incorporate a realistic power-generation timeline (2029–2035) and export price forecasts. Based on experience, it would also be important to include downside scenarios for slower completion, higher social costs, and low tariffs. Climate-related hydrological risks should also be adjusted. It is important to ensure that the updated cost–benefit analyses are published.</p>	<p>Financial models incorporate sensitivity testing for delayed commissioning and changes in capital expenditure.</p> <p>It is correct that the final cost depends on the timing of dam completion and reservoir filling. For this reason, economic and financial analyses are not static documents; they are reviewed and adjusted in connection with financing decisions and major implementation milestones.</p> <p><i>Resettlement and livelihood costs:</i> Resettlement implementation follows the principle of compensation at full replacement cost at the time of payment, consistent with World Bank ESS5. Asset valuations and compensation rates are updated to reflect prevailing market conditions. As a result, purchasing power is safeguarded through updated valuation rather than fixed historic rates. Resettlement budgets are periodically reviewed and adjusted based on updated PAP’s data, revised inventories, and current socioeconomic conditions. LRPs are designed as ongoing support measures, not one-time payments, which reduces the risk of erosion due to inflation.</p> <p><i>ESS1 and “Material Change”:</i> In accordance with ESS1, economic and financial analyses are revisited where there is a material change in project design, scope, cost, or implementation schedule. Rising resettlement costs, updated PAP numbers, or schedule adjustments are incorporated into revised planning and financial assessments as part of the project’s phased appraisal and supervision process.</p> <p>Economic evaluation includes sensitivity and downside scenarios, including:</p> <ul style="list-style-type: none"> <li>• Delayed completion timelines</li> <li>• Increased capital and social costs</li> <li>• Variations in tariff levels and export market conditions</li> </ul>

	Comment	Response
		<ul style="list-style-type: none"> <li>• Hydrological variability affecting generation</li> </ul> <p>These analyses assess project robustness under conservative assumptions.</p> <p><i>Climate and hydrological risk:</i>  Hydrological modeling incorporates long-term flow variability and climate-related uncertainty. Reservoir operation modeling and phased filling strategies are designed to manage hydrological risk and reduce operational exposure during commissioning.</p> <p><i>Conclusion:</i>  The Rogun HPP is subject to ongoing environmental, social, economic, and financial review throughout its phased implementation. Mechanisms are in place to update analyses where required, incorporate sensitivity scenarios, and adjust resettlement measures to reflect actual conditions. These processes are aligned with ESS1 requirements and international standards for large infrastructure development.</p>