

April 8, 2025

**IPN REQUEST 25/02**

**Inspection Panel Notice of Registration  
on a  
Request for Inspection  
Tajikistan: Sustainable Financing for Rogun Hydropower Project (P181029) and  
Technical Assistance for Financing Framework for Rogun Hydropower Project  
(P178819)**

**Summary**

1. The World Bank<sup>1</sup> Inspection Panel (the “Panel”) received a Request for Inspection (the “Request”) on February 24, 2025, related to the Bank-financed Tajikistan: Sustainable Financing for Rogun Hydropower Project (P181029) and Technical Assistance for Financing Framework for Rogun Hydropower Project (P178819). Both projects are front-loaded to the Rogun Hydropower Program (the “Program”) which envisages a Multiphase Programmatic Approach (MPA) to develop the Rogun Hydropower Plant (HPP) at an estimated cost of US\$ 6.29 billion equivalent with funding from various sources.<sup>2</sup> Unless explicitly stated otherwise, the two mentioned projects are hereafter jointly referred to as the “Project”.

2. The Request was signed by two individuals (the “Requesters”) in Turkmenistan and Uzbekistan, who claim to represent their respective communities in the two riparian countries. The Requesters asked the Panel to keep their identities confidential for fear of retaliation. The Request was submitted by the Civil Society Organization, Rivers without Boundaries Public Fund, which is based in Almaty, Kazakhstan and represents the two Requesters and their respective communities. The Requesters sent a letter to the Panel, explaining that local representation was not feasible, because civil society organizations in Turkmenistan and Uzbekistan fear that retaliation could result from submitting a Request for Inspection to the Panel.<sup>3</sup> The Requesters have authorized the Bank Information Center (Washington, DC, USA), to receive information about the complaint on their behalf, and they have appointed International Rivers (San Francisco, USA) and CEE Bankwatch (Prague, Czechia) to serve as their advisors in the Panel process.

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<sup>1</sup> For the purposes of this Notice, the term “World Bank” or “Bank” refers to the International Development Association (IDA).

<sup>2</sup> The World Bank, [Project Appraisal Document on a Proposed Grant in the Amount of SDR 258.1 Million \(US\\$350 Million Equivalent\) to the Republic of Tajikistan for a Sustainable Financing for Rogun Hydropower Project as Phase 1 of the Multi-phase Programmatic Approach of the Rogun Hydropower Program with an Overall Financing Envelopment of US\\$650 Million Equivalent](#) (“SFRHP PAD”), November 19, 2024, pp 9-12.

<sup>3</sup> The Letter was sent to the Panel separately from the Request and it explains the fear of threats and retaliation in the Requesters respective countries. The Requesters asked the Panel to keep this letter confidential.

3. The Request alleges that the Project is likely to cause wide-ranging socio-economic and ecological harms downstream of Tajikistan’s Vakhsh Hydropower Cascade including in the two riparian countries, Turkmenistan and Uzbekistan. The Request alleges that the Bank did not comply with its Environmental and Social Framework (ESF) and has failed to develop a “robust” Environmental and Social Management Plan (ESMP) and Environmental and Social Commitment Plan (ESCP) for the Rogun Hydropower Plant (HPP). The Request further alleges that the Bank’s “errors and omissions” in the design and implementation of the HPP will likely contribute to ecological harm and associated negative environmental, social and human health impacts for downstream communities. The Request also alleges a lack of meaningful consultation and stakeholder engagement in the two riparian countries.

4. In October 2010, the Panel had also received a Request for Inspection related to the closed Tajikistan: Energy Loss Reduction Project (P089244) which financed studies and provided technical assistance to assess the feasibility of the Rogun HPP in Tajikistan. In December 2010, the Panel recommended to the Board of Executive Directors (the “Board”) not to investigate the project.<sup>4</sup> While the Panel acknowledged the concerns of the Requesters and understood the issues raised on the Rogun HPP to be serious and deserving attention, the Panel noted that the Bank had agreed to separately finance and manage additional components to address the fears and concerns of downstream riparian countries, including the establishment of two Panels of Experts (POEs), a study of alternatives, and a structured program of riparian consultations. Hence, the Panel considered that one of the requirements for eligibility had not been met.<sup>5</sup> In its conclusion, the Panel stated that its recommendation “does not preclude the possibility of a future claim, relating to compliance and harm, in the event that the Bank decides to finance activities for the construction of the Rogun HPP or a related alternative.”<sup>6</sup>

5. On March 12, 2025, the Panel acknowledged receiving the Request related to the Project by issuing a Notice of Receipt on its website, subsequently informing of its decision the Requesters, their representative and advisor, Management, and the Head of Dispute Resolution Service (DRS). The Panel has conducted its initial due diligence of the Request and determined that it meets the applicable admissibility criteria. Therefore, by way of this Notice of Registration, I hereby inform you that I have registered this Request on April 8, 2025.

### **MPA Program and the Project**

6. The rationale for the MPA Program envisaged to develop the Rogun Hydropower Plant (HPP) is based on the HPP requiring “sustained financing and technical assistance to undertake longer term planning, concerted policy reform and regulatory measures, and infrastructure interventions to achieve the desired development outcomes.”<sup>7</sup> It is estimated

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<sup>4</sup> Panel’s Report and Recommendation on Energy Loss Reduction Project, <https://www.inspectionpanel.org/sites/default/files/ip/PanelCases/70-Eligibility%20Report%20%28English%29.pdf>

<sup>5</sup> The Panel determined that criterion 9(b) of the Panel’s the 1999 Clarifications, which requires that the Request “assert[s] in substance that a serious violation by the Bank of its operational policies and procedures has or is likely to have material adverse effect upon the requesters” had not been met. The 1999 Conclusions of the Board’s Second Review of the Inspection Panel are available [here](#).

<sup>6</sup> Panel’s Report and Recommendation on Energy Loss Reduction Project, p. 11, para. 54.

<sup>7</sup> SFRHP PAD p. 9, para. 26.

that a total amount of US\$ 6.29 billion will be required to complete the Rogun HPP. Funding of US\$2.14 billion will come from the state budget, US\$1.25 billion will come from revenue from the sale of electricity, and US\$2.9 billion equivalent will be provided in the form of grants and concessional loans from ten Development Partners (DPs), including the Bank.<sup>8</sup> Led by the Bank, the DPs have formed the Rogun Coordination Group (RCG). The MPA Program comprises two phases: Phase 1 is estimated at US\$3.387 billion to which the Bank contributes an IDA grant of US\$350 million equivalent. Phase 2 is estimated at US\$2.903 billion and includes an additional IDA grant of US\$300 million equivalent which is expected to be approved around June 2026.<sup>9</sup>

7. In relation to the MPA Program, the Bank's Project (as defined in this Notice of Registration) comprises a Technical Assistance grant and the IDA grant for Phase 1:

8. **Technical Assistance for Financing Framework for Rogun Hydropower Project (P178819)** (the "TA"). The TA was approved on January 12, 2023, with an expected closing date of December 31, 2026.<sup>10</sup> The total cost of the TA is US\$20 million, which is funded with the Bank providing a grant of US\$15 million equivalent and the Asian Infrastructure Investment Bank providing another US\$5 million.<sup>11</sup> The Recipient of the TA grant is the Ministry of Finance of the Republic of Tajikistan, and the Implementing Agency is the Project Management Group for Energy Facilities Construction ("Rogun PMG").<sup>12</sup> At the time of the approval of the TA, the environmental and social risk ratings were both "High". Several Environmental and Social Standards (ESS) were considered relevant.<sup>13</sup>

9. The Project Development Objective of the TA is "[t]o *strengthen Rogun HPP Project's financial and commercial frameworks, enhance its environmental and social sustainability, improve the transparency, and support establishment of Rogun HPP Project's benefit sharing program.*"<sup>14</sup> The TA has four components, as below:

- Component 1: Development of a macroeconomically sustainable financing plan and a commercial framework for Rogun HPP Project,
- Component 2: Improvement of the dam safety,

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<sup>8</sup> The ten Development Partners include the World Bank, European Investment Bank (EIB), Asian Infrastructure Investment Bank (AIIB), Asian Development Bank (ADB), Islamic Development Bank (IsDB), Kuwait Fund, Saudi Fund for Development (SFD), OPEC Fund, Abu Dhabi Fund, and a bilateral financial institution. SFRHP PAD, p. 1, Footnote 1, and pp. 10 and 11, paras. 29 and 30.

<sup>9</sup> SFRHP PAD, pp. 11 and 12, para. 31.

<sup>10</sup> The World Bank, [Project Appraisal Document on a Proposed Grant in the Amount of SDR 11.7 Million \(US\\$15 Million Equivalent\) to the Republic of Tajikistan for a Technical Assistance for Financing Framework for Rogun Hydropower Project](#) ("TA PAD"), December 12, 2022, p. 1.

<sup>11</sup> TA PAD, p. 2.

<sup>12</sup> TA PAD, p. 2.

<sup>13</sup> TA PAD, p. 35, para. 90. ESSs that were considered relevant at the time of TA approval are: ESS 1 - Assessment and Management of Environmental and Social Risks and Impacts, ESS 2 - Labor and Working Conditions, ESS 3 - Resource Efficiency and Pollution Prevention and Management, ESS 4 - Community Health and Safety, ESS 5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, ESS 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources, ESS 8 - Cultural Heritage, and ESS 10 - Stakeholder Engagement and Information Disclosure.

<sup>14</sup> TA PAD, p. 23, para. 47.

- Component 3: Strengthening of Environmental and Social (E&S) framework and benefit sharing aspects of Rogun HPP Project, and
- Component 4: Strengthening of institutional capacity of Rogun PMG and Rogun Joint Stock Company (JSC).<sup>15</sup>

10. **Sustainable Financing for Rogun Hydropower Project (P181029)** (SFRHP). The SFRHP was approved on December 17, 2024, and involves an IDA grant of US\$350 million equivalent. The expected closing date is June 30, 2029. The Recipient is the Republic of Tajikistan, and the Implementing Agency is the Rogun HPP Open Joint Stock Company (OJSC), which includes the Rogun Project Management Group (PMG) responsible for the Power Plant Construction under the President of the Republic, as well as the Directorate of the Flooding Zone (DFZ).<sup>16</sup> At the time of the approval of the SFRHP, the environmental and social risk rating was “High”, and several ESSs were considered relevant.<sup>17</sup>

11. The SFRHP’s Project Development Objective (PDO) is “[t]o increase supply of clean, affordable, and climate resilient hydroelectricity for consumers in Tajikistan and the Central Asia region by 2 TWh.”<sup>18</sup> The SFRHP has four components:

- Component 1: Construction activities,
- Component 2: Project implementation support,
- Component 3: Implementation of Resettlement Action Plan and Livelihood Restoration Plan, and
- Component 4: Hydro meteorological activities.<sup>19</sup>

12. According to the SFRHP PAD, the Bank intends to provide a second IDA grant of US\$300 million equivalent for Phase 2 of the MPA Program, amounting to total grant funding of US\$650 million for Phases 1 and 2 of the MPA Program. According to the SFRHP PAD, the lessons from Phase 1 will inform the design of Phase 2.<sup>20</sup>

## The Request

13. The Request raises several potential ecological harms and interdependent environmental, socioeconomic, health and cultural heritage impacts for communities downstream of Tajikistan’s Vakhsh Hydropower Cascade in the riparian countries. The Request alleges that the Rogun HPP is one of the “*most expensive and time-consuming false solutions*” to end power shortages in winter and reduce greenhouse emissions. The Requesters allege that the export of energy from Rogun HPP will increase the price of electricity for the population of

<sup>15</sup> TA PAD, pp. 24-25, paras. 50-53.

<sup>16</sup> SFRHP PAD, p. ii.

<sup>17</sup> SFRHP PAD, p. v, and p. 12, para. 33. ESSs that were considered relevant at the time of SFRHP approval are: ESS 1 - Assessment and Management of Environmental and Social Risks and Impacts, ESS 2 - Labor and Working Conditions, ESS 3 - Resource Efficiency and Pollution Prevention and Management, ESS 4 - Community Health and Safety, ESS 5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, ESS 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources, ESS 8 - Cultural Heritage, and ESS 10 - Stakeholder Engagement and Information Disclosure.

<sup>18</sup> SFRHP PAD, p. 12, para. 33.

<sup>19</sup> SFRHP PAD, pp. 13-15, paras. 35-39.

<sup>20</sup> SFRHP PAD, p. 12, para. 32.

the countries using energy from this source. The Request alleges that blackouts occur in Central Asia due to the malfunctioning of large generation units and that adding Rogun HPP as a “*single source of maneuvering capacity*” will likely increase the risk for neighboring countries in case of the plant’s malfunctioning. The concerns included in the Request are set out below.

14. **Alleged Inadequacy of Project’s Documentation.** The Request further alleges that the Bank did not comply with its ESF and failed to develop a “*robust*” ESMP and ESCP for the Rogun HPP. The Request alleges that the Bank approved the financing for the construction of the Rogun HPP even though its ESIA is incomplete and based on outdated data. Additionally, they allege the ESIA does not address key environmental and social concerns related to the Project, including in the riparian countries. The Request alleges that the cumulative impacts of the Rogun HPP and other functioning and planned water infrastructure projects downstream of the Amu Darya were not fully considered during the hydropower project life cycle.

15. **Alleged Ecological and Cultural Heritage Harms.** The Request alleges that filling the Rogun HPP reservoir within 13 to 16 years, will cause a reduction of at least 25 percent of the flow of the Amu Darya Delta.<sup>21</sup> According to the Request, this will cause a “*progressive catastrophe*” in an area which they claim is already degraded. The Request alleges that the reduction in the flow of the Amu Darya River could lead to the extinction of critically endangered species of fishes, other riparian species and tracts of floodplain Tugay forests,<sup>22</sup> including the Tigrovaya Balka Nature Reserve, which was recognized as a UNESCO World Heritage site in 2023. The Requesters allege that two fish species of Amu Darya, shovelnose and sturgeons, are both recognized by the International Union for Conservation of Nature as critically endangered, and they could become extinct because of the change in the flow regime of the water and sedimentation caused by the Rogun HPP.<sup>23</sup>

16. **Alleged Socioeconomic Impacts.** The Requesters claim that “*throughout all their lives*” the people and communities living downstream have suffered negative consequences from several dams, canals and other hydrographic structures that have impacted the flow of the Amu Darya River and caused the “*destruction*” of the Aral Sea. The Requesters allege that this existing baseline of the region was omitted in the Rogun HPP ESIA. The Request alleges that around 8 to 10 million people live in the wider downstream area of the Amu Darya River in Uzbekistan and Turkmenistan, including the region where canal systems have been established (Karakum, Karshi, Amu-Bukhara). The Request claims they will be impacted even further by the reduced flow of the river resulting from the Rogun HPP. According to the Request, these communities have been living on the “*brink of extreme physical survival*” for years because of

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<sup>21</sup> The Request refers to the area downstream the Rogun HPP as Amu Darya river, Amu Darya river basin and Amu Darya delta.

<sup>22</sup> “*The Tugay Forests of the Tigrovaya Balka Nature Reserve represent one of the largest remaining tugay ecosystems, a form of riparian forest associated with fluvial and floodplain areas in arid climates*” World Heritage Site, for World Heritage Travelers, Tugay Forests, <https://www.worldheritagesite.org/list/Tugay+forests>. See also Unesco, World Heritage Convention, Tugay Forests of the Tigrovaya Balka Nature Reserve, <https://whc.unesco.org/en/list/1685/>; and Unesco, World Heritage Convention, Amudarya State Nature Reserve, <https://whc.unesco.org/en/tentativelists/5436/>

<sup>23</sup> See Mogue, N. & Karimov, B. 2022. Pseudoscaphirhynchus kaufmanni. The IUCN Red List of Threatened Species 2022: e.T18601A120872031. <https://dx.doi.org/10.2305/IUCN.UK.2022-1.RLTS.T18601A120872031.en>

salinization and desertification of the soil, which they allege impacts agricultural productivity and human health in the region. The Request adds that the Project's impacts combined with the effects of climate change, would severely exacerbate social economic problems caused by increased desertification, salinization of water and lower water flow. The socioeconomic impacts of the Project include in their views: 1) impacts on human health due to the toxic dust storms and low-quality water (with high concentration of salt); 2) decline in living conditions as many communities rely on the watershed for irrigation and would be impacted by the reduced flow and poor quality of the water; 3) increased unemployment and poverty from decline in living conditions and agricultural productivity; 4) migration of communities due to loss of ties to their land and to their communities, as well as damage to their culture; and 5) loss of the recreational properties of the Amu Darya basin.

**17. Alleged Lack of Meaningful Consultation and Disclosure of Information.** The Request alleges that the Project's safeguard documents were not disclosed to impacted persons and communities in Tajikistan and in the riparian countries and that meaningful consultations were not held, including during the preparation of the ESIA in the potentially affected area. This, according to the Request, is a violation of national law and the Aarhus Convention.<sup>24</sup> The Requesters fear a risk of downstream dams collapsing, and they claim that no information was disclosed on emergency action plans for different accident scenarios. The Requesters claim that the ESIA for the Project was not available in Uzbek, Karakalpak and Turkmen languages, which are spoken in the downstream areas of the Rogun dam. Additionally, the Request claims that the Project's documentation does not include a facility for filing compensation claims in case of a dam malfunction or burst.

### **Initial Due Diligence**

18. After it received the Request, the Panel conducted its initial due diligence and verified that the Request meets the admissibility criteria for registration.<sup>25</sup> The Request is not frivolous, absurd, or anonymous, and was signed by two individuals, who live downstream of the Project in riparian countries of Uzbekistan and Turkmenistan and allege ongoing and potential harm from the Project. Based on Panel precedents, where a project's adverse impacts had been alleged to occur in a territory outside the borrower/recipient country, requesters from neighboring countries who claimed to be affected by these impacts, were deemed eligible. The Request includes earlier correspondence exchanged between the Requesters and Bank Management regarding these issues. The Requesters informed the Panel they were not satisfied with the responses provided by Management. The Panel is therefore satisfied that the issues have been brought to the attention of the Bank prior to submission of this Request for Inspection, and that Management has been given an opportunity to respond to the issues raised. The Panel verified that the subject matter of the Request does not concern issues of procurement, and at the time of receipt of the Request, the TA was active, and 37 percent disbursed, and the SFRHP was active and there was not disbursement yet.

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<sup>24</sup> Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (Aarhus Convention), Aarhus, Denmark, June 25, 1998, <https://unece.org/DAM/env/pp/documents/cep43e.pdf>

<sup>25</sup> The Inspection Panel Operating Procedures (December 2022), Sections 2.1 and 2.2; and para. 30.



19. During its review of the Request, the Panel met virtually with the Requesters, and their representative and advisors on March 19 and 28, 2025, to understand the concerns raised in the Request, seek clarifications, and inform the Requesters about the Panel’s process and mandate. The Requesters elaborated on their concerns regarding the impact of the Rogun HPP in the riparian countries of Uzbekistan and Turkmenistan. They emphasized their serious fear of retaliation for raising concerns about the Rogun HPP and submitting the Request to the Panel. The Requesters sent a separate letter to the Panel in which they stated the reason for having an international representative and which they requested not to be disclosed publicly. The letter refers to serious concerns of threats and retaliation in their countries and, therefore, the absence of local representation so as not to imperil the local representatives.

20. As part of its process, the Panel met with Management on March 25, 2025. Management explained that it had been involved in the Rogun HPP development since 2011 discontinuously. Management stated that the Bank’s TA has been key to preparing the SFRHP according to international best practices. Management stated that a Panel of Experts was established in 2022 under the TA and would be retained during project implementation. The Panel of Experts advises on dam safety and planning, design, construction, compliance with standards and updated E&S documents to meet the requirements of the governmental and international financiers. Management explained that the SFRHP is not yet effective and that eight effectiveness conditions remain to be met,<sup>26</sup> including the finalization of the ESIA/ESMP, comprising a transboundary cumulative impact assessment (CIA), the Resettlement Action Plan and guidelines on safety and emergency response. Management explained that a Biodiversity Management Plan and a Cultural Heritage Management Plan are conditions of disbursement. It also stated the draft of the ESIA was publicly disclosed and used for consultations in the riparian countries, including during the SFRHP preparation period (November 2023) in Almaty, Kazakhstan, and that these were attended by 69 participants from five riparian countries.

### **Registration of the Request**

21. As provided in paragraph 18 of the Resolution, “[t]he Chairperson of the Panel shall inform the Executive Directors, the Head of DRS, and the President of the Bank promptly upon receiving a request for inspection.”<sup>27</sup> With this notice I hereby inform you that I have, on April 8, 2025, registered the above-mentioned Request.

22. The Panel’s registration implies no judgment whatsoever concerning the merits of a Request for Inspection. As provided in paragraph 19 of the Resolution,<sup>28</sup> Bank Management shall provide the Panel within 21 business days (by May 7, 2025) a response to the issues raised in the Request for Inspection with evidence that it has complied or intends to comply with

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<sup>26</sup> The eight conditions of effectiveness are: updated ESIA/ESMP, RAP2, Livelihood Restoration Plan (LRP2), security management plan, traffic management plan, Guidelines on Occupational Health and Safety, emergency response and waste management, Grievance Redress Mechanism established and third-party auditor for the RAP/LRP.

<sup>27</sup> The World Bank Accountability Mechanism, [Resolution No. IDA 2025-0001](#) (the “Resolution”), March 7, 2025, para. 18.

<sup>28</sup> The Resolution, para. 19.

Bank's relevant policies and procedures. The subject matter that Management must deal with in the response to the Request is set out in paragraph 20 of the Resolution.

23. After receiving the Management Response, the Panel shall “*determine whether the request meets the eligibility criteria set out in paragraphs 14 to 16 [...] and shall make a recommendation to the Executive Directors as to whether the matter should be investigated.*”<sup>29</sup>

24. This Request has been assigned IPN Request Number 25/02.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ibrahim Pam', with a large loop at the top and a horizontal line at the bottom.

Ibrahim Pam  
Chairperson

Attachments

The Executive Directors and Alternates  
International Development Association

Mr. Ajay Banga, President  
International Development Association

Requesters (Confidential)

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<sup>29</sup> The Resolution, para. 22.