

To: Executive Secretary, The Inspection Panel
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Bank Country Office

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THE INSPECTION PANEL

To: Executive Secretary, The Inspection Panel
P.O. Box 27566
Washington, D.C. 20038

1. We, Ecological Movement of Uzbekistan, represent more than 100 of NGO's of Uzbekistan.

2. We have suffered, or are likely to suffer, harm as a result of the World Bank's failures or omissions in the "CONSTRUCTION OF "ROGUN" HYDROELECTRIC POWER STATION WITH THE 340 METERS HIGH DAM" by the government of the Republic of Tajikistan in one of the main currents of transboundary river of Amudarya which belongs to the basin of the Aral sea.

3. Construction of hydroelectric power station similar to "Rogun" hydroelectric power station will lead to aggravation of the present unfavorable environmental conditions in the region and appearance of numerous social, ecological and humanitarian disasters. Here are some of them:

A. As the hydro-electric power station is being constructed in the zone of Ilyak-Vakhs crust fracture with the category seismic danger reaching magnitude 9 by Richter scale, construction of a massive dam in the seismic active zone can provoke new earthquakes and will create immense danger for life of hundreds thousand people.

In case of dam failure after completion of construction of Rogun hydroelectric power station in the designed parameters, the wave 245 - 280 meters high (depending on the water reservoir filling) in the area of Nurek hydroelectric power station (the start-point) and 6 - 7 meters high in the Republic of Karakalpakstan (the end-point) will destroy the whole cascades of 6 hydroelectric power stations and over 700 settlements in the territory of Tajikistan, Afghanistan, Uzbekistan, Turkmenistan populated with 5 million people, including 3 million living in Uzbekistan. The area of 1.3 - 1.5 million hectares of land will be flooded.

B. There is the thick layer of rock salt in the geological structure of the basis of the dam which is in the zone of active movement of filtration stream. When the level of water in the reservoir rises and the filtration stream starts moving, subsurface erosion in the basis of the dam will develop. The speed of washout under certain conditions can reach the values threatening the integrity of the base and the constructions of the hydro-electric complex.

C. Designing the huge hydroelectric power station was conducted by the same standards as other large hydro-constructions within the CIS which do not include ecological examination and environmental impact assessment.

Construction of the hydro-electric complex in the late 1980s and early 1990s was conducted with considerable deviations from the design. The building suspension in 1992 was done practically without any conservation. The tunnels and other constructions have already been seriously destroyed by powerful mud stream.

By the time of making decision on continuation of the construction many building fragments of the dam have been damaged.

Experts consider that the turbine-generator installation design was made 25 years ago, and today the careful examination is needed to know whether it meets the modern technical norms, requirements, national and international standards.

D. Filling the reservoir with water to the designed capacity (13 billion cubic meters) will take 7-8 years that will lead to a number of negative consequences. Transition to energy generation by Rogun water reservoir after achieving the design parameters, will be followed by deficiency of water in the vegetation period increase by 22,2 % in average, and in the years of water shortage almost twice as high in comparison with the present conditions.

Reduction of the cultivated area and a decrease in land productivity will affect income, living standards and survival ability of over 12 million people of Uzbekistan and 6 million people of Turkmenistan.

E. Construction of Rogun water-reservoir and its operation in energy-generating mode will lead to dramatic deterioration of potable water supply for about 18 million people living in downstream areas of the river.

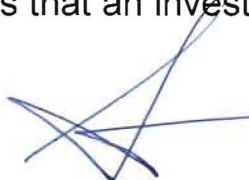
F. Deterioration of the gene pool, conditions for flora and fauna, disappearance of large areas of riparian (tugay) forests, sharp reduction of biodiversity will become the most catastrophic consequences of infringement of the balance of water use in the region due to the construction of Rogun hydroelectric power station.

4. In our opinion, the World Bank is making a one-sided evaluation of the tender procedures for environmental assessment of construction of hydroelectric power station, and do not take into account the interests of all parties, including those countries which are located in the downstream of Amudarya river. Moreover, the draft design of the power station was developed 40 years ago, which completely did not take into account ecological aspects of this project.

5. Representatives of Uzbekistan have complained several times to World Bank staff. The last verbally complains and in writing complains to World Bank were made on July and August 2010. We have received an obscure and not clear verbal response from World Bank. We are not satisfied with a response from World Bank.

6. We request the Inspection Panel recommend to the World Bank's Executive Directors that an investigation of these matters be carried out.

Signatures:



B.Alikhanov, Head of Ecological Movement of Uzbekistan;



S.Sanginov, chairman of "Ecoforum – Civil Society";



D.Fayzieva - Deputy of the Parliament;

And on behalf of more than 100 NGO's.

Date: 7 October, 2010

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