

12.06.2026

**To EIB Board of Directors**

**Briefing to the EIB Board on Rogun Hydropower Project in Tajikistan**

The European Investment Bank is appraising the Rogun Hydropower Project in Tajikistan. The Bank is a member of the Rogun Coordination Group led by the World Bank and it is expected that it will commit USD 550 million to the project.

Rogun Hydropower Project envisions construction of the largest hydropower reservoir in the Aral Sea Basin with profound implications for freshwater ecosystems, regional water security, seismic safety, local livelihoods, and the fundamental rights of communities affected by displacement, resettlement, and the loss of access to land and natural resources.

In October 2024, we shared our concerns with the EIB Management Committee. Specifically, we raised the need for a thorough assessment of how development of the largest reservoir may influence the fragile and already daring environmental situation downstream of the Vakhsh hydropower cascade, thus putting in danger downstream riparian communities in four countries. We called for strict compliance with the mitigation hierarchy to guide the project design to reduce involuntary resettlement that is expected to cover sixty thousand people. We have not omitted to point to the Tajikistan government's track record with human rights and severely restricted civic space in the whole region, resulting in the high risk of harm and violations to basic human rights in the course of the project implementation and a high risk of retaliation against civil society effectively preventing meaningful public engagement. In its reply, the EIB stated it was not in a position to comment on the issues raised in our letter and suggested we engage with the World Bank.

Following the lack of engagement from the European Investment Bank, in December 2025 we lodged a complaint to the EIB Complaints Mechanism under its Prevention procedure. We have also completed and shared with the EIB's Services four key volumes of analysis proving how the EIB standards will be violated if the EIB supports the Rogun project as designed and appraised by the World Bank:

- [Transboundary Impacts of the Rogun HPP](#). Review of the Transboundary Cumulative Impact Assessment for the Rogun HPP (ESIA Vol. 1, Chapter 23) and its compliance with IFC CIA Guidance and World Bank ESF (January 2026)
- [Rogun Hydro vs Biodiversity](#): Review of the Updated Environmental and Social Impact Assessment (ESIA) for the Rogun Hydropower Plant Project for Compliance with the IFIs' Biodiversity Standards (November 2025)
- [Converting Lives into Kilowatts](#). Analytical Note, Comments and Recommendations on the Rogun HPP Resettlement Documentation: RAP-2 and LRP-2 (October 2025)
- [What is more efficient than "the tallest dam in the world"?](#) Analysis of Alternatives for the Completion of Rogun HPP Project (December 2024)

We urged the EIB not to rely on the World Bank due diligence process as its own standards are much more stringent than the World Bank's. Moreover, we would like to highlight that the current

environmental and social impact assessment of Rogun HPP is not in line with the [2019 EIB Environmental, Climate and Social Guidelines on Hydropower Development](#).

Importantly, not only will the project lead to displacement of sixty thousands people, but also all downstream communities in Tajikistan, Turkmenistan and Uzbekistan were excluded from the stakeholder engagement process.

Meaningful stakeholder engagement can only take place in an environment in which any impacted person has the ability to voice their concerns and to do so without fear of retribution. Tajikistan is known to rank extremely low according to all known measures for freedom of expression:

- Article19's [2025 Global Expression Report](#), gave the country 3 points out of 100, ranking 152 out of 161 countries it looked at. The country's freedom of expression situation has been consistently getting worse every year.
- The latest [Civicus Monitor](#) classified Tajikistan civic space as closed, giving it 10 points out of 100 and putting it among the 15 lowest scoring countries on the planet in the area. Here too, year-on-year, Civicus has been observing a deterioration in the civic space situation.
- The Reporters Without Borders [Press Freedom Index](#) ranked Tajikistan 155 out of 180 countries and again observed a deterioration in the situation compared to previous years.
- In the analysis conducted by [Freedom House](#), Tajikistan scores 5 out of 100 in terms of political rights and civil liberties with its score consistently decreasing from year to year.

The risks associated with and controversies around hydropower projects financed by development banks are exceedingly well-documented and resettlement in particular is known to carry significant risks of human rights violations. Indeed in the first phase of the Rogun Dam development, in 2014, Human Rights Watch (HRW) [documented a number of rights violations](#) related to the project. One of the key recommendations of their report was that the World Bank and other potential investors should “*urge the government to allow civil society free access to areas from which residents are being relocated as well as to resettlement sites to enable them to independently monitor and report on the resettlement process and assist people in filing complaints*”. The situation, however, as explained earlier, has only further deteriorated, making the risks for human rights violations even greater and the scale of the project is also much greater, set to affect over 60000 individuals this time around. This amounts to a recipe for a human rights disaster.

Our analysis of the Resettlement Action Plan and Livelihood Restoration Plan (RAP-2 and LRP-2) for the Rogun Hydropower Project identified serious shortcomings that could negatively affect tens of thousands of people.

- The project currently maximizes resettlement numbers, primarily due to an incoherent analysis of alternatives and the use of outdated information and concepts. The resulting resettlement of 60,000 people is the highest figure in the modern history of hydropower development, which cannot be justified by general economic benefits or development plans established decades ago. Given the low levels of transparency, high risk of corruption in, and widespread human rights violations in Tajikistan, it is hardly realistic to undertake resettlement at such scale without causing severe harm to local communities.

- Population data is inaccurate, lacks gender disaggregation, and includes no information on the needs of labor migrants. The plans also only consider those who lose their housing, offering no specific support measures for those who have lost their land but continue to live near the Rogun reservoir.
- The suitability of resettlement sites is highly questionable due to a lack of water supply, arable land, and pastures, which indicates deficiencies in site selection and preparation procedures. As a result, the share of households engaged in irrigated agriculture has dropped from 44% to 6%, forcing people to seek earnings through labor migration.
- The compensation for resettlement is still grossly inadequate and cannot ensure restoration of basic living conditions for all project affected people. In fact, compensations paid to households in RAP-2 are significantly lower than figures reported in the audit of the RAP-1.

This project falls under the Global Gateway. As stated in the [EU's own description](#) of its current approach to Civil Society Roadmaps, "*The latest (4th) generation of Civil Society Roadmaps [...] explicitly integrates the Global Gateway Strategy, making [Civil Society Roadmaps] a central tool for ensuring meaningful civil society participation in and accountability of Global Gateway (GG) investments.*" Such a Roadmap would be key to ensuring that this project is aligned with EIB/EU requirements.

Downstream of the project, the Vakhsh river on which the Rogun Dam is to be built provides 25% of the water of the Amu Darya river, a significant water flow that livelihoods depend on in Afghanistan, Turkmenistan and Uzbekistan. Earlier we shared with EIB the analysis of the substandard Transboundary Cumulative Impact Assessment (TCIA) inserted into the ESIA, that demonstrates deficiencies in its scope and improperly conducted analysis of scenarios for the future. All in all, it fails to recommend effective mitigation measures. A project of this scale poses a number of risks, including in terms of water shortage during the filling of the dam or risks associated with dam rupture. All three countries rank among lowest in the world using the four civic space ranking methodologies listed above (ie. Global Expression Report, Press Freedom Index, Civicus Monitor and Freedom House rankings). Indeed, alongside Tajikistan, Turkmenistan and Afghanistan also rank among the most restrictive countries on the planet in terms of civic freedoms. It is difficult to imagine that any stakeholder engagement for downstream project affected persons in any of these countries would be able to live up to EIB requirements.

Additionally, we identified the following undoubtful non-compliances with the EIB Standard 4 - Biodiversity and Ecosystems:

1. The EIB's standard as a minimum requires to achieve no biodiversity loss, and **a Net Positive Impact**. The World Bank standard aims to achieve No Net Loss (NNL) of biodiversity. For the Rogun Hydropower Project this means that:
  - *All species and habitats protected by national, EU and international law should be assessed one by one;*
  - *Alternatives for the construction of the project should be assessed by taking into account the impacts on all these species and habitats;*

- *The chosen alternative in the current ESIA published by the WB is unacceptable because it will have significant impact on protected species and habitats.*
2. The Rogun Hydropower Project has not passed any **Do No Significant Harm (DNSH) assessment** yet, as required by the EIB's standard and cannot be supported by the EIB without such.
  3. EIB's standard requires that all projects comply with the standard and international good practices set out in the following international conventions: The Convention on Biological Diversity including the Nagoya Protocol; the Convention on Wetlands of International Importance; the Berne Convention on the Conservation of European Wildlife and Natural Habitats; the Convention on International Trade in Endangered Species of Wild Flora and Fauna, the Convention on the Conservation of Migratory Species of Wild Animals. In the current version of the ESIA **there is no assessment on the compliance of the project with EU legislation, nor with these conventions.** For example, several birds from Appendix I of the Convention on the Conservation of Migratory Species of Wild Animals and several Ramsar sites in the Amu Darya river basin could be impacted, but there is no assessment. Even more, potential impacts on the Tigrovaya Balka UNESCO Heritage Site are completely ignored in the ESIA. There is also no assessment on the compliance with the Habitats, Birds and Water Framework Directives.
  4. The ESIA does not follow any good international practices in terms of adequate characterisation of the baseline conditions and threats and application of the mitigation hierarchy as defined in the EIB's Standard 1.
  5. The Critical Habitat (CH) definition at EIB is more stringent than at the WB. For example, vulnerable species and species of European importance do not trigger CH according to the WB policy.
  6. Undoubtedly, the project will have irreversible impacts on high-value biodiversity (fish species, Egyptian vulture, juniper and riparian forests, endemic plants, etc.) but no valid assessment of alternatives has been carried out in violation of article 15 of Standard 4 - Biodiversity and Ecosystems. The final choice of the reservoir with the highest proposed dam height will certainly lead to significant net reduction in the populations of several protected species, at least on national level.
  7. For projects expected to have impacts on the the viability of a critical habitat and/or a habitat of high biodiversity value regardless of any proposed compensation or offset, the **EIB's standard requires the promoter to redesign** the project to avoid the need for such compensation/offset. If the baseline studies and assessments are done adequately, it would become evident that the Rogun project should be redesigned at least to a lower-height dam and smaller size reservoir.
  8. The project is not consistent with protection requirements for Tigrovaya Balka and other Ramsar and UNESCO sites downstream from the Rogun dam. For example, the World Heritage Committee issued special requirements, that in case of a large dam is planned on a river upstream of World Heritage properties, then a special impact assessment of the proposed project on the Outstanding Universal Value of the World Heritage property should be carried out in accordance with relevant Guidance for Impact Assessment in the World Heritage Context. This has not been done.

**We call on the EIB Board of Directors to verify prior approval of Rogun Hydropower Project compliance with the EIB's Environmental and Social Standards as well as relevant EU standards, including the production of a Civil Society Roadmap ensuring meaningful stakeholder engagement, and refuse its financing if such compliance is not proved by the relevant assessments, project design and stakeholders engagement. We call on the EIB Board of Directors to ensure that the EIB engages with all interested stakeholders over its project due diligence process. We request to be taken into account as interested stakeholders in public consultations and any other interactions on these matters.**

Yours sincerely,

CEE Bankwatch Network, Czechia

Defenders in Development campaign, International

Rivers without Boundaries, International

International Rivers, International

Nash Vek PF, Kyrgyzstan

Rivers & Rights, Thailand

Urgewald, Germany

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