



**DOCUMENT OF THE EUROPEAN BANK
FOR RECONSTRUCTION AND DEVELOPMENT**

STRATEGY FOR TAJIKISTAN

**REPORT ON THE INVITATION
TO THE PUBLIC TO COMMENT**

OFFICIAL USE

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1. INTRODUCTION

The objective of this report is to summarise the key comments received from stakeholders during the consultation period on the Bank's Strategy for Tajikistan and provide the Bank's management response.

In accordance with the EBRD Access to Information Policy (AIP), the draft strategy for Tajikistan was posted on the EBRD website in for 45 calendar days, starting from 15 July 2025. The public was invited to comment on the draft strategy no later than 29 August 2025. The Tajik and Russian language versions of the draft strategy were also made available and have been published in July 2025. The previous strategy was made available alongside on the EBRD website at <https://www.ebrd.com/home/what-we-do/where-we-invest/tajikistan.html>

Information about the public consultation process was posted on the EBRD's dedicated "Have your say" webpage, which highlights the latest opportunities for the public to comment on the Bank's policies and strategies under review. Targeted notifications of the consultation process were sent to local and international Civil Society Organisations (CSOs) that have expressed interest in the Bank's work in the country.

During the consultation period, one letter with set of written comments was received by the EBRD on 29th of August 2025.

In line with the Bank's increased efforts to involve civil society at an early stage of country strategy development (country diagnostics), the EBRD organised a consultative meeting with civil society organisations (in hybrid format) on 11 October 2025.

The objective of the meeting was to gather civil society's feedback during the preparatory phase for developing the draft strategy. Seven (7) different civil society organisations participated in the consultation.

The EBRD was represented by the Head of Resident Office, Senior Political Councillor, the Country Economics, Strategy and Policy and the Civil Society Engagement teams.

The summary of the key messages and the list of CSO participants in the consultation process are provided in the Annex 1 to this report.

COMMENT	EBRD RESPONSE
<p>We were pleased to see that the EBRD followed its well-established good practice and commitments under the Approach to Civil Society Engagement and organized in 2024 early-stage consultations prior to drafting the new country strategy for Tajikistan.</p> <p>We appreciate that the Strategy's Key Messages from Civil Society therefore reflect the local civil society organisations' comments and recommendations. We also welcome the EBRD's commitment to gender equality and the special emphasis on underserved groups, including women and youth, and a focus on less developed regions.</p> <p>A solid comprehensive outline of the political situation and existing challenges in the country is also provided in the Annex 1 Political Assessment in the Context of Article 1, which is greatly appreciated.</p> <p>Among other issues, the Political Assessment draws attention to the intensity of pressure on already depleting number of civil society organisations that are heavily burdened by registration and reporting bureaucracy, censorship, lack of capacity and funding. The challenges of Tajik civil society, although well reflected in the Political Assessment, unfortunately, are not addressed in the EBRD's priorities, key objectives and activities for the coming five years.</p> <p>Amidst weak judiciary independence and ineffective anticorruption mechanisms, further erosion of civic space in the country would undermine the bank's efforts on improving good governance and government effectiveness, plus it raises significant risks to 'inclusive investment and more effective political transition' of Tajikistan.</p>	<p>The comments are acknowledged.</p>

<p>CSO has recommended the following amendments to the draft strategy:</p> <p>Section 4 Defining Tajikistan Country Strategy Priorities</p> <p><i>Complement What needs to change?</i> with the following: <i>The operating environment for CSOs is worsening.</i></p> <p><i>Complement What can the Bank do?</i> With the following: Increased focus on governance improvements, including working with the SOEs and public stakeholders and <i>improvements in the environment for public participation.</i></p> <p>Section 5 Activities and Results Framework</p> <p><i>Complement Activities under Improved governance and business environment</i> with the following: <i>Build capacity and promote an enabling environment for public participation in development, in which project affected persons enjoy the support of independent civil society actors.</i></p> <p><i>Complement Tracking Indicators</i> with the following: <i>Number and quality of public consultations and engagements with civil society.</i></p> <p>Section 6 Mapping International Partners' Complementarity in EBRD Business Areas</p> <p><i>Under Cross-cutting Themes</i>, include <i>Voice, accountability and rule of law as an additional theme.</i></p> <p><i>Under Well-governed</i>, include <i>Support CSO capacity-building, participation in multi-stakeholder policy committees and decision-making on investments and public infrastructure planning.</i></p> <p>Section 7 Implementation Risks and Environmental and Social Implications</p> <p>Complement the Risks to Strategy Implementation with the following: <i>Limited civic space undermining investment impact and compliance.</i></p>	<p>Comments are well noted for the Sections 4,5,6 and 7.</p> <p>We acknowledge the concerns raised regarding the operating environment for CSOs, including administrative burdens, capacity constraints and funding pressures.</p> <p>Civil society is an important stakeholder for the EBRD. It plays a critical role in delivering impact-oriented, targeted projects and policy work, contributing valuable research and advocacy to foster long-term, broad-based support for sustainable and inclusive economic development.</p> <p>The EBRD supports civil society through its Civil Society Capacity Enhancement Framework and recently adopted Approach to Civil Society Engagement (2024-29) that outlines principles and levels of engagement with civil society. One of the four strategic objectives of this approach is to support and engage with civil society through meaningful mechanisms throughout our operations.</p> <p>Our ongoing dialogue and engagement with civil society focuses on human rights and democracy, environmental and social issues, economic inclusion and gender, transparency, good governance, business development issues, and digital transition, related to EBRD's work and our countries of operations.</p> <p>The Political Assessment in the context of Article 1 reflects these trends. Within our private-sector-focused mandate, we will continue to engage systematically with civil society across our operations, in line with the Approach to Civil Society Engagement, the Access to Information Policy, and the Environmental and Social Policy notably Performance Requirement (PR) 10: Information Disclosure and Stakeholder Engagement.</p> <p>In the context of the country strategy revision, the Bank engaged with civil society through a hybrid consultation meeting and notifications of the consultation process.</p> <p>The key messages of CSOs are reflected in the strategy's dedicated page as well as the present report.</p>
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<p>The Rogun HPP weighs heavily on the country's sustainable transition and will undoubtedly impact the EBRD's ability to deliver on its commitments outlined in the draft strategy to further support the country's public sector reforms, development of human capital, as well as rehabilitation of the grid, supporting better connectivity, public services and renewables.</p> <p>In view of the above, we welcome the EBRD's attention to the high vulnerability of Tajikistan to climate risks and the fact that the 'country's reliance on hydropower further exacerbates its vulnerability to climate change' and the bank's commitment to 'Increased renewable energy, resource and energy efficiency, and climate resilience' (Section 4 on Strategy Priorities).</p> <p>In this regard, we encourage the EBRD to stay out of Rogun and to cooperate with other MDBs, the Tajk government, SOEs, the private sector and public stakeholders, ensure fiscal discipline, accountability and the rule of law, and the allocation of sufficient resources for social development, sustainable public infrastructure and inclusive business.</p>	<p>The EBRD remains committed to supporting sustainable infrastructure development that balances economic growth with environmental protection. Transparency, science-based decision-making, and meaningful engagement with civil society organisations are integral to our approach. We are also committed to working with regional governments to ensure that environmental considerations are embedded in energy and infrastructure development.</p> <p>With regards to hydropower, our engagement in Central Asia remains limited as we are not currently supporting auctions for hydropower projects. Our primary focus has been on the rehabilitation of existing hydropower facilities to enhance safety, efficiency, and climate resilience.</p> <p>We are not involved in financing the Rogun Hydropower Plant and while exploratory discussions on potential projects may arise in future, any engagement will be subject to rigorous environmental and social due diligence.</p>
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ANNEX 1

Consultation with Civil Society Organisations on the EBRD country strategy for Tajikistan

11 October 2025

Key Messages from CSOs to the EBRD

- Local civil society is interested in regular engagement with the EBRD, including involvement in multi-stakeholder platforms between government, donors, businesses and other actors to hold open discussions, provide feedback, and ensure government policies and decisions consider civil society's input.
- CSOs call for greater support for people with disabilities, particularly women, to tackle isolation and violence.
- The civic sector believes that its organisational capacity and financial sustainability needs to be strengthened as well as legal and political environment in which it operates needs to be protected.
- Implementation of regulations on financial disclosure, conflict of interest, procurement, and anticorruption initiatives should be closely monitored.
- More attention needs to be paid to the air quality, water issues, and sustainability of municipal and energy infrastructure, including waste management.
- Sustainability of CSOs remains challenging due to limited financing, compounded by stricter registration and financial reporting requirements as well as increased inspections under recent national legislation.
- Tajikistan has made progress in gender equality, but significant challenges persist. CSOs highlight the need to address unequal opportunities for boys and girls, worsened by early marriages and limited access for people with disabilities.
- Policy reforms are needed to enhance e-governance, transparency, and efforts to fight corruption.

List of CSOs participating in the consultation meeting

1. Human Rights Centre of Tajikistan
2. Bureau on Human Rights and Rule of Law
3. Global Water Partnership of Tajikistan (GWP)
4. National Union of People with Disabilities of Tajikistan
5. NGO Saodat
6. Jahoni Mo Young Generation of Tajikistan