CSO comments on the project given as intervention during the 16^{th} GCF Board Meeting, April 2017

This is the only funding proposal at B. 16 that civil society groups are recommending for rejection.

- Rehabilitating old dams is generally preferable to building new ones, and the Tajikistan rehabilitation project may make good development sense. But GCF funds are intended to foster transformational change towards a climate resilient future. This project deepens the country's already alarming over-dependence on business-as-usual hydro, which is particularly vulnerable to the impacts of climate change.
- This project doesn't solve Tajikistan's most pressing energy need, which is addressing the lock-in of hydro: The EBRD recognizes that a study of renewable energy potential in Tajikistan would be very valuable, but dismisses it because results would take too long. This evidences how the country is dangerously locked into hydro. Today, renewable energy technologies such as solar, wind, micro-hydro, etc, are available and getting cheaper. The GCF could play an important role in alleviating the country's lock-in hydro.
- The EBRD points out that by ensuring that the dam continues operations there will be no need to replace it with new green-field dam infrastructure elsewhere. But energy demand only escalates with time, and new energy projects will have to be implemented eventually. The obstacles Tajikistan faces in pursuing alternative energy are not addressed in this project; thus leaving the country to continue on the same path, which may eventually demand the construction of new large dams.
- Doubts on the long-term benefit of the project: The proposal mentions that hydropower provides approximately 98% of Tajikistan's electricity, while acknowledging that hydro is inherently sensitive to climate change impacts. Best international practices may buy the dam valuable time, but they will not fix the underlying problems that climate change brings to hydro plants in Tajikistan, such as the shrinking of the ice and snow that feeds the dam. Why would the GCF fund a project with technology that is not viable in the long term?
- <u>Lack of consultation:</u> The project does not mention any consultation process carried out with local people living in the area, to get their perspective on if/how the project will benefit them.
- <u>Gender:</u> There is no gender assessment of the project, but rather an information sheet with a summary of Tajikistan's gender profile, which describes the survey and assessment that will be made to identify the key gender issues. Whilst this information is useful, it does not ensure that a gender perspective was taken into account from the beginning. For example, it does not

provide information on the impacts of this project on the existing gender situation or how this project will bring benefits or create co-benefits for women.

- <u>Beneficiaries:</u> The ITAP's assessment implies that there is no certainty as to who will benefit from the project, by saying "the funding proposal claims that more than 1.2 million poor people will benefit from increased clean electric, but there is risk that industry will have higher chances on that energy". It then says that only post implementation monitoring could report results of efficiency. This opens up the question of who will actually benefit from the energy.
- <u>Neither innovative nor crosscutting:</u> The project's documentation acknowledges that "the country is highly vulnerable to the impacts of climate change and that more frequent and severe extreme events are predicted to affect the already ailing hydropower sector in the future". An innovative and crosscutting project would have enabled an environment for climate-resilient energy sources to thrive, or possibly address the winter shortfalls of hydro with adequate technology that is not inherently sensitive to climate change.
- Large dams are business as usual, old fashioned technologies, promoted in times where no
 other solutions were available. Due to their lack of flexibility towards climate variation, they are
 ill-suited to solve the long-term vulnerability conditions inherent to hydropower in Tajikistan.
 Supporting large dams would set the wrong precedent for the type of projects the GCF is
 prepared to support now and in the short future. The Board should reject this proposal.