

February 10, 2015

**The Executive Secretary  
Inspection Panel**

World Bank  
1818 H Street NW, MSN 10-1007  
Washington, DC 20433  
USA

We, the undersigned community representatives and local organizations from Mongolia and Russia, are writing to register our complaint against the World Bank's current funding for a \$25 million technical assistance project in Mongolia known as the Mining Infrastructure Investment Support (MINIS) project.<sup>1</sup> We have significant concerns regarding the potential harms of the project that the Bank's Task Team (TT) and the Project Implementation Unit (MINIS PIU) continue to ignore and underestimate. We have also detected major policy infractions while the World Bank is moving forward with the project.

The MINIS sub-projects, including but not limited to, the Component 1's Support for Infrastructure Investments, specifically on the Shuren Hydropower Plant and the Rural and Flow Regulation of the Orkhon river and construction of water reservoir complex<sup>2</sup> continue to suffer from lack of scientific assessment of risks and mitigation measures before proceeding; absence of assessment of sub-project alternatives; improper selection of sites and questionable hiring of consultants; and inadequate consultations with communities and civil society groups. The Task Team and MINIS PIU continue to handle the sub-project selections very poorly. For instance, they are advancing the studies for the development of two large dams without due evaluation of alternatives and without full compliance to WB safeguard policies.

While the Bank is only financing the prefeasibility and feasibility studies for the aforementioned subprojects at the moment, we are deeply concerned that the Bank's involvement in these preparatory studies will serve as the launching pad for investments in the actual physical infrastructure in the future.

By moving forward with these studies without critical assessment of the cumulative and trans-boundary impacts, the WB is essentially backing up the government to advance its controversial plan to develop large-scale hydropower investments. Ill-conceived hydropower projects are economically undesirable and pose multiple social and ecological risks in the water-scarce Mongolia. By now 2 to 3 more hydropower projects are being pushed in the Selenge River Basin.

Maximum disclosure of project documents and broad, meaningful and systematic consultations with the impacted communities, civil society, academics, and other key stakeholders are critical in developing such studies. However, the World Bank's practices have been very alarming. Despite our multiple engagements with World Bank staff in Washington, DC and Mongolia for over two years (some of which is documented in Annex 3, attached), we do not find that their responses have resulted in

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<sup>1</sup> See: <http://www.worldbank.org/projects/P118109/mn-mining-infrastructure-investment-supp?lang=en>; See also: <http://www.minis.mn/>.

<sup>2</sup> It is also referred to as the Orkhon-Gobi Water Diversion project.

acceptable resolutions to our procedural and substantive issues with the project including the lack of disclosure of project documents, poor quality of design and practices of stakeholder consultations, weak assessment of risks, questionable criteria for sub-project selection, and lack of assessment of viable alternatives.

The Bank's failures to address these fundamental concerns represent a violation of its applicable safeguard, access to information, and project supervision policies. The World Bank should have actively enforced these policies. However, for over two years of engagement and after reviewing the disclosed project documents, we believe the World Bank has not been fully complying with their safeguards contrary to their official line.

Under the Environmental Assessment (OP/BP 4.01 [1999]), for example, it has neither developed risk mitigation plan for sub-project studies that will have significant environmental impacts nor developed an analysis of alternative designs and sites, or consideration of "no option". Even the Environmental and Social Safeguards Management Framework (ESSMF) of MINIS project does not provide the commensurate due diligence, participation, and information disclosure plan and how our views are taken into account. In Annex 1, we provided an elaboration of the policy breaches that we find the Bank has committed.

These concerns warrant a robust application of Bank policies because there is insufficient evidence that the risks of implementing large-scale dams like the ones being considered for the Shuren HPP and the Orkhon-Gobi diversion outweigh the purported benefits.<sup>3</sup> Furthermore, the UNESCO World Heritage Committee states in its decision at the 38th Committee Session in 2014 that it "[f]urther requests the State Party of Mongolia to invite an IUCN [International Union for the Conservation of Nature] reactive monitoring mission, with an invitation also extended to the authorities of the Russian Federation, in order to review the scope, scale and status of the dam projects in Mongolia and to have a discussion early in the planning process about the potential impacts of these projects on the property[Lake Baikal Heritage Site]".

By failing to fully comply with the Bank's applicable policies and by not acting on our procedural and substantive concerns with the sub-projects, we are deeply worried that these will result in irreversible environmental impacts on the Selenge River Basin and Lake Baikal and significant socio-economic impacts on the communities who depend upon these resources, as summarized below. In Annex 2, we provided a matrix detailing the potential harmful impacts.

#### *Environmental Impacts*

- Disruption to the river flow and human/animal movements. For instance, the dams will likely block the migration paths of endangered fish species, causing a decrease in available fish stock;

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<sup>3</sup> See: "Large hydro-electric dams unviable and seriously damaging to emerging economies", University of Oxford, 10 March 2014 (<http://www.sbs.ox.ac.uk/school/news/press-office/press-releases/large-hydro-electric-dams-unviable-and-seriously-damaging-emerging-economies>).

- Damage to Selenge ecosystems and native species<sup>4</sup>, for instance through the introduction of exotic species; which could lead to further direct destruction of already-endangered fish species;
- Low quality of water supply;
- Degradation of critical habitats, including floodplains and the Selenge River Delta Ramsar site;
- Possible accumulation of heavy metals, potentially endangering human health;
- Increased greenhouse gas (methane) emissions, contributing further to the severe effects of climate change in Mongolia;
- Loss of geologic stability and increased risk of damage from landslides due to erosion, earthquakes, and flooding from catastrophic dam failure;
- Unpredictable water flows caused by climate change and desiccation of Mongolian landscape will be exacerbated by dam projects. Flow volumes are decreasing in rivers such as the Orkhon, and data suggests that under current conditions the Orkhon River will not survive the planned diversion to the South Gobi region; and
- Degradation of Lake Baikal, a designated UNESCO World Heritage Site, due to alteration of Selenge River ecosystem patterns and processes.

#### *Socio-economic Impacts*

- Loss of access to traditional water and pasture resources by nomadic communities in Bulgan, Huvsgul, Selenge, Orkhon, Uvurhangai, Dundgobi, in the South Gobi provinces of Mongolia;
- Disruptions to ecosystem services such as Selenge River fish population will increase competition for people who depend upon the fish stock for their livelihoods;
- Loss of economically valuable land, especially important crop and pasture land, as a result of reservoir flooding and floodplain degradation;
- Potential resettlement of about 30-100 families at each planned reservoir site and more from planned pipeline path;
- Loss of ecotourism opportunities and loss of access to traditional resources by local businesses dependent on river and lake resources which also pose high risks of their insolvency for existing ecotourism enterprises;
- Loss of culturally significant archaeological sites in the Selenge River Basin. The Orkhon and Selenge rivers itself are also considered sacred by traditional Mongolian and Buryat shamans; Lake Baikal is a major sacred object for all peoples populating the region.
- Loss of crops due to the conversion of lands;
- Loss of ecological service of critical habitat;
- Loss of honey bearing plants - damage to bee farms; and
- Loss of vast areas of floodplain forests to Shuren Hydropower Project.

Given the magnitude of potential harms that will be suffered communities across the Mongolian and Russian boundaries over long terms and the policy violations that the World Bank continues to commit, we therefore request the Inspection Panel to

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<sup>4</sup> If Shuren HPP is built as planned it will eliminate 40 families of 241 types of honey-bearing plants counted by the 2014 Survey of Honey-bearing Plants.

conduct an investigation of this MINIS project.

In addition, we request that our names are not disclosed considering the security risks to the complainants. It is requested that Ms. SUKHGEREL Dugersuren of Rivers without Boundaries (RwB)-Mongolia and Mr. Alexander KOLOTOV of RwB-Russia be accepted as first line of contact for complainants due to language barriers constraining direct communication.

Signed,

FOR SIGNATURES PLEASE SEE RUSSIAN AND MONGOLIAN TEXTS OF THIS COMPLAINT.

**List of attachments**

**Annex 1:** Matrix of applicable World Bank policy violations we have detected

**Annex 2:** Matrix of potential impacts

**Annex 3:** Documentation of engagement with World Bank staff

**Annex 4:** Elaboration of problems with Stakeholder Engagement and project oversight

## ANNEX 1: MATRIX WORLD BANK POLICY VIOLATIONS THAT WE HAVE DETECTED

Violation	Description	Applicable World Bank Policy/ies
Threatening globally significant natural habitat - Lake Baikal & Selenge River Delta.	<ul style="list-style-type: none"> <li>• Lake Baikal/Selenge Delta Ecosystem is recognized as top global conservation priority. It is well known that large dams usually have significant impact on downstream ecosystems (WB has special OP addressing it).</li> <li>• Therefore the MINIS Project simply SHOULD NOT identify dams in Selenge Basin as opportunities to be studied.</li> </ul>	OP 4.04 – Natural Habitats
Threatening significant critical habitat- Selenge and Orkhon Rivers	<ul style="list-style-type: none"> <li>• Selenge and Orkhon Rivers are the last habitat in Mongolia for Siberian Baikal Sturgeon – listed as endangered and critically endangered in Mongolia. Sturgeon and some other fish migrate from Baikal Lake and back.</li> <li>• Eg, Selenge and Orkhon Rivers are also important habitat for other IUCN-listed species such as Siberian Taimen.</li> <li>• In harsh winters large river channels are the only refuges available for river fish and thus by definition critical habitat for the whole freshwater biota.</li> <li>• Selenge River is the only large river in Mongolia and therefore unique and irreplaceable habitat from national perspective. It has highest freshwater habitat and aquatic species diversity compared with smaller rivers.</li> </ul>	OP 4.04 – Natural Habitats
Violating the scope of MINIS Project	<ul style="list-style-type: none"> <li>• Shuren Hydro is not directly related to mining sector. Its original function was to cover peak demands and add reliability to Central Energy System. However, the MINIS project mandate was to develop infrastructure supporting mining sector and Shuren hydropower is clearly not related to it.<sup>1</sup></li> <li>• The WB commissioned a study in 2009 on development of energy sources for South Gobi mining and this study did not consider hydropower as an option that is directly relevant to mining industry. Some other SUB-projects under MINIS also likely violate mandate, such as the Baganuur mine expansion.</li> </ul>	OP 4.01 – Environmental Assessment
Encouraging inefficient development of energy sector	<ul style="list-style-type: none"> <li>• Mongolia has scarce rivers with extreme temporal variability of flows. The energy potential of rivers is minuscule in comparison with the extremely abundant resources of solar, wind, coal. By supporting two hydropower dams the MINIS project encourages development of a sector which has a very questionable future and the highest possible risks of failure in Mongolia.</li> <li>• When in 2012 Rivers without Boundaries (RwB) suggested to the WB Task Team Leader at the time (Gerald Ollivier) to conduct an analysis of alternatives or strategic assessment for energy development he said that MINIS cannot do it.</li> </ul>	OP 4.01 – Environmental Assessment
No scientific assessment of alternatives	<ul style="list-style-type: none"> <li>• No meaningful and impartial assessment of alternatives was made for electricity supply to</li> </ul>	OP 4.01 – Environmental Assessment

<sup>1</sup> See: MINIS ESMF, November 2013, Section 3.1. ([http://www-wds.worldbank.org/external/default/WDSCcontentServer/WDSP/IB/2013/11/18/000333037\\_20131118145006/Rendered/PDF/E25900V30REV0P0Box379864B00PUBLIC0.pdf](http://www-wds.worldbank.org/external/default/WDSCcontentServer/WDSP/IB/2013/11/18/000333037_20131118145006/Rendered/PDF/E25900V30REV0P0Box379864B00PUBLIC0.pdf))

	<p>central system (alternatives to Shuren) at the pre-feasibility phase. The TOR intentionally limited the number of alternatives to be assessed, leaving the most competitive out of consideration.</p> <ul style="list-style-type: none"> <li>• A similar change in the TOR for Orkhon excluded some imported water supply options from the evaluation.</li> </ul>	BP 4.01 – Annex A: Application of EA to Dam and Reservoir Projects
No appropriate public disclosure and consultations in Mongolia or Russia in last 2.5 years.	<ul style="list-style-type: none"> <li>• No consultations with stakeholders in Russia whatsoever, except for ministry officials.</li> <li>• Results of pre-feasibility study not shared with public despite this item being a part of consultants' TOR published online</li> <li>• MINIS-project web-site does not retain all previously published information (TORs, etc) and no basic information on sub-projects. WB website MINIS- page incomplete (e.g. lacks midterm appraisal report and inconsistent with MINIS Project website.</li> <li>• Some information was never available in Mongolian.</li> <li>• Plan for stakeholder consultation and information disclosure not available for any sub-project.</li> </ul>	<p>Access to Information Policy</p> <p>Suite of Safeguard Policies, including but not limited to Environmental Assessment, Natural Habitats, Physical Cultural Resources, Indigenous Peoples, and Involuntary Resettlement.</p>
Suggested consultation template is vague and inefficient	<ul style="list-style-type: none"> <li>• In fall 2014 the WB sent to Rwb an "Indicative Consultation and Disclosure Process for Shuren Hydropower Plant Project". The problem is that it is hardly comprehensible and the note does not adequately reflect stakeholder comments.</li> </ul>	<p>Access to Information Policy</p> <p>Suite of Safeguard Policies, including but not limited to Environmental Assessment, Natural Habitats, Physical Cultural Resources, Indigenous Peoples, and Involuntary Resettlement</p>
Grievance redress mechanism not available	<ul style="list-style-type: none"> <li>• According to the Environmental Social Screening Framework, the Project Management Unit was supposed to develop an appropriate grievance redress mechanism to be incorporated in the Operational Manual and which will be regularly monitored and evaluated by the PMU during the implementation of projects.</li> <li>• We requested this several times and never received it.</li> </ul>	<p>OP 10.00 – Investment Project Financing</p> <p>Suite of Safeguard Policies, primarily Indigenous Peoples and Involuntary Resettlement</p>
Handling of World Heritage requests inappropriate	<ul style="list-style-type: none"> <li>• The World Heritage Commission has addressed the Government of Mongolia (GOM) twice in 2013 and 2014. Mongolia was late to respond and its response in 2013 did not meet WHC requirements.</li> <li>• Presently, the GOM is trying to hire Russian consultants and make others believe that this is a form of public participation from the Russian side.</li> <li>• So far, no open consultations or hearings are envisioned in Russia.</li> <li>• Development of ESIA TOR for Shuren and Orkhon is undertaken before reactive mission commissioned by world Heritage Committee visits Mongolia and develops recommendations.</li> </ul>	OP 7.50 – Projects on International Waterways
Cumulative impact assessment for dams never started	<ul style="list-style-type: none"> <li>• Although due to Rwb pressure the Cumulative Impact Assessment (CIA) was prescribed as a priority for Selenge basin, there is no sign it ever started in pre-feasibility phase. Meanwhile, 4 dam projects and many mining activities are being actively developed in the Selenge basin.</li> </ul>	OP 4.01 – Environmental Assessment

	<ul style="list-style-type: none"> <li>• Consultations on the TOR for the CIA for Baganuur and Tavan Tolgoi mines started on November 21, 2014, but they were very poorly organized (participants were contacted the day before) and had no clear process. It is unknown whether and how stakeholder comments were taken into consideration in further development of those TOR.</li> </ul>	
Threatening public water supply	<ul style="list-style-type: none"> <li>• The Shuren Hydro design on which all hydrological and economic calculations were based was known to threaten the huge water intake facility of Erdenet city.</li> <li>• Shuren Project personnel knew that, but until summer 2014 they did not disclose the fact that most pre-feasibility study calculations are based on a design that cannot be realized due to this conflict.</li> </ul>	OP 4.07 – Water Resource Management
MINIS supports economically questionable policy	<ul style="list-style-type: none"> <li>• Mongolia derives most of its water supply from alluvial subsurface sources in river valleys. However, Mongolian politicians have rallied to switch from groundwater to surface water. Water prices have been distorted to assist dam building.</li> </ul>	OP 4.07 – Water Resource Management
Sequencing of MINIS “studies” is not done in proper compliance with Bank’s environmental assessment policy	<ul style="list-style-type: none"> <li>• The Orkhon-Gobi water conveyance system has been actively promoted by MINIS since summer 2012. However, the comprehensive “Groundwater Component” which was supposed to evaluate groundwater resources in the Gobi and, therefore, to determine whether any water conveyance system is needed at all barely started only 2014 after 2-3 years of delay.</li> <li>• Studies like “1.1.7b Feasibility Study of South Gobi development – hydrogeological exploration in the region to address mine water supply sources” started in the second half 2014.</li> <li>• The normal logical sequence would be the opposite. This work sequencing fully contradicts the WB’s initial studies of 2008-2010, which have shown that groundwater potential should be explored first and only then we can determine necessity for water transmission.</li> <li>• Although the groundwater assessment has barely started, the MINIS Director appears at various conferences and/or published papers where he talks about the necessity to “complement” groundwater supply by long-distance transmission of surface water.</li> </ul>	OP/BP 4.01 – Environmental Assessment
Integrity and quality of the “project evaluation” are compromised	<p>The main discussion Rwb and Greenpeace had with the WB TTL over the years was about the clarity of the process of evaluating /selecting projects for the next pre-feasibility and feasibility phases. Since 2012 the WB has always mentioned but failed to demonstrate the “Project Viability Assessment” and documented use of these procedures for project ideas initiated and then terminated under MINIS.” In reality, project selection and promotion under MINIS was a highly political process catering to the changing interests of 4-5 participating ministries. There was no good mechanism for initial identification and no impartial assessment at later stages. All 6 projects initially listed in the appendix to the Project Appraisal Document were dropped due to changes in the government.</p> <p>This is especially obvious in the case of Shuren Hydro – we have 3-5 letters from all WB levels promising “viability assessment” and now we learned that the pre-feasibility study was done with gross violations of the TOR that was earlier cleared by the WB. Rwb requested from WB and MINIS the following evidence of assessment process: 1) Criteria used to determine project</p>	OP/BP 4.01 – Environmental Assessment

	viability, 2) Rules for cancelling inappropriate projects, 3) Process of project evaluation, used by WB team; 4) Participation of managers and stakeholders in project evaluation, and 5) Methodology of documenting evaluation outcomes. We never received a response from Khairy Al-Jamal (the current TTL) or Enkhbaatar.	
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## ANNEX 2: MATRIX OF POTENTIAL IMPACTS

The tables below illustrate the potential multiple harms from MINIS Project. We focus on the potential harms caused by the Component 1's Support for Infrastructure Investments, specifically on the Shuren Hydropower Plant and the Rural and Industrial Water Supply Scheme in the South Gobi region.

**Table 1. Environmental Impacts**

<i>Potential negative impacts</i>	<i>Environmental Impact type</i>	<i>Likelihood</i>	<i>Elaboration of Impacts</i>
Serious damage to populations of endangered fish species: Siberian Baikal Sturgeon, Taimen, Lenok, Baikal Cisco-Omul, Baikal White Grayling.	<b>Disruption of free movement of aquatic animals</b>	High	Dams block migration of fish and other organisms. Fish passages built to overcome this problem are usually completely ineffective on dams higher than 10 meters. As a result some species go locally extinct above or below the dam and some in the whole basin for they can no longer reach breeding areas upstream.
Damage to important fish populations spawning on sand and gravel riverbed (Siberian Baikal Sturgeon, Taimen, Lenok, Baikal Cisco-Omul, etc.)	<b>Disruption of flow of nutrients and sediments</b>	High	High— blocks or decreases movement of sediments and nutrients downstream.
Ice-free zone below dam during winter presents direct hazard to human and animal health. Cold water below dam also may disrupt riverside recreational activities in summer. Fish and other species are sensitive temperatures irregularities, which often destroy native population.	<b>Change of Natural Water Temperatures and ice regime. Health risks.</b>	Medium	By slowing water flow, dams increase water temperatures. Other bigger dams may decrease temperatures by releasing cooled water from the reservoir bottom. In colder climates some dams create damp unhealthy environment, especially harming in winter when people breath in ice particles formed due to unfreezing river surface. Ice cover downstream from the dam will be likely replaced by open water for some 10-several hundred kilometers downstream ( likely 20-100 km in case of Selenge River). Effect likely confined to Mongolia.
Decreased water availability in downstream areas, especially in dry years and as climate change progresses. Desiccation of shallow riverine habitats, including some spawning grounds, Change of natural character of Selenge Delta – Ramsar site Decrease in inflow into Baikal in dry year sequences, affecting lake ecosystem dynamics	<b>Reduction in Flow Volume</b>	Medium- High	a) In warmer and windier places such as Mongolia more than 800 -1000 mm of water evaporates from reservoir surface and less water flows downstream. Water is also lost to seepage in areas surrounding reservoir. b) Massive water withdrawals are planned in conjunction with Orkhon-Gobi Project and for coal-to-gas industry. c) In low-flow years like 2014 reservoirs would be struggling to store water and decrease its release downstream.

- Degradation \ Change of natural character of Selenge River Delta –Ramsar site due to reduction of high flows/floods - Floodplain ecosystem along Selenge river will be degraded and no longer maintain diversity of most productive habitats.	<b>Degradation and Reduction in riverine/riparian/floodplain habitat diversity, especially because of elimination of floods.</b>	High	Large Reservoir reduces flood pulse: floodplains do not get water and silt, backwater pools and oxbows are not cleaned by floods, braided channels simplify.
Major disruption of life-cycles of aquatic and amphibiotic animals and threat to pastoralist communities located downstream from dams	<b>Alter Timing of Flows and generating unnatural erratic flow pattern</b>	High	By withholding and then releasing water to generate power or store water for transmission reservoir can destroy natural seasonal flow variations that trigger natural growth and reproduction cycles in many species. Hydropower dams often completely stop river flow in off-peak hours. Effect likely confined to Mongolia.
Massive erosion and landslides, new dangerous environment to which local fauna and people are not adapted	<b>Creating artificial water body with unnatural ecology and unstable banks</b>	High	Reservoir with artificially fluctuating level is highly unnatural ecosystem unsuitable to most native river species. Erosion happens due to water fluctuation in reservoir and lack of sediments and artificial flushes downstream from the dam. Around Three Gorges Reservoir giant landslides necessitated forced relocation of additional 500 000 people. Erosion often activates downstream from the dam since water lacks sediment load. Effect likely confined to Mongolia.
Damage to ecosystems and native species of Selenge Basin from introduced exotics	<b>Spread of invasive exotic species</b>	High.	With change in water regime and habitat structure dam operation facilitates introduction of exotic species. (Dgebuadze 2009 identifies Selenge as a river with high risk of exotic invasions).
Decrease in water quality, accumulation of heavy metals and emission of GHG –methane.	<b>Decrease Oxygen Levels in Reservoir Waters, build-up of pollution</b>	Medium-High	Warm stagnant reservoirs are contaminated by high levels bacteria and algae, while organic matter decomposes at reservoir bottom and release pollutants. Heavy metals accumulate on reservoir bottoms with sediments. Huge number of poorly controlled placer gold mining operations using mercury makes massive build-up of mercury in reservoirs very likely.
-Deterioration in spawning and feeding conditions of many fish leads to decrease in fish and fish-feeding animals in rivers. - Potential threat to endemic species of Orkhon River basin <i>Cobitis olivai Naablant</i> (see Dgebuadze 2009, pp.303-304)	<b>Decrease in native fish populations basin-wide</b>	High.	Most of river system is frozen to bottom in winter and too warm in hot summers. Fish has to move from lower basin where it winters to spawning sites upstream and back. Reservoirs will also cut off flood-peaks and thus prevent phytophilic fish from reaching spawning sites Multiple dams will obstruct fish movements and likely contribute to population decrease.

			Decrease in fish-eating animals could be exemplified by Eurasian Otter –very endangered in Selenge Basin (see Red book of Mongolia).
Destruction of important terrestrial habitats in river valleys inundated by reservoir.	<b>Loss of terrestrial ecosystems</b>	High	Reservoir floods meadows, valley forests and other habitats displacing many native species. Effect likely confined to Mongolia.
GHG emission	<b>Climate change</b>	Medium	Reservoirs often reduce water quality and can emit highly potent greenhouse gases like methane NOTE: In the past the Egiin Gol Hydropower Plant did not get support through Clean Development Mechanism due to failure to show low levels of GHG emissions from future reservoir.
Damage from additional seismic risks to population and natural features.	<b>Increase in earthquakes</b>	Medium-	Baikal-Selenge region has high seismicity and reservoirs on Anaraga River are known to provoke earthquakes. Large dams are known to increase magnitude and frequency of earthquakes, especially when reservoirs are filling or emptying relatively fast.
Direct kill of aquatic organisms, including endangered fish	<b>Dam\machinery kills aquatic life</b>	Medium	Dam water release structures kill fish and smaller organisms due to water pressure and direct cutting by turbine blades.
Risk of catastrophic flooding due to dam failure.	<b>Faulty Design consequences and risk of breach or failure</b>	Low?	Medium-High. Dams often fail to release water at rates prescribed by agreed regulations, thus causing sudden flooding or drying of river valley. Many dams have collapsed, some causing huge human and material losses due to action of giant wave released downstream. In 2007 Zeiskaya Hydro in Russia could not hold the flood and washed away part of Ovsyanka village downstream. This risk is especially high if dam cascade is developed.
Health risks for humans and cattle	<b>Increasing disease - Health risks</b>	Medium	Medium. In warmer climates shallow reservoirs are best breeding habitat for vectors of various diseases like mosquitoes contributing to outbreaks of malaria, schistosomiasis, etc.
Disrupting human and animal movements on the river	<b>Limiting movements of wildlife, people and cattle</b>	Medium-Low	In winter changing water temperature may lead to disruption of ice-crossings vital for local transportation in downstream areas. In summer flow alteration leads to decrease in navigation capacity of the river. Reservoirs will obstruct old river-crossings for 30-70 kilometers of their length. Reservoirs will become ice-traps for wildlife, specifically for hooved animals and contribute to drastic reduction in their numbers through traumatism and increased predation.
Degradation of Lake Baikal world Heritage Site Universal Values.	<b>Indirect, Secondary and Cumulative impacts of the above</b>	Medium	Many impacts will result from alterations caused by upstream dams coupled with other factors via food chains, redistribution of ecological niches, nitration with climate-change effects, etc. Since Baikal is a huge

			relatively resilient deep-water lake ecosystem such impacts will have to develop over some time to become measurable. Much faster effects will be seen on near-shore shallow-water components from among which Selenga Delta is the most threatened and important area.
Degradation of Selenga River Delta Ramsar Wetland Natural Character	<b>Indirect, Secondary and cumulative impacts of the above</b>	High	Selenga River Delta plays important role in the overall Baikal ecosystem as a filter of various disturbances coming from Selenge Basin and as a nursery for many species of aquatic organisms, including most commercially valuable fish and majority of wetland birds. The Delta will be facing most direct and indirect impacts resulting from drastic alteration of Selenge Basin hydrology, sedimentation, migratory patterns due to dam building.

**Table 2: Socio-Economic Impacts**

<i>Potential negative impacts</i>	<i>Socio-economic problem</i>	<i>Likelihood</i>	<i>Elaboration of Impacts</i>
Inefficient public expenditure	<b>High Cost</b>	High	Electricity generation by hydropower has significantly higher development cost than other renewable or non-renewable alternatives: transmission from Russia, pumped-storage station, wind and solar, coal thermal, etc. So far two projects supported by MINIS – Shuren and Orkhon-Gobi. Effect likely confined to Mongolia.
Lower quality of water supply	<b>Low quality of supplied water</b>	Medium	Surface water is normally less clean than subsurface water. This means greater health hazard and greater expenditure for additional purification. Effect likely confined to Mongolia.
Burden imposed on future generation	<b>Price of decommissioning</b>	High.	When dam is no longer needed there is high cost of removing it and rehabilitating areas previously covered by reservoir water and often toxic sediments. Effect likely confined to Mongolia.
Redistribution of power and wealth from poor to the rich.	<b>Redistribution of wealth. Loss of community control over water to central government or corporate control</b>	High	Dam makes all residents of river valley downstream to depend on mercy of the reservoir operator who manages water releases. The purpose of the dam is to take water enjoyed by all population and make it serve specific economic enterprises. Large dams do it at a scale much larger than other water infrastructure.
Selenge dams may decrease water resources	<b>Damage to existing</b>	Medium	Baikal Lake is regulated by Irkutskaya Hydro under severe

available to Irkutskenergo Co.	<b>hydropower</b>		environmental limitations. Construction of dam cascade on Selenge will make management of Irkutskaya Hydro flow more complicated and likely reduce water resources available for generation in dry periods.
Selenge dams will confuse Baikal Lake level regulation regime	<b>Damage to water management system</b>	High	Baikal Lake regulation regime is very stringent due to conflict between hydro-generation and environmental management objectives. Shuren reservoir active storage is roughly equal to 10 centimeters of Baikal lake level, all planned Mongolian reservoirs are equal to 25 centimeters. New artificial regulation in another country upstream will make achieving objectives in lake level management close to impossible. For example, in December 2014 there was so little water in Baikal that Russian Government could hardly satisfy all users and sustain environmental flow norms. If there was cascade of dams upstream competing for this scarce water situation would become unmanageable.
Displacement of local residents	<b>Displacement of local residents</b>	High.	Anyone who lives in place of created reservoir and subsurface inundation zone around it would be displaced and needs resettlement. 30-100 resident families will be displaced by each planned reservoir. Pipeline to Gobi construction may lead to displacing even more families. Effect likely confined to Mongolia.
People deprived of livelihood	<b>Loss of livelihood (pastures, fisheries, etc.)</b>	High.	Anyone who lives in place of created reservoir and subsurface inundation zone around it can no longer use these areas. In addition fish stocks are often decreased basin-wide and floodplain pastures desiccated for several hundred kilometers downstream. Broad spectrum of local people in the reservoir area, along rivers downstream and in the Lake Baikal area would be affected.
Loss of cropland due to Shuren reservoir floods grain fields	<b>Loss of arable land</b>	High	Grain security seemed to be a priority in Mongolia, especially when economy is in poor shape. Just Shuren reservoir could destroy more than 10 % of arable land of Bulgan Province.
Threat to Erdenet City water supply	<b>Disrupting water-supply</b>		Most designs of Shuren Hydro shown to us in the past were putting at risk existence of Erdenet City water supply system – most efficient infiltration water intake in Mongolia.
Damage to Baikal cisco-Omul fisheries	<b>Loss of industrial fisheries</b>	High	Baikal cisco-Omul fisheries are important local business with significant part of fish migrating up Selenga river and spawning sites divided between Russia and Mongolia. It has been proven by Baikal Fisheries Agency that Baikal cisco-Omul is negatively affected by decrease in sand and gravel on the Selenge river-bed where it spawns.

			Upstream dams will result in change in flow pattern and blockage in sediment transport thus likely severely affecting Omul spawning habitat river-wide.
Loss of many local fishing-camps	<b>Loss of recreational fisheries</b>	Medium	Taimen, lenok, grayling, and other reophilic fish are the basis for burgeoning fishing-tourism, primarily in Mongolia. Conversion of rivers into reservoirs, blocking fish passage by dams, change in flow of sediments and water will reduce resources for sport-fisheries, increase competition, contribute to depletion of resource-base of this business.
Damage to landscapes\riverscapes used for tourism	<b>Loss of ecotourism value and potential</b>	Medium	Negative changes to Selenge \Baikal ecosystems may lead to decrease of its use by tourists. Even greater is the damage to perceived “pristine river-delta-lake”, because ecological tourists are less likely to be attracted to ecosystems known to be affected by negative human impacts. Dammed Selenge river loses great part of its ecotourism potential.
Decrease in sediment flow deprives downstream business of construction material	<b>Damage to construction business</b>	Medium	Selenge is known to be dredged for gravel and sand for construction purposes. Dam will stop sediment flow and it may increase competition for construction material downstream.
Loss of productivity pasture meadows along Selenge and in the delta	<b>Damage to livestock industry</b>	High	Floodplain meadows are important grazing resources for local livestock producers that become critically important in sequence of dry years when grass is scarce in the steppe. Alteration of flood cycle will decrease productivity of floodplain meadows and deprive local livestock producers in Mongolia and Russia of important pastures and hay-fields during droughts.
Induced social tension due to migrants	<b>Influx of newcomers (e.g. construction workers).</b>	High	Construction requires many workers normally brought from different region or other country, which may cause competition and conflicts with local population. Effect likely confined to Mongolia.
Increased corruption risks	<b>Corruption and ineffective spending of public money</b>	High.	This is actually the dam is so much preferred option for officials and engineering firms – much larger portion of benefits go into their pockets and much more questionable expenditures are made. Large complex projects are very difficult to control, in contrast to building a well.
Burden imposed on public finance	<b>Increasing debt burden</b>	High.	To build dams governments take loans and often cannot pay them back. Effect likely confined to Mongolia.
Risk imposed on public finance	<b>Increasing cost during construction</b>	High	High. Recent study from Oxford University shows that an average the cost of large dam construction worldwide has been twice larger than written into initially approved projects and construction lasted 2-3 times longer than planned. This is more than overspending and delays in case of lighter water infrastructure and roads.

			Effect likely confined to Mongolia.
Risk imposed on public finance	<b>Risk of stranded assets</b>	High.	Likelihood that water supply system is no longer needed is high and for energy supply it is even higher. In the past in Mongolia Kharkhorin irrigation and hydropower system built by Chinese is a classic example: hydropower plan has been shut down and irrigation complex uses 10-15% of the originally irrigated area in Orkhon River Valley. Effect likely confined to Mongolia.
Provoking tensions with friendly neighbors	<b>Potential for transboundary conflict and difficult negotiations</b>	Medium-High	Dam has so many more consequences for downstream country than just a water withdrawal, that it is likely to create much greater controversy with neighbor country.
Damage to global environmental assets	<b>Threat to fulfilling obligations under conventions</b>	High.	The Selenga River Basin contains areas subject to protection under international conventions. Harming ecological integrity of such areas normally goes against country's obligation under those conventions.
Selenge River will lose its "free-flowing character"	<b>Loss of symbolic values</b>		"Free-flowing character" is not only ecological, but also cultural phenomenon. The greatest river of Mongolia is valued by many conservation-minded people for being free from major infrastructure. This value will be lost if dams are built.
Assault on indigenous values	<b>Damage to indigenous cultures</b>		Mongolian Shamanism considers rivers as very special places and special rituals are undertaken to worship spirits of each large river. Construction of a dam clearly contradicts traditional worshipping of natural rivers.
Inundation of river valleys where several historic nations were formed	<b>Loss of historic heritage and cultural landscapes</b>	Medium	Orkhon and Selenge river valleys are known to be a place of formation of Hunnu, Turcik, Mongolian and Buriat nations. Reservoirs, inundating substantial part of river valleys, will likely flood many cultural relics and landscapes of cultural importance. Effect likely confined to Mongolia.

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### **ANNEX 3: DOCUMENTATION OF ENGAGEMENT WITH WORLD BANK STAFF<sup>2</sup>**

*The following letters outline the engagement Russian and Mongolian groups have had with the MINIS Project staff and World Bank senior management since 2012.*

- Annex 3.1.** Letter from Marianne Moore, Wellesley College to World Bank Mongolia Country Staff, 18 September 2012 and Bank response
- Annex 3.2.** Letter from Alexander Arbachakov, Sosnovko to President Kim, 29 September 2012
- Annex 3.3.** Response to Sosnovko letter from Klaus Rohland, Mongolia Country Director, 25 October 2012
- Annex 3.4.** Letter from Greenpeace Russia to President Kim, 22 November 2012
- Annex 3.5.** Response to Greenpeace Russia from Klaus Rohland, Mongolia Country Director, 27 November 2012
- Annex 3.6.** Letter from Sukhgerel Dugersuren, Rivers without Boundaries to Khairy Al-Jamal, MINIS Project TTL, 12 May 2014
- Annex 3.7.** Response to Rivers without Boundaries letter from Tungalag Chuluun, Acting Mongolia Country Manager, 19 June 2014
- Annex 3.8.** Letter from Greenpeace Russia to President Kim, 1 September 2014
- Annex 3.9.** Response to Greenpeace Russia letter from James Anderson, Mongolia Country Manager, 3 October 2014

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<sup>2</sup> This list does not include the meetings and personal communications Rivers without Boundaries and their partners have had with World Bank staff.

## **ANNEX 4: ELABORATION OF PROBLEMS WITH STAKEHOLDER ENGAGEMENT AND PROJECT OVERSIGHT**

### **Stakeholder engagement**

1. Disclosure and stakeholder involvement: late and limited disclosure of pre-feasibility report and TOR put up for discussion.
2. Stakeholder discussion announcements are released 1-2 days before the event, which does not allow all interested parties to attend. Rwb was the only party concerned with the project; the rest were loud supporters making remarks such as “if at all you call yourselves Mongolian”.
3. Local community members are not informed, not present at consultations, and do not have access to documents as evidenced by statements made by a local governor and association of bee-farms. The Mongolian Association of Bee-farmers was not invited, they had heard about the discussion and came to state that impact assessment does not include cover all sites and endangered species of honey-bearing plants essential for their business. Selenge soum will be affected by both Eg and Shuren HPP, yet the local government has no information on what impacts to expect.
4. Differences in the Mongolian and English language content of documents indicate that texts cater to different audiences with differing messages. Example: the requirement to disclose pre-feasibility study documents to interested bidders available in the English text does not appear in the Mongolian. Or “cost-effective resettlement and mitigation measure” is translated into Mongolian as “low-cost” measures.
5. The Mongolian TOR for the Orkhon project directs the ESIA consultant to carry out field evaluation in the project area, which on the map includes only areas to benefit from project. It also directs the evaluation from the position of “project is possible”.
6. Russian government and other stakeholders of the riparian have not received from WB or GOM due notification regarding approval of pre-feasibility studies and start of next planning phase for dams in Selenge river basin<sup>3</sup>. , More than that, when
7. The World Bank project did not seek opinion of independent experts such as World Heritage Center or any other authoritative third-party regarding potential impacts on these internationally protected sites.
8. Stakeholders from potentially affected Russian communities were not

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3 According to objectives of the MINIS Project, reflected in Appraisal document (para 21, etc.), this decision means that projects are prepared for investment tender and with IFC as transaction advisor to pilot PPP transactions. This clearly violates OPBP 7.5.

included in public consultations, no consultations related to pre-feasibility study, FS and ESIA have been organized in Russia, project documents and drafts for discussion are not available in Russian.

9. Such important stakeholder as the World Heritage Committee representing Convention has been not been notified by the GOM and the draft ESIA and FS TOR for dam projects are being finalized without consideration to the WHC recommendation to carry out a reactive monitoring mission issued in June 2014.
10. Quality of documents and stakeholder engagement process do not meet the minimum WB standards.

**An independent monitoring body should monitor compliance with WB policies, specifically:**

1. Compliance of assessment TORs for ESIA;
2. Stakeholder engagement processes, starting with the process of identifying all stakeholders, especially those to be harmed by project impact;
3. The process of mapping critical natural resources and cultural sites essential to local communities and businesses;
4. Ensure that resettlement and mitigation plans are in compliance, in order to not to repeat the Oyu Tolgoi complaints;
5. Ensure that Cumulative Impact Assessment for all dams planned in Selenge river basin is undertaken with proper involvement in public consultations of all relevant stakeholders from all areas of potential impacts.
6. The public consultations, oversight process should fully include experts appointed by the World Heritage and Ramsar Conventions, as independent bodies accepted by both riparian signatories and have extensive international experience in similar projects worldwide.
7. Remind the Mongolian government that it has a duty to comply with the WB policies in activities that are financed by the WBG; and
8. Call upon the Mongolian government to first carry out a thorough assessment of the impacts of Taishir and Durgun HHP on local communities to inform the ESIA process for these three HHP projects. Engage affected local community members in the stakeholder discussions as well as in the development of the ESIA social impact assessment methodology.

10 Февраля 2015

**Исполнительному секретарю  
Инспекционного совета**

Всемирный банк  
1818 H Street NW, MSN 10-1007  
Washington, DC 20433  
USA

Мы, нижеподписавшиеся представители общественности и местных жителей из Монголии и России, совместно объединились, чтобы подать жалобу на финансирование Всемирным банком проекта технической поддержки Монголии (на сумму 25 млн. долларов США), известного как «Проект поддержки инфраструктуры для горнорудной отрасли» (МИНИС).<sup>1</sup> Мы серьезно озабочены потенциально наносимым проектом ущербом, который игнорируется и недооценивается Рабочей группой (РГ) Банка и Группой реализации проекта (ГРП МИНИС). Мы также выявили значительные нарушения установленных правил, во время продвижения проекта Всемирным банком.

Разделы проекта МИНИС, в частности, содержащиеся в Компоненте №1 «Поддержка инвестиций в инфраструктуру», и в особенности такие подпроекты как "ГЭС «Шурен»" и "Регулирование стока реки Орхон и строительство комплекса водохранилищ"<sup>2</sup>, продолжают страдать от недостатка научных исследований рисков и планирования мер по их превентивному снижению, отсутствия оценки альтернатив предложенным проектам, неправильной процедурой выбора площадок для строительства, и нарушениями при отборе консультантов, а также недостаточными консультациями с общественностью и организациями гражданского общества. РГ и ГРП МИНИС крайне неадекватно осуществляют выбор инвестиционных подпроектов. Например, ими продвигается проектирование двух больших плотин без проведения оценки альтернативных вариантов и с неполным выполнением инструкций Банка по экологическим и социальным мерам защиты (WB Safeguard policies).

Хотя в данный момент Банк выделяет средства лишь на создание пред-ТЭО и ТЭО вышеупомянутых подпроектов, мы глубоко обеспокоены тем, что поддержка Банком этих разработок будет служить отправной точкой для инвестирования в реальные инфраструктурные проекты в будущем. Продвигаясь вперед с исследованиями без критической оценки кумулятивных и трансграничных воздействий, Банк одобряет противоречивый план Правительства Монголии по созданию крупных ГЭС. Непродуманные проекты ГЭС экономически невыгодны, и представляют социальный и экологический риск для Монголии, которая страдает от нехватки воды. К настоящему времени в бассейне реки Селенга разрабатываются ещё 2-3 проекта ГЭС.

Открытый доступ к документам проекта и широкие целенаправленные консультации с подвергающимся угрозе населением, гражданским обществом, учеными и другими ключевыми заинтересованными сторонами – все это критически важные составляющие при разработке таких проектов. Но практика Всемирного банка нас очень тревожит. Несмотря на несколько встреч с представителями Банка в Вашингтоне и в Монголии, проведенные за последние два с лишним года (некоторые описаны в Приложении 3), мы не удовлетворены полученными ответами и не видим разрешения поднятых нами проблем, включая отсутствие доступа к проектным документам, низкое качество проведения слушаний и консультаций с

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1 *Посмотрите:* <http://www.worldbank.org/projects/P118109/mn-mining-infrastructure-investment-supp?lang=en>; *Также:* <http://www.minis.mn/>.

2 Также известен как «Перевоска части стока реки Орхон в Гоби» или "Орхон-Гоби".

заинтересованными сторонами, недостоверные оценки рисков, сомнительные критерии выбора подпроектов и отсутствие оценок правильности выбора проектных решений.

Тот факт, что Банк проявляет неспособность к решению этих важнейших задач, является нарушением его собственной политики по мерам защиты, доступа к информации и надзору за выполнением проекта. Всемирный банк обязан неукоснительно придерживаться своих собственных правил и инструкций. Тем не менее, после двух лет взаимодействия с Банком по данному проекту и просмотра доступных нам документов проекта, мы считаем, что Всемирный Банк не вполне выполняет требования собственной политики по "мерам экологической и социальной защиты" и действует вопреки заявленной официальной линии.

В нарушение инструкции «Оценка воздействия проекта на окружающую среду» (ОР/ВР 4.01 [1999 г.]), Банк не разработал ни плана снижения рисков в рамках подпроектов, которые будут иметь значительное экологическое влияние, ни оценки возможных альтернативных технологий и мест размещения объектов, и даже не рассмотрел нулевой вариант без реализации подпроектов. Даже в "Основах экологических и социальных мер защиты" (ОЭСМП) МИНИС нет ни должных процедур контроля, ни общественного участия, ни плана раскрытия информации, ни механизма учета наших мнений. В Приложении 1 мы подробно излагаем нарушения политики и инструкций, совершенные Банком.

Эти задачи требуют строгого соблюдения правил и инструкций Банка, потому что нет обоснованной уверенности в том, что риски реализации проектов крупных плотин, таких как предполагаемые ГЭС «Шурен» и плотина для переброски реки Орхон в Гоби, не перевешивают заявленные выгоды.<sup>3</sup> Кроме того, Комитет всемирного наследия ЮНЕСКО в решении 38-й Сессии Комитета в 2014 г постановил, что «Комитет просит Монголию, как страну-участницу Конвенции, пригласить реактивную мониторинговую миссию МСОП с одновременным приглашением властей Российской Федерации для того, чтобы исследовать рамки, масштабы и статус проектов строительства плотин в Монголии и обсудить потенциальное воздействие этих проектов на объект (озеро Байкал) в начале процесса планирования».

Из-за того, что Банк не следует своим правилам и инструкциям и никак не разрешает поставленные нами процедурные и содержательные вопросы по подпроектам, мы глубоко озабочены тем, что эти проекты могут оказать необратимое негативное воздействие на экологическое состояние бассейна реки Селенги и на озеро Байкал, равно как и на социально-экономические проблемы населения, зависящего от этих ресурсов, как мы ниже кратко описываем. (В Приложении 2 мы подробнее описываем потенциальный ущерб от подпроектов).

#### *Воздействия на окружающую среду*

- Негативное влияние на сток рек и миграции живых организмов. Например, плотины, возможно, будут препятствовать миграции редких видов рыб, а также снижать численность рыбных стад;
- Ущерб экосистемам Селенги и местным видам<sup>4</sup>, например в связи с проникновением чуждых видов-интродуцентов, что приводит в дальнейшем к прямому уничтожению видов рыб, которые уже находятся под угрозой вымирания;
- Ухудшение качества воды и ухудшение условий водоснабжения;

3 Посмотрите: "Large hydro-electric dams unviable and seriously damaging to emerging economies", University of Oxford, 10 March 2014 (<http://www.sbs.ox.ac.uk/school/news/press-office/press-releases/large-hydro-electric-dams-unviable-and-seriously-damaging-emerging-economies>).

4 В долине Селенги затопляемой водохранилищем Шурен обитают растения относящиеся к по крайней мере 40 семействам, 163 родам и 241 виду и они будут уничтожены в ходе проекта.

- Деградация водно-болотных угодий, в том числе таких ключевых местообитаний как поймы и дельта Селенги;
- Аккумуляция токсичных тяжелых металлов, в т.ч. ртути, несущих ущерб здоровью людей;
- Дополнительное выделение парниковых газов, в т.ч. метана ведущих к изменениям климата;
- Потеря геологической устойчивости и увеличение риска оползней, эрозии, землетрясений, а также наводнений, по причине катастрофического разрушения плотины;
- Дополнительный стресс для непредсказуемо меняющегося водного режима рек и озер. усугубление последствий маловодья, особенно вследствие переброски в Гоби. Уменьшается объем стока рек, как в Орхоне, и данные показывают, что в современных условиях река Орхон не выдержит переброски вод в регион Южной Гоби;
- Деградация озера Байкал участка Всемирного Наследия, из-за изменения характера и процессов экосистем реки Селенги.

#### *Социально-экономическое воздействие*

- Станут недоступны традиционные водные и пастбищные ресурсы для кочевников в Булгане, Хувсгуле, Сэлэнгэ, Увурхангае, Дундгоби, в краях Южной Гоби Монголии;
- Утрата природных ресурсов, например, рыбных запасов в реке Селенге, будет усиливать конкуренцию среди тех, кто зависит от рыбных запасов;
- Затопление водохранилищем экономически важных почв, особенно пахотных и пастбищных земель, а также деградация пойменных земель;
- Потенциальное переселение 30-100 домохозяйств из ложа каждого водохранилища и еще большего количества хозяйств с трассы водовода;
- Уменьшение возможностей для развития экотуризма и утрата доступа к традиционным ресурсам для местных бизнесменов, которые зависят от ресурсов реки и озера, что представляет угрозу банкротства для уже существующих экотуристических компаний;
- Потеря археологических памятников культурного значения в бассейне реки Селенги. Местными шаманами Монголии и Бурятии реки Орхон и Селенга и озеро Байкал считаются священными;
- Потеря урожаев из-за затопления земель;
- Потеря важных экологических функций критически-ценных местообитаний;
- Утрата популяций редких видов, включая некоторые медоносные растения, что приведёт к ущербу для пчеловодства;
- Потеря пойменных лесов при создании водохранилища ГЭС «Шурен».

Учитывая масштабы потенциального ущерба, от которого население и в Монголии, и в России будет страдать еще в течение многих лет, а также продолжающиеся нарушения Всемирным банком своих правил и инструкций, мы просим, чтобы Инспекционный совет провел расследование по проекту МИНИС.

Помимо всего прочего, мы просим, чтобы не раскрывали наши имена, ввиду рисков безопасности истцам.

С уважением,

СПИСОК ПОДПИСАНТОВ ИЗ РОССИИ И МОНГОЛИИ ПРИЛАГАЕТСЯ