

Waste management in Uzbekistan: landfills are not enough.

Horezm Solid Waste Project

Background information

The European Bank for Reconstruction and Development (EBRD) is considering the provision of USD 50 million loan (project #50697¹) to the Republic of Uzbekistan for Horezm Toza Hudud, a state unitary enterprise owned by the State Committee for Ecology and Environmental Protection, to finance the construction of new European Union (EU) compliant sanitary landfills, wastesorting plants and waste transfer stations. The project is financed under the Green Economy Transition (GET) direct track. It is expected to bring significant health and environmental benefits and result in greenhouse gas emissions savings. The approval date is scheduled for 27 October 2021.

Access to information

In June 2021, local activists tried to obtain project information to review the environmental and social risks involved in the project. They carefully studied the website of the State Committee for Ecology and Environmental Protection,² but could not find any relevant project-related information nor an Environmental and Social Impact Assessment (ESIA). They sent a request for information to Khusniddin Allayarov, the contact person at the State Committee for Ecology and Environmental Protection³ who is referenced in the EBRD project documentation. They did not receive any response. After contacting the representative of Toza Hudud for the Kushkupyrsky and Bogatsky regions, they managed to obtain the ESIA.

Project documents

Analysis of the available project documentation (in Russian), in particular the environmental impact assessment conducted for the landfill in the

¹ European Bank for Reconstruction and Development, [Horezm Solid Waste Project](#), disclosed 2 April 2021, accessed 30 July 2021.

² State Committee of the Republic of Uzbekistan on Ecology and Environmental Protection, [website](#), accessed 30 July 2021.

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For more information

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CEE Bankwatch Network's mission is to prevent environmentally and socially harmful impacts of international development finance, and to promote alternative solutions and public participation.

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Kushkupyrsky region (2020) and the Bogatskiy region (2020) for land plot selection, identified the following deficiencies:

- The project design does not include any waste segregation for excluding highly toxic substances and decreasing the volume of disposed waste, nor any proposals for incentivising recycling and capturing biogas.
- Information concerning potential air pollutants is inadequate and incomplete; there is no data about estimated greenhouse gas emissions, nor their cumulative impact.
- Indeed, there is a clear indication of some pollutants potentially exceeding tolerable levels, but no assessment is made of the potential health impact for workers and local communities.
- Proposed mitigation measures such as forestation are very limited and lack measures for performance assessment.
- No information is offered on the impact and mitigation of smells, which is frequently a major concern for the workers and residents.
- The absence of baseline data on air pollution makes assessment of cumulative impact impossible.
- Despite confirmed evidence that underground water is located close to the surface, the potential negative impact is considered as zero. There is no information about the effectiveness of the technologies proposed to isolate the landfill body, nor are any specific requirements set out to ensure that there is waterproofing, allegedly on account of the low humidity of the region and the waste itself. Any potential for accident with the insulating layer is neither considered nor assessed.
- There is no information about the impact on the fish pond and irrigation canals located next to the project sites.
- The project documentation determines that the impact on the surrounding fauna is non-existent (no evidence is provided), and any comprehensive impact on flora and crops is completely ignored in spite of the close proximity of agriculture lands. Accordingly, no mitigation measures are developed or proposed.
- The project description does not provide any information about a sanitary protection zone or potential health impacts, even though settlements are located within 750-900 metres.
- There is no impact assessment for the decommission stage, verified technology for remediation, or any information on funding sources to ensure safe and effective site rehabilitation.

- The decrees of the local administration do not contain precise coordinates of the land plots to be acquired for the project. This can increase risks with regard to the land acquisition process and potential land loss for local people.

Site visit

In June 2021, local activists visited the proposed project sites in the Kushkupyrsky and Bogatsky regions and met local people, who confirmed that no information about the project had been disclosed to them. In the Bogatsky region, people complained that the existing landfill bothers them with both smells and toxic fumes. In the Kushkupyrsky region, as a result of their complaints, the local farmers were promised that the landfill would be moved away.

Finally, during site visits, the activists discovered that certain existing facilities had not been identified in the ESIA, including; a tea parlour (400 square metres) located some 100 metres from the project site; a fishpond (of 6 hectares) located some 450 metres from the project site; and an unfinished building (400 square metres).

Karakalpakstan Solid Waste Project

Background information

The European Bank for Reconstruction and Development (EBRD) is considering the provision of USD 70 million loan (project #50696⁴) to the Republic of Uzbekistan for Karakalpakstan Toza Hudud, a state unitary enterprise owned by the State Committee for Ecology and Environmental Protection, to finance the construction of new EU compliant sanitary landfills, waste sorting plants and waste transfer stations. The project is financed under the GET direct track. It is expected to bring significant health and environmental benefits and result in greenhouse gas emissions savings. The approval date is scheduled for 27 October 2021.

Access to information

In June 2021, local activists tried to obtain project information to review the environmental and social risks involved in the project. They carefully studied the website of the State Committee for Ecology and Environmental Protection,⁵ but could not find any relevant project-related information. They sent a request for information to Khusniddin Allayarov, the contact person at the State Committee for Ecology and Environmental Protection⁶ who is referenced in the EBRD project documentation. They did not receive any response.

Consequently, local activists reached out to Karakalpakstan Toza Hudud (the state unitary enterprise) and managed to get information about the location of the proposed landfills. Their representative refused, however, to provide any project information, since allegedly this was

⁴ European Bank for Reconstruction and Development, [Karakalpakstan Solid Waste Project](#), disclosed 13 April 2021, accessed 30 July 2021.

⁵ State Committee of the Republic of Uzbekistan on Ecology and Environmental Protection, [website](#).

⁶ khusniddin.allayarov@eco.gov.uz

not sanctioned by the government. The representative also confirmed that no public consultations would be arranged, as the distance from the project site to the nearest settlements is over a kilometre.

Finally, on 23 June 2021, the activists sent a request to the EBRD asking for the disclosure of project documentation. The EBRD replied saying that the ‘relevant project documents will be disclosed in proper time’, without offering any further clarification regarding either timelines or the types of documents they would disclose.

Site visit

In June 2021, activists visited the project sites in Karakalpakstan and talked to local people. In the Turtkulskiy region, the landfill (constructed in 2017) is located in the Shurakhan settlement. Residents are not aware of the landfill extension, and also complained about insects coming from the landfill, especially during the summer months. Insect control requires chemical application costing around USD 14 per month, a substantial sum for them.

In the Kungradskiy region, the landfill is located in the Kanly settlement. Two hundred and fifty to three hundred metres from Kanly, there is a water canal used by the residents for irrigation – this is within the sanitary zone of the landfill and local people need to understand the potential impacts.

In the Karauzyakskiy region, the landfill is located in the Berdakh settlement. There are houses all along the perimeter. Residents are aware of the landfill expansion, but oppose it, suggesting an alternative site 2 kilometres away.

Uzbekistan context

Current legislation⁷ on environmental review in Uzbekistan does not require any disclosure of information concerning environmental and social risks, nor does it propose any requirement for public consultations. Given the absence of an advanced waste segregation system and the potential toxic waste generated by households in Uzbekistan, the proposed projects can have substantial impacts on the environmental, human health and livelihood concerns of the affected communities. The EBRD should therefore ensure transparency of the projects and meaningful stakeholder engagement, even if the project is labelled a category B project.

Recommendations

1. Ensure the projects include waste prevention, separate collection, and recycling, in line with the EU's circular economy approach.

⁷ The current legislation can be found at LexUZ, [ЗАКОН РЕСПУБЛИКИ УЗБЕКИСТАН ОБ ЭКОЛОГИЧЕСКОЙ ЭКСПЕРТИЗЕ](#), 25 May 2000. (Bulletin of the Oliy Majlis of the Republic of Uzbekistan, 2000, No. 5-6, Art. 144; Collected Legislation of the Republic of Uzbekistan, 2011, No. 1-2, Art. 1; 2017, No. 37, Art. 978; National database of legislation, 04/29/2021, No. 03/21/688/0394).

2. Ensure compliance with the EU's Environmental Impact Assessment (EIA) directive.
3. Ensure disclosure of the projects' Environmental and Social Impact Assessment (ESIA), Environmental and Social Action Plan (ESAP), Land Acquisition and Resettlement Plan (LARP), and Stakeholder Engagement Plan (SEP).
4. Conduct public consultations before the project approval to provide an opportunity for verification of information with civil society and local communities, in line with the EBRD's environmental and social standards.
5. Meaningfully engage the stakeholders in the decision-making, implementation and monitoring processes of the project, so that the concerns of the affected communities can be addressed, especially with regard to land acquisition, economic displacement, and the health and environmental impacts.