

Kungrad 1-3 wind power project, Uzbekistan

Comments by CEE Bankwatch Network on the draft ESIA disclosed in December 2023



Some of the last nests of steppe eagle in Uzbekistan might be impacted by the project (photo: CEE Bankwatch Network, 2024).

Our detailed comments refer to the draft [environmental and social impact assessment \(ESIA\) report disclosed on 21 December 2023 on the ADB website](#) for a 1.5 GW project (hereafter the Project), which includes Kungrad 1, 2 and 3 in Uzbekistan. The ADB website includes the *Kungrad 1 Wind Power BESS Project* and the *Kungrad 3 Wind Power BESS Project* separately, each with 500 megawatts (MW) capacity.

The comments were submitted by Bankwatch to the ADB in March 2024. BirdLife International, the Uzbekistan Society for the Protection of Birds (UzSPB) and the Chairs of the IUCN SSC Bustard Specialist Group submitted their own comments to the ADB. As of March 2025 the draft ESIA is still under review and the ADB has not approved funding for the project.

Meanwhile in January 2025, the [Asian Infrastructure Investment Bank \(AIIB\) approved a USD 150 million loan](#). Ignoring the fact that ADB is the lead bank in the process, the approval was based on the same [draft ESIA from December 2023](#).

For more information

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The ADB, AIIB and other lenders should reconsider funding for Kungrad 1, 2 and 3 and other projects in the Ustyurt Plateau as these could have significant impacts on the recently declared Cold Winter Deserts of Turan UNESCO Heritage Site, national protected areas, threatened species and habitats and more than a dozen international environmental initiatives to which Uzbekistan has committed.

This project is one of several huge proposed renewable projects in very remote wild areas in Central Asia with long transmission lines – a worrying trend not in line with the best practices for energy transition.

Detailed comments:

1. **Concerns about the Project's direct and induced impacts on the Cold Winter Deserts of Turan UNESCO Heritage Site and the Ustyurt National Park:** The Ustyurt National Park was declared in 2020 and the Cold Winter Deserts of Turan UNESCO World Heritage Site was [declared in 2023](#) and includes the national park. The draft ESIA doesn't include any special assessment on the impacts on the national park and the UNESCO site, and does not follow the [UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context](#). The draft ESIA does not even mention the declaration of the UNESCO site in 2023.
2. **No cumulative impact assessment:** Aside from the proposed Project, infrastructure already exist on and close to the Ustyurt plateau that potentially affects the southern migration of ungulates, including a railway and an ADB-funded road project (i.e. Central Asia Regional Economic Cooperation Corridor 2 Karakalpakstan Road (A380 Kungrad to Daut-Ata Section) Project), so there could be cumulative impacts.

There are also other potential wind projects on the Ustyurt plateau undergoing surveys currently. It is not clear why these projects are not mentioned in the ESIA as, to the best of our knowledge, some are promoted by the same company, ACWA Power. The cumulative impacts on birds, mammals (for example on migration) and other biodiversity features have not been studied and the conclusion reached is therefore wrong: *'Any species of conservation concern affected by other projects are unlikely to move to the Project site and be affected again. In addition, migrating birds are not a key issue due to distance.'*

3. **No landscape-scale assessment and failure to take into account the results of the Strategic Environmental and Social Assessment (SESA) process for renewable projects in Uzbekistan:** We have been informed that ACWA Power is conducting studies for the second phase of the Project, located east of the current site. The government has awarded a concession for the area to the company. There is also a plan for a third project on the Ustyurt plateau, though it is not clear whether studies have begun. The allocation of land for these new wind projects on Ustyurt is not taking into account the fact that a Strategic Environmental and Social Assessment (SESA) is being developed for renewable projects in Uzbekistan.

Land allocation for huge wind projects like Kungrad, should only be done once the SESA is finalised, and only if the areas in question are found to be suitable for wind power development. The area of the Project is huge, in remote areas with no real ecological borders. A landscape scale assessment is needed, including how converting the natural habitats into industrial sites would impact its biodiversity features.

4. **The Critical Habitat assessment and the measures for Priority Biodiversity Features are over-simplified** with no guarantee that there will be no net biodiversity loss. For example, according to the authors, honey badgers (*Mellivora capensis*) and caracals (*Caracal caracal*), which are critically endangered according to the Red Data Book of Uzbekistan, do not trigger critical habitat assessments. The predicted mortality of the steppe eagle (*Aquila nipalensis*, globally endangered) and other birds, and the additional mortality of the species due to the transmission lines and other wind farms in the Kyzylkum desert (proposed or under construction) are not taken into account to assess the cumulative impacts on the populations. Buffer zones of two kilometres from nests of steppe eagle and 500 m from nests of long-legged buzzards are based on a guidance published by NatureScot, which is not appropriate for Uzbekistan (both species are not found in Scotland). The project does not demonstrate no net biodiversity loss.
5. **Unclear final layout and ongoing request for a setback/buffer zone:** Due to the Project's proximity to the national park, the relevant government agency has requested a setback of 10 kilometres from the park. ACWA Power didn't agree to the buffer and according to the draft ESIA, this is an ongoing issue and an official response is yet to come through. Nevertheless, the whole project design is done as if a much smaller buffer is already approved which is very worrying – the conclusions might vary significantly depending on the Project design.

Moreover the draft ESIA does not propose a final number and size of the wind turbines – but draws a likely incorrect conclusion that fewer larger turbines have a smaller impact.

The national park area adjacent to the Project site is reportedly habitat for important species (see section below).

Yet the draft ESIA doesn't evaluate alternative locations with varying distances from the national park/UNESCO site. The setback/buffer zone should be consulted with UNESCO and only after that could the final project design and ESIA be completed.

6. **Significant impacts on threatened mammals on the Ustyurt plateau:** The project would open new access roads in a very remote area, would significantly change its natural habitats and would create a barrier for the migration (temporary or permanent) of mammals. The construction works would also lead to significant disturbance. These impacts have not been studied in accordance with the size of the Project (1.5 GW) and the project area – **one of the wildest and most remote places in Asia**. As explained in the draft ESIA it is very rarely visited by any people and there are almost no human activities. Currently it takes more than 8 hours to drive from the closest settlement to the project site.

Once the 200km access road is built, it will provide easy access to poachers and it would be difficult to restrict access and monitor/secure the national park and its surrounding areas. The proposed mitigation measures are completely irrelevant in such a wild place with no way to control who and when uses the access road.

Maintaining the natural migration corridors for ungulates, such as the Asiatic wild ass (Near Threatened – NT), goitered gazelle (Vulnerable – VU), and Transcaspiian (Ustyurt) urial (VU), which migrate between Kazakhstan, Turkmenistan and Uzbekistan, is crucial for their survival and for the

integrity of the UNESCO Heritage Site which has different clusters in different parts of the Ustyurt plateau, in Kazakhstan and Turkmenistan. A probable future increase in Saiga antelope (NT) population in the north of the plateau (Saigachiy protected area) should restore the historical range in the south of the plateau. The draft ESIA mentions that an old saiga horn and another carcass was found in the project area. It is well known that the saiga has the quickest reproduction rate of all ungulates. The recovering population will re-establish the natural migration route through the Project area.

During the Convention on Migratory Species COP meeting in Uzbekistan in February 2024, the Uzbek and Kazakh governments agreed to open mammal passages on the border fences to enable the natural migration of mammals. The Project will impact this migration, but the displacement and barrier effect have not been studied.

Moreover, it is not clear how the mammal study methodology in the ESIA is aligned with the scientific literature. For example, there is no proof that the camera-trap density, location, time-duration of camera trapping and interpretation of the results is sufficient to assess the current state of mammal populations of the Ustyurt plateau. The study should have also been carried out over a much larger area as large mammals are known to migrate hundreds of kilometres per week. The migration routes, potential recovery of populations and future use of the project area by threatened mammals is not assessed at all.

7. **Non-alignment of the project with the commitment of Uzbekistan to reintroduce the Asiatic cheetah on the Ustyurt plateau where it used to live until the 1980s:** At the 14th Conference of the Convention on the Conservation of Migratory Species of Wild Animals (CMS COP14), [Uzbekistan announced the nation's commitment to reintroduce the cheetah](#) (*Acinonyx jubatus*) – a programme that will be led by WWF and IUCN Cat Specialist Group. There seems to be a lack of coordination between ministries, with the Ministry of Energy not consulting the Ministry of Ecology when selecting sites for wind projects.
8. **Insufficient studies and significant impact on birds:** The impact of the Project (wind turbines and 800 km long overhead transmission line) on bird species is not properly studied and despite this, net biodiversity loss is still predicted:

‘Such minor residual negative impacts could be on natural habitat (no net loss not achieved) as well as other possible residual negative impacts on Steppe Eagle (net loss due to mortality and possible loss of one breeding pair), residual negative impacts on Golden Eagle, Greater Spotted Eagle, White-tailed Eagle, Pallas’s Fish Eagle and Egyptian and Cinereous Vulture (mortality over PBR thresholds) and disturbance impacts to Honey Badger and Caracal (construction and operation).’

The area where the transmission line is planned is reported to be very important for the Asian houbara bustard (*Chlamydotis macqueenii*, VU) and White-headed duck (*Oxyura leucocephala*, Endangered (EN)) and potentially for great bustard (*Otis tarda*, EN) if the population in West Kazakhstan recovers. Many other species might be affected by the transmission lines. The draft ESIA studies were not sufficient for the size of the project (950 square kilometres): insufficient number of experienced ornithologists were employed and they visited the Project and transmission line area for too short periods of time. During the nest survey, many nests were likely missed due to this.

Moreover, most of the birds in the area nest on the ground and change location every year to avoid predation. This means that nesting areas for birds such as the steppe eagle and Asian houbara bustard should be mapped based on available habitats over multiple years and over a broader area around the turbines and the transmission line – something that was better done for the Bash and Dzhankeldy transmission line. The buffers around the nests proposed in the draft ESIA are insufficient, as these were found in just a few days of surveying by a small number of experts in only one breeding season. The bird surveys are not in line with Good International Practice – for example it is not clear according to what scientific methodology 17 vantage points and driving between them at up to 50 km/h would be sufficient to assess the impacts of 800 km of power lines.

Moreover, the ESIA does not take into account the available satellite tagging data on migration of raptor species, sociable lapwing, etc. (the only exception is houbara). This is probably the best data on bird migration in the region and is available online, in scientific articles, or on request from experts in Kazakhstan, Russia, etc.

9. **Inappropriate mitigation measures and even dangerous offsetting measures:** The ESIA proposes captive breeding and releasing of houbara bustards. As in the case of Dzhankeldy and Bash, this is not an offsetting practice in line with the World Bank Group standards. Moreover, releasing of captive-bred bustards brings other additional problems:

- There is a risk of genetic pollution of wild populations
- Captively-bred birds have different/unknown migration strategies or lack such strategies
- The ESIA has no information about the bustards released so far in Ustyurt (but propose the same measure)
- Captively-bred birds have very low survival rates
- They attract predators which can impact the wild populations

At the same time, the ESIA **does not prescribe any shutdown-on-demand system for the turbines**, nor burying the transmission lines in the most problematic areas – the only measures that could significantly mitigate the impacts. It is well known that bird diverters cannot mitigate collision of bustards with transmission lines. The lack of shutdown on demand system (IdentiFlight or other) brings up two problems: there is no way to stop the turbines if threatened birds approach them and it is impossible to collect sufficient monitoring data about bird use and bird mortality onsite in this remote area.

The potential wider conservation benefits (funding ecological surveys, national census surveys, border fence removal, providing additional equipment to the national park, education campaigns, supporting monitoring and conservation in Batumi, Georgia, retrofitting of anti-electrocution measures) discussed on page 249 of the draft ESIA cannot be proposed as compensation/mitigation measures, as is clearly shown by the [IUCN Policy on Biodiversity Offsets \(2016\)](#):

‘At a minimum, offsets must not be used:

(...) • Where the success of the offset action is highly uncertain due to a lack of knowledge;

- *Where there is a substantial risk that investment generated by offsets might substitute for, rather than add to, other investment for conservation (e.g. ‘cost shifting’);*
- *Where the values that will be lost are specific to a particular place, and therefore cannot be found elsewhere and adequately protected or re-created;*
- *Where the time lag between the residual loss of biodiversity caused by the project and the gains from the offset causes damage that cannot be remediated and/or puts biodiversity components at unacceptable risk;*
- *When impacts will occur in internationally and nationally recognized ‘no-go’ areas such as impacts on natural or mixed World Heritage Sites and protected areas that are recognized as IUCN categories I, II, III, and IV, inter alia;*
- *When such action is considered incompatible with IUCN policy and Resolutions.’*

Moreover, the project promoter cannot compensate for the government not fulfilling its obligations (for example – lack of vehicles for park rangers) and even more – the measures proposed are not measurable and not agreed upon (*‘These measures are being considered’*).

10. **No assessment of Indigenous Peoples:** it is unclear how the authors of the ESIA decided that the local Karakalpak people are not an indigenous people (point 6.2.2. of the ESIA) without an indigenous peoples assessment. They have their own language, are attached to the autonomous region of Karakalpakstan and have their own identity. They are also a minority group under threat since the onset of the Aral Sea ecological catastrophe.
11. **Need for further consultation:** The most important conservation groups and international organisations working on nature conservation on the Ustyurt Plateau were not consulted during the ESIA process although some were mentioned (page 86). The feasibility of the Project should be consulted with the UNDP, GIZ, Saiga Alliance, UNESCO, Sukkow Foundation, WWF, IUCN SSC Bustard Specialist Group and the IUCN Cat Specialists Group for potential issues and concerns, and WWF and the IUCN Cat Specialist Group in particular regarding the reintroduction of cheetahs.