



KAWERAK. INC.

REPRESENTING

Brevig Mission

Sitaisaq

Council

Diomede

Inyaliq

Elim

Niviarcaurluq

Gambell

Sivuqaq

Golovin

Chinik

King Island

Ugiuvak

Koyuk

Kuuyuk

Mary's Igloo

Qawiaraq

Nome Eskimo

Sitnasuak Inuit

Savoonga

Sivungaq

Shaktoolik

Saktuliq

Shishmaref

Qikiqtaq

Solomon

Anuutaq

St. Michael

Taciq

Stebbins

Tapraq

Teller

Tala

Unalakleet

Uᅇalaqtiq

Wales

Kinigin

White Mountain

Iᅇaluik /

Nutchirviq

August 28, 2018

National Science Foundation
Interagency Arctic Research Policy Committee
Sent via email to iarpcprinciples@nsf.gov

Subject: Comments on Draft *Principles for the Conduct of Research in the Arctic*

Dear NSF,

Thank you for the opportunity to comment on the Draft *Principles for the Conduct of Research in the Arctic* (June 28, 2018 version).

Kawerak is the regional non-profit tribal consortium in the Bering Strait region. Our organization recently celebrated 40 years of advancing the economic, social, political and cultural conditions in our region. Kawerak conducts, participates in, and monitors research activities, as do our 20 member Tribes.

Kawerak submitted detailed comments to IARPC in January 2018 about the previous (original) version of the Principles. As we noted in that letter, we support research that is well-designed, properly conducted, and which benefits our people, but we also have serious concerns about the way that some research is currently conducted, particularly in western Alaska. Several situations that have occurred in 2018 have reinforced those concerns. With those experiences in mind, we appreciate the opportunity to give additional feedback on these revised Principles and their use.

Please find, below, our comments and recommendations regarding the June 28, 2018 draft of the *Principles* and their use:

We did not see any discussion about how the Principles will be distributed or how researchers will be made aware of them, or how they will be implemented. As such, we include some of our original comments here:

Awareness of the Principles: *Over our many years of being involved in research, Kawerak has found that there are researchers in the Arctic who are unfamiliar with the specifics of the Principles or are not aware that they exist. We have also encountered other researchers who felt as though the Principles did not apply to them because their research did not directly involve 'human subjects' and/or was being conducted remotely. We hope that any revised Principles will be highly publicized to build awareness.*

Implementation of the Principles: *Kawerak recommends that the Principles be included in all federal research awards (grants, contracts, or cooperative agreements, depending on the agency) that relate to the Arctic. Additionally, we recommend that you develop an online training course for the Principles and that all Principal Investigators (PIs) be required to take the training if they receive federal awards related to the Arctic. We also recommend that an evaluation system be*

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Advancing the capacity of our people and tribes for the benefit of the region.

developed to determine if and how the Principles are being applied by PIs. This could include self-assessment by the PIs and should also include evaluation by the communities that the PIs are interacting with or that their research affects. Communities have repeatedly asked that the Principles and other best practices be enforced by funding agencies. In addition to the steps suggested here, we recommend developing repercussions for researchers that do not follow the Principles to further emphasize the importance of following them.

We believe that the above comments are crucial to ensuring that researchers are held accountable. Principle 1, in the revised document, is “**Be Accountable**”. This Principle is important and we are pleased that it is included. We are concerned, however, that it could be interpreted to emphasize “being accountable” as a way to facilitate future research activities. Accountability, at its core, is not about ensuring that future research projects go smoothly or encounter little resistance from communities. Accountability is about trust and respect. That *may* lead to future projects being facilitated by the previous experiences of communities with researchers, but that should not be the main reason that this principle is followed. The language used in this draft Principle could be read, for example, as ‘pay people for working with you and it will be easier to work with them in the future’. We don’t think this is necessarily what IARPC is trying to communicate here; we encourage you to revisit the language used. It is a positive thing to encourage researchers to be accountable, but the Principles/document are missing a discussion about how exactly researchers are to be held accountable. There must be some way to evaluate the effectiveness of these Principles. We encourage the National Science Foundation and other federal agencies to use the authority they have to ensure that their funded researchers follow these Principles in letter and spirit. Please see our comments regarding this above.

Principle 2: “Establish Effective Two-way Communication”

- In the United States, Tribes are not stakeholders like other groups that may be interested in research but, rather, have special status. The language in this document should reflect that (for example, ‘Researchers, Tribes and stakeholders...’).
- This tone of this Principle makes it seem as though communities are always being ‘impacted’ by research, and are not active participants, or otherwise involved in research activities. As written, it seems to reinforce the power imbalances that often already exist around research and communities. We suggest that language be added that encourages researchers to co-productively, or at least collaboratively, carry out activities with Tribes and communities and which recognizes that Tribes and communities often conduct their own research.

Principle 3: “Respect Local Culture and Knowledge”

- In point 3.4: “locally-adopted research guidelines” should be a separate sub-point: “Adhere to locally-adopted research guidelines or protocols.”
- Similar to language in the second principle, language in the third also sets the tone of research being imposed onto communities, rather than encouraging researchers to work directly with communities, including in the development of research goals. The Principles should be fostering this kind of thought and behavior by specifically talking about it.
- Community leaders and representatives should not only be consulted to resolve conflicts – if they are consulted from the very beginning, the likelihood of conflicts will be greatly reduced. We understand that this is partially addressed in the fourth Principle, but this should be made clear throughout the document.

Principle 4: “Build and Sustain Relationships”

- We believe the language in this Principle could be stronger.

- We encourage addressing the issue of ‘capacity’ more clearly by encouraging researchers to examine issues of capacity, as identified by Tribes or communities, to determine if their research activities can include funds, programs, or otherwise assist in addressing capacity issues. Capacity to participate in, review, monitor and otherwise be a part of research processes is often limited. If Tribes and communities are consulted early, these kinds of concerns can be taken into consideration during grant writing, which can result in support for Tribal or community participation in all components of research activities.
- We suggest that when researchers and Tribes or communities collaborate on research, that all agreements and plans are written down so that all parties have the same access to information and understandings of how collaborations (or other arrangements will proceed).

Principle 5: “Pursue Responsible Environmental Stewardship”.

- Researchers should not just ‘seek’ to avoid disturbing cultural resources, they should *not* disturb cultural resources. Some cultural resources are also protected under federal law and disturbance of such resources could result in legal action against researchers.
- Disturbance to wildlife that maybe be the subject of research should also be as minimal as possible.

Additionally, there are other comments that we previously made, which we still believe to be important and which should be included in revised Principles.

- **It is particularly important that research involving ‘human subjects’ is conducted properly.** While we understand that these Principles are meant to apply to all disciplines, and that researchers engaged in ‘human subjects’ research must also abide by 45 CFR part 46, we think that there is still room for some specific guidance regarding research that involves humans in these Principles. We recommend including language that discusses both permission and consent. Permission to conduct research must be obtained, and the informed consent of individual participants must be obtained for their participation or data gathering regarding them. These concepts may apply specifically to ‘human subjects’ research, but also apply to other types (or interdisciplinary) of research.
- **While the Principles discuss sharing research results with communities prior to ‘broader release’,** it should be made clear that full research results should always be provided to communities. This includes both technical products and data products, as well as results presented in a format that is understandable to a lay person. PIs should consult with communities to determine the best and most useful format for the presentation of research results. Research results should be presented in-person whenever possible and PIs are encouraged to plan for this in project design.
- **Unfortunately, we believe that researchers need guidance on the issue of recognition in publications or other documents.** We suggest including, under Principle 1: “Subject to the requirements for anonymity or confidentiality, as outlined in any informed consent processes, publications should always prominently refer to the informed consent of participants and give credit to those contributing to the research project.” These types of acknowledgements are not just related to social science, but may be appropriate following research in any discipline.
- **We still recommend developing a separate principle specifically to address Traditional Knowledge (TK) and Indigenous Knowledge (IK).** TK and IK should be part of every relevant project. The validity of TK has been codified in various federal laws and regulations

and should be specifically referred to in the Principles. Kawerak has definitions of these two distinct concepts on our Social Science Program webpage.

In addition to the above, we would also like to make it clear that Kawerak and Kawerak region tribes do not accept venues such as the Arctic Waterways Safety Committee, for example, as a place where formal approvals can be given for research. We encourage researchers to include presentations a variety of meetings and venues in their plans for *outreach*. Researchers and agencies should, however, be directly approaching and consulting with Tribes and communities for permission and consent to carry out research activities. Funders and agencies should support researchers traveling to communities to develop research projects and plans and to attend various meetings for additional outreach.

One other note we would like to make regarding our comments in this letter: Kawerak does not currently have the capacity to engage with each of our member Tribes and their communities about your revision of the Principles. These comments are based on our organizational experiences, the experience of our staff, as well as research-related experiences that our Tribes have communicated to us or which we have worked with them on. These comments are also based on a NSF-sponsored workshop hosted by our Social Science Program, which discussed research-related issues in detail (this report is available on our website and was previously provided to you). Directed outreach to communities that are affected by, which participate in, which conduct, or who are concerned about research is needed for IARPC to obtain a fuller understanding of the impact of these revised Principles. As far as we can tell, this has not happened, so we encourage you to evaluate the comments you receive in terms of the way your outreach was structured.

On your August 1 webinar you mentioned that IARPC has completed a literature review related to the Principles and similar documents. We are interested in the results of that literature review and request that it be shared with us at your earliest convenience.

Thank you for your work on these revised Principles. We appreciate the growing understanding of both IARPC and the broader research community regarding the need to engage with Arctic communities and residents on these issues. Thank you for your consideration of our comments. Please contact Rose Fosdick, Vice President of Natural Resources (907-443-4377, rfosdick@kawerak.org), or Julie Raymond-Yakoubian, Social Science Program Director (907-443-4273, julieri@kawerak.org), if you have any questions.

Sincerely,
KAWERAK, INC.



Melanie Bahnke
President