



August 2, 2020

Chris Oliver, Assistant Administrator for NOAA Fisheries
David Kennedy, Deputy Under Secretary for Operations at NOAA
National Oceanic and Atmospheric Administration
1401 Constitution Avenue NW, Room 5128
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North Pacific Research Board
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John Farrell, Executive Director
Fran Ulmer, Chair
US Arctic Research Commission
4350 N. Fairfax Drive, Suite 510
Arlington, VA 22203

Re: The need for co-productive approaches to research planning in the Bering Sea

Waqaa, Aang – Greetings. As Tribes and Tribal Organizations that represent and collaborate with many communities in Western Alaska and the Bering Sea, we write to share our collective concerns with the current processes that are utilized to determine research priorities for the Bering Sea region.

Kawerak Incorporated (Kawerak) is the Alaska Native non-profit Tribal consortium for the 20 federally recognized Tribes of the Bering Strait region. The Association of Village Council Presidents (AVCP) is the regional non-profit Tribal consortium for 56 Alaska Native villages in the Yukon-Kuskokwim Delta. The Bering Sea Elders Group (BSEG) is an association of Elder Representatives appointed by 38 Tribes in the Yukon-Kuskokwim and Bering Strait regions. The Aleut Community of St. Paul Island is the federally designated name used to identify the community of Unangan, or Aleuts, residing on St. Paul Island. The Alaska Native Tribal Health Consortium (ANTHC) is America's largest and most comprehensive Native-owned health services

organization, serving over 184,000 Alaska Native people statewide and representing 229 federally-recognized Tribes.

As Indigenous Peoples we have thrived in the Bering Sea region for millennia. As stewards of the lands and waters, we have established deep connections with the region that have resulted in extensive bodies of knowledge about the Bering Sea ecosystem that have been passed down from generation to generation. Importantly, our worldviews include humans as an integral part of this highly interconnected ecosystem (including marine, freshwater, terrestrial, atmospheric, and ice-related systems). Our knowledges are continually updated, adapted, and reshaped as our individual and collective experiences and observations inform them. Furthermore, our view of the ‘ecosystem’ is holistic and recognizes different systems, and the connections between them, such as physical, biological, chemical, social, and cultural systems.

Harvesting healthy wild foods from our ancestral territories is an important component of food security for our communities. The interconnected social and cultural aspects of food security, including the right to apply Indigenous knowledge systems, play a central role in our decision-making about marine policy in our region. Bering Sea region Tribes have a unique legal relationship with the U.S. federal government, including federal agencies with policy and management authority in the Bering Sea. This federal trust responsibility is the legal source for modern government-to-government Tribal Consultation.¹

The Bering Sea is one of the world’s most biologically important ecosystems, and hosts some of the world’s most economically important fisheries. There is little doubt that the Bering Sea ecosystem as a whole has been experiencing some of the most dramatic and unpredictable impacts from climate change, resulting in warming ocean and air temperatures, loss of sea ice, phenology shifts, changes in abundances and distributions of species, coastal erosion, flooding, and myriad other impacts. These impacts contribute to increased human health risks. Our communities have been sharing our concerns and knowledge about these numerous changes—which are as diverse as the communities in the Arctic—for many years now.

The Bering Sea is a distinct and dynamic region containing some of the world’s largest and most profitable fisheries, producing approximately 40% of U.S. seafood landings (and over half of Alaska’s commercial fisheries activity) and gifting over 25 million pounds of subsistence foods for Alaskans. Bering Sea fisheries provide over 10,000 full-time equivalent jobs, generating economic value extending beyond Alaska to other states. However, in the last two years NMFS bottom trawl surveys observed a massive northward shift of some key fish and invertebrate species, and a contraction of others. The permanence of this northward shift is currently unknown, but has already had serious implications for food webs and overall carrying capacity in the Bering Sea. Changes in the abundance, distribution, and energy content of fish and invertebrates affects the growth and survival of higher trophic level species and apex predators like seabirds and marine mammals.

For many decades we have asked to be active partners with agencies and academics that wish to come onto our lands and waters to conduct research; including research that informs national

¹ See Colette Routel & Jeffrey K. Holth, *Toward Genuine Tribal Consultation in the 21st Century*, 46 U. MICHIGAN J. OF L. REFORM 417, 430-35 (2013).

security, ecosystem health, economic development, and societal well-being, and which promotes resilient and sustainable Arctic communities. Our people have made immense contributions of time, energy, and knowledge to research endeavors. Unfortunately, however, those contributions have frequently not been met with reciprocal contributions by the research community to our communities. There continues to be a disconnect between resource managers, policy-makers, academics, agencies, and our communities. There are many types of research questions important to our food security, human health and well-being, infrastructure, security, cultural heritage, and overall resilience in an Arctic that requires increasingly nimble adaptation of our communities. We continue to lack meaningful access to and voice in the current research ‘landscape’ and research processes. Equity is needed to ensure that research questions and issues are addressed in relevant and respectful ways with direct involvement from Indigenous organizations, communities, and people.

We understand that starting in early 2020, as the COVID-19 pandemic began to sweep through our nation, federal agencies and others we engaged in or began ‘outreach and engagement’ efforts as part of the development of various research planning and priority, and ‘the state of’-type documents for the Bering Sea region. We have concerns about the following efforts, both in process and approach: the Interagency Arctic Research Policy Committee’s Bering Sea Action Team and Five Year Plan, the Alaska Ocean Observing System’s five-year planning, interagency workshops held at Alaska Marine Science Symposium and Alaska Forum on the Environment, BeringScience publication from Alaska Ocean Observing System, and the North Pacific Research Board’s research priorities, among others. We cannot overstate the need for true, equitable collaboration among Indigenous Peoples, Tribes, communities, state and federal government agencies, academia, and non-governmental organizations. As the first and enduring stewards of our ecosystem, including our traditional lands, waters, and ice and ‘resources’ (i.e., plants and animals), we have grave concerns that your research and planning efforts continue to happen with little to no consultation or collaboration with Bering Sea Tribes, communities, and knowledge holders.

Recommendations: Adopt a Co-Production of Knowledge Approach

Given the rapid pace of environmental changes, the importance of ensuring equitable inclusion of both Indigenous Peoples’ knowledge systems and science in addressing research questions *cannot be overstated*. Some of our organizations have taken a meaningful look at what a Co-Production of Knowledge (CPK) approach means to western and colonial scientific research. Kawerak has been instrumental in advancing a CPK approach in both research and policy realms,² and other Indigenous organizations have supported and adopted Kawerak’s approach to CPK (e.g. see the attached resolution passed by the Bering Sea Elders Group in 2019 that recommends a CPK approach). Furthermore, it is apparent to our organizations that the broader research community does not truly understand what a CPK approach is or has perpetuated a misinterpretation of what true CPK is.

² See Raychelle Daniel, Carolina Behe, & Julie Raymond-Yakoubian, *Understanding the Arctic Through a Co-Production of Knowledge*, Arctic Futures 2050 (2019), available at <https://www.searcharcticscience.org/arctic-2050/conference-2019/posters>; Raychelle Daniel, Julie Raymond-Yakoubian, Matt Drukenmiller, & Lauren Divine, *Voices from the Front Lines of a Changing Bering Sea*, American Geophysical Union Annual Meeting (2019), available at <https://agu.confex.com/agu/fm19/meetingapp.cgi/Session/83654>.

There has been a marked increase in the use of terms like collaboration, co-production, participatory, partnering, and others, by the research community at-large. However, we have collectively seen, at best, hollow words with few actions. Below, we detail some of the components of CPK as they relate to research and research planning in the Bering Sea region that we would like to discuss further with relevant organizations and agencies:

- First and foremost, CPK, as supported by the Indigenous organizations submitting this letter, includes the direct participation of Indigenous Peoples and knowledge holders. We recommend that meaningful engagement with these groups, as defined by these groups, occurs *prior* to and throughout the development of any Bering Sea research planning, including research question and priority development. Deliberate and intentional inclusion of Indigenous-led organizations prioritizes their equitable participation as decision-makers at every point in the process.
- We have experienced a significant lack of equity in virtually all practices and processes related to Bering Sea research to date. Current approaches have been driven largely by western science paradigms and with leadership that has prioritized western perspectives and values. Equitable representation of Indigenous perspectives and knowledge systems is needed during all steps of the research process.
- We recommend co-production of knowledge training for researchers living outside of the Bering Sea region, for example, early career researchers, and those new to Arctic research in addition to more experienced researchers that is led and facilitated by Arctic Indigenous organization representatives. This training will ideally include a history of Arctic Peoples, including the history of colonialism and research in the Arctic, decolonization training, and cross-cultural communication, cultural awareness, and sensitivity training components.
- It is critical to continue discussions about how to support and increase the means and ability of Indigenous communities and knowledge holders to participate in research-related activities. Additional resources are needed for community members and expert knowledge holders to effectively engage in and co-lead these activities. This includes providing equitable funding, training, and educational resources, working together with mutual respect and trust, and an awareness of and sensitivity to Indigenous worldviews, knowledge systems, processes, and values. For example, we have long advocated for financial compensation for all Indigenous research participants, and compensation for Indigenous community-identified experts and knowledge holders that is equivalent to that of Principal Investigators and Ph.D.-level researchers.
- Indigenous-led regional organizations should be leading or co-leading processes to identify research priorities. These organizations have strong existing relationships and knowledge about their constituencies. Furthermore, designing research questions and projects around issues identified at community and regional levels (e.g., Indigenous food security issues and their connections to ecosystem change) requires the kind of expertise and knowledge that many academic scientists do not have; determining appropriate methodologies and implementation strategies are best done through a co-production framework.

- There is a significant need to expand the capacity for regional non-profit and non-governmental organizations to effectively work with communities on research issues. For example, by collectively funding positions within regional organizations that are focused on research coordination. This also includes the rigorous inclusion of Indigenous People and organizations in seats of power related to research decision-making.
- Additionally, there needs to be a recognition within the research community of Tribal sovereignty and how that relates to decision making in the context of research. Communities have asked for and must be provided with the opportunity to say ‘yes’, ‘no’, or ‘maybe, but with conditions’ to any research activities (including planning activities) that will or have the potential to impact their communities and ways of life. When we are equitably involved from the beginning in these processes, and treated with trust and respect, decisions are much easier to achieve via consensus.

Our organizations and communities are extremely concerned about environmental, economic, social, and other changes happening in the Bering Sea region, as well as the research that is being funded on these topics. Our desire, and our request to you, is to work directly with us in collaborative approaches to develop meaningful research priorities and plans for the Bering Sea region. We look forward to your response and to working with you to collectively grow our knowledge and understanding of the Bering Sea, and to achieve these goals in a mutually respectful and equitable way. To reach us, we ask that you please contact our designated point person, Dr. Julie Raymond-Yakoubian, Kawerak Social Science Program Director, at (907) 443-4273 or juliery@kawerak.org.

Sincerely,



Melanie Bahnke
President
Kawerak, Inc.



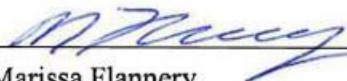
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