



KAWERAK , INC.



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SERVING THE
VILLAGES OF:

BREVIG MISSION

COUNCIL

DIOMEDE

ELIM

GAMBELL

GOLOVIN

KING ISLAND

KOYUK

MARY'S IGLOO

NOME

SAVOONGA

SHAKTOOLIK

SHISHMAREF

SOLOMON

STEBBINS

ST. MICHAEL

TELLER

UNALAKLEET

WALES

WHITE MOUNTAIN

January 15, 2018

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

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

Dear NSF,

Thank you for the opportunity to comment on the *Principles for the Conduct of Research in the Arctic*, which are currently under review.

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.

While we support research that is well-designed, properly conducted, and which benefits our people, we also have serious concerns about the way that some research is currently conducted, particularly in western Alaska, and appreciate the chance to share those concerns as they relate to the *Principles*. We would also like to direct you to a recent report by our Social Science Program and Sandhill.Culture.Craft that discusses some of these issues in more detail: *Research Processes and Indigenous Communities in Western Alaska* (<http://www.kawerak.org/forms/nr/Research%20Processes%20and%20Indigenous%20Communities%20in%20Western%20Alaska%20Workshop%20Report.pdf>). This report is part of a larger collaborative project with Tribes in our region.

Please find, below, our comments and recommendations regarding the *Principles* and their use:

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. We also recommend that you maintain an Introduction to the

Principles where you discuss their applicability across disciplines, research topics, methods and field sites. This Introduction should discuss the fact that researchers and communities may have very different concepts of “impacts,” so it is always appropriate to communicate with communities at the earliest stage, rather than making assumptions about impacts.

- **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 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.
- **Principle 1:** We recommend that the language be revised to discuss 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. Principle 1 should also note the need for discussions about the long term storage of project data and related accessibility issues; including the continuance of any protective (e.g. confidentiality or non-disclosure) measures that were agreed upon for communities, individuals or pieces of information.
- **Principle 2:** Strike “local” from this principle. The language in this principle should be clarified to indicate that consent is not the goal, but part of the process, and individual participants and/or interested or affected communities should be kept informed about project activities throughout the life of the project and, preferably, be directly involved in the activities. Note that any changes to the project (new funders, new PIs, different methods, etc.) may require re-consenting participants, depending on the circumstances.
- **Principle 3:** This principle should note that all research is of potential interest to communities, that communities may perceive impacts from research that PIs do not, and that every opportunity should be provided for communities to learn about and participate in research from the planning stages and throughout the life of a project.
- **Principles 4/5:** Strike “local” from these principles. Full research results should 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.
- **Principle 6:** Suggested revision to the language: “Subject to the requirements for anonymity or confidentiality, as outlined in the informed consent process, publications should always prominently refer to the informed consent of participants and give credit to those contributing to the research project.”
- **Principle 7:** We suggest 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. For Kawerak definitions of these two distinct

concepts, please see our document on Knowledge and Subsistence-related Terms:
<http://www.kawerak.org/forms/nr/Kawerak%20Knowledge%20and%20Subsistence-Related%20Terms.pdf>

- **Principle 10:** We suggest revising this Principle. Confidentiality and anonymity are not always required or desired, depending on the circumstances. This includes information of a personal nature. These matters should be discussed with the communities and individuals during the planning, permission and consent processes.
- We recommend an additional Principle: One of the principles should be that if affected communities have their own principles, guidelines, or protocols, researchers should follow those.
- Kawerak would also like to emphasize that we believe our Tribes and communities should have the opportunity to co-produce research (this includes research priorities, research projects, research questions, research products, etc.) for all studies that affect them, affect resources or the environment they depend on, or that are of potential interest or use to them. This includes being involved in the earliest possible stages of research planning through to the creation and distribution of research products.
- At one of your outreach meetings it was noted that you may produce an appendix regarding communication with communities before, during and after research. We endorse regular communication throughout the research process but caution that each community will have different desires about who to communicate with, how and when. For the Bering Strait region, Tribes are always the most appropriate initial contact point. Kawerak can also be contacted for guidance about research in the region.
- Researchers, funders and others should keep in mind that even when research projects are desired and endorsed by communities, they also place burdens on communities and often on regional organizations that work with communities. Capacity to participate in, review, monitor and otherwise be a part of research processes is often limited. This should be kept in mind when developing research ideas and should be accounted for in research proposals and in developing research partnerships with Tribes or regional organizations.
- We believe that the Principles are a ‘baseline’ guide for working with northern communities. We caution against developing specific protocols for how to do ‘participatory’ research or for how to include Traditional Knowledge in the broad range of research activities that may be conducted; these types of protocols should be developed by Tribes and communities and it is often advisable to revisit them on a project-by-project basis to ensure that they are appropriate to the specific work being conducted.

Thank you for your consideration of our comments. We look forward to reviewing the revised Principles when they are available and providing additional comments at that time. Please contact me if you have any questions (907-443-4273 or julieri@kawerak.org).

Sincerely,
KAWERAK, INC.



Julie Raymond-Yakoubian
Social Science Program Director