



May 5, 2022

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Chair Mallory and Acting Director Nelson:

This letter is being submitted on behalf of Kawerak, Inc., the Association of Village Council Presidents, Tanana Chiefs Conference, the Aleut Community of St. Paul Island, the Kuskokwim River Inter-Tribal Fish Commission, and the Bering Sea Elders Group. The Tribes and Tribal Organizations submitting this letter represent nearly 110 federally-recognized Tribes and write in response to two items.

First, we would like to express appreciation for the Indigenous Traditional Ecological Knowledge and Federal Decision Making memorandum issued in November 2021 by the White House Council on Environmental Quality (CEQ) and the White House Office of Science and Technology Policy (OSTP). The memo recognizes Indigenous Traditional Ecological Knowledge (ITEK) as a form of knowledge to inform Federal Government decision making where appropriate and commits to improving Federal engagement with Tribal Nations and Native communities around ITEK. We are also collectively encouraged by the formation of the Interagency Working Group on Indigenous Traditional Ecological Knowledge.

Second, we are providing response herein to the Tribal Consultation and Public Input Opportunities on ITEK in Federal Policy announced in March 2022. Recently, we participated in Tribal Consultation and public input opportunities related to ITEK in Federal Policy. Below is expanded feedback for specific questions posed by OSTP and CEQ.

### **What would you like Federal employees to know about ITEK?**

Wherever western science is used, so should Traditional Knowledge (TK) be used. Wherever local, western, and other perspectives, concerns, and knowledge are used, so should Indigenous Knowledge (IK) be used.

It is important to note that in our view, Traditional Knowledge is only Indigenous. Thus, to say ITEK (or similar) is redundant.

- Federal employees should be engaging Traditional Knowledge (TK) and Indigenous Knowledge (IK) as wholes, not just TEK and IEK. TK and IK include more than ecological aspects, and to isolate ‘ecology’ is to miss the holistic nature of these bodies of knowledge.
- TK includes interconnected aspects of relationships with humans, spirituality, the environment, and animals, among other things. All of this information is relevant to federal scientists, policymakers, and managers, and from a variety of perspectives (as information, as values, etc.).

Furthermore, Federal employees should understand that to access and learn from knowledge holder’s TK/IK, they will need to establish trusting, reciprocal, and long-term relationships with that knowledge holder and their Tribal community. Trust and relationships are keys to this process, as much TK/IK is not written down and is primarily shared orally among family members, within Tribal communities, and with trusted non-Tribal citizens. TK/IK that is written down, included in graphics, or otherwise documented might be protected information for only Tribal members to access.

### **Thinking about the areas where you engage with the Federal government, how would you like to work with Federal departments and agencies in the future to ensure that ITEK properly informs Federal processes and policies? What challenges do you foresee?**

At a general level, there is still a long way to go towards the appropriate and equitable incorporation of Indigenous ways of knowing (e.g. as expressed in TK and IK) in Federal management, policy, and science. There must be a concerted effort within all aspects of the Federal government towards addressing this challenge.

Additionally, there are a number of myths and misconceptions about the applicability and nature of TK, and it is important to avoid them. Wherever western science is used, so should TK be used. It is part of the best information available, and it also has advantages over western science, e.g. being based on long-term, *in situ* observations. TK is sometimes inaccurately viewed as being narrow in its spatial or temporal scopes, e.g. that TK holders only know about their immediate environments, or that TK is only about the past. This is not the case. TK applies to small and large

scales, including globally, and at the factual and at ‘abstract’ (e.g. values) levels. It can also inform many topics which people may not realize, either directly or indirectly (e.g. as proxy data). TK is shared not only within communities, but also between communities, and TK holders also incorporate other sources of information, including from scientific literature and other communities. TK is adaptive and ever-evolving. Federal employees should not assume what TK can and can’t speak to, directly or indirectly, nor what TK holders are interested in or what they know about.

TK may be either ‘documented’ in written or published formats, or not, and both sources should be considered. To fully effectuate this, those working within the Federal government will have to do work to engage this knowledge. Engagement of such knowledge is part of various mandates, such as respecting Tribal sovereignty, and using the best information available, to obtain, engage, and incorporate this information and the people holding it. It is also important to have the capacity to do so; as such, Federal agencies should have qualified experts such as Traditional Knowledge holders and non-economic social scientists to engage and incorporate this knowledge into their work.

**What terminology should be used (e.g., Indigenous Knowledge, Traditional Ecological Knowledge) when referring to this body of work in the Federal context?**

We advocate for recognition and comprehension of the underlying concepts pertaining to TK and IK-related terminology, and respect for the terms (English or Indigenous) that exist in and are used by Indigenous communities. Various terms for these ideas are used by Indigenous people. Recognizing and using terms that Indigenous people themselves use is important, as well as understanding the underlying conceptual issues associated with these terms.

For example, to illustrate the terminology used by one of the organizations signing on to this letter, Kawerak uses particular terms which resonate with the communities in their region and which are useful in the work they do. Kawerak has developed a briefing document discussing these terms and the ideas embodied by them, which can be seen here: <https://kawerak.org/wp-content/uploads/2018/04/Kawerak-Knowledge-and-Subsistence-Related-Terms.pdf>.

Additionally, Kawerak has also developed a four-language glossary for Indigenous terms related to science, policy, knowledge, and management, which can be seen here: <https://kawerak.org/download/4-language-glossary-terms-for-research-science-and-policy/>.

Kawerak uses the term Indigenous Knowledge to refer more broadly to all forms of the knowledge of Indigenous people and uses the term Traditional Knowledge as a specific subset of that Indigenous Knowledge pertaining specifically to expert knowledge that is long-term, intergenerational, and which is adaptive but also rooted in deep history. Thus, this distinction highlights that there is knowledge developed over millennia within Indigenous communities, as well as knowledge within Indigenous communities which, while perhaps not connected to this deep wellspring of tradition, is valuable as an Indigenous perspective. Drawing this distinction, which in many cases is mainly heuristic, is important for a number of reasons, including methodologically, so one is clear about what one is talking about, who one is talking to, and that one is engaging these perspectives and bodies of knowledge with the appropriate terminological

and conceptual toolkit. Take, for example, the methodology for a scientific study: is the study looking to engage all Indigenous community perspectives as a whole, or differentiated into particular sub-sets, or only particular types of knowledge, or something else? Without a robust and inclusive conceptual and terminological toolkit, one may be unable to conduct appropriate work, analysis, and comparisons resulting from research engagements with Indigenous communities, for example. Kawerak advocates on behalf of all the knowledge and perspectives of Bering Strait region Tribes, and thus finds it important to be able to have clarity and the appropriate terminological and conceptual toolkit for the work they are doing, and they encourage federal employees to be similarly grounded; as such, we encourage the White House to understand the complex issues associated with these terms and concepts (e.g. what do these bodies of knowledge entail, who will have which kind of knowledge, are we taking steps to appropriately respect and incorporate this knowledge, are we making false assumptions about this knowledge or knowledge holders, etc.).

**Are there existing guidance documents, agreements, or practices that provide good examples of how ITEK should be elevated in Federal processes and policies?**

Yes, there is an enormous body of work on TK, guidelines, best practices, and critically and effectively engaging these and related concepts.

For example, we believe that research, science, management, and policy should be done co-productively with Indigenous peoples. Kawerak, ICC-Alaska, and the Pew Charitable Trusts have developed a framework which can be used for doing this; see here: <https://kawerak.org/download/article-a-framework-for-co-production-of-knowledge-in-the-context-of-arctic-research/>.

Additionally, the Kawerak Social Science Program and partners have done an enormous amount of work pertaining to Traditional Knowledge, Indigenous Knowledge, and Knowledge Sovereignty and Indigenization. This includes, among other things, development of an upcoming toolkit relating to research-Tribal interactions (including Tribally-based research-related protocols, guidelines, and best practices); documentation, analysis, and application of Bering Strait region TK on a variety of topics; and analysis and guidance related to the incorporation of TK and IK into policy, management, and science (e.g. regarding federal fishery management, ocean planning and policy, Tribal Consultation, etc.). Please see the Kawerak Social Science Program website (<https://kawerak.org/natural-resources/social-science/>) and the Kawerak Knowledge Sovereignty and Indigenization website (<https://kawerak.org/knowledge>) for more information.

**The fifth National Climate Assessment, currently underway, is a congressionally mandated report that assesses observed and projected impacts of climate change across the United States. How do you recommend ITEK be represented in the development processes and content of National Climate Assessments?**

As noted by another Tribal participant at one of the recent discussions with the White House on this topic, it is important for federal agencies to know the Tribes, and to take steps to tailor work regarding climate change to the specific needs and priorities of each Tribe. A consistently open table to engagement with Tribes is of paramount importance for achieving this reality.

The NCA5 should include representatives from Tribes and Indigenous organizations on all of the writing teams (not just the Tribal chapter) so that they can provide specific guidance on how TK is relevant to specific chapters.

It is important to recognize the myriad and interconnected ways in which climate change is playing a significant role in the lives of Tribes and their members, and the ways that Traditional Knowledge is connected to that. It is also important to recognize the importance of avoiding colonial perspectives on climate change, including only understanding Tribes in terms of how such changes ‘impact’ Tribes, or ways that Tribes can be ‘helped’ regarding responses to climate change. The assets that Tribal communities have, including Traditional Knowledge, should also be highlighted. The reality of environmental change comes into being in particular contexts through the interactions of Tribes, their environment, history, and other entities like the Federal government. Additionally, Indigenous peoples have a long-standing history of adaptation and resilience in the face of changes of many types. None of this is to say that climate change is not a reality that presents very great challenges and threats to Tribes; rather, it is to point out that Federal engagements with Tribes regarding climate change must tackle the problem through an approach which is informed, collaborative, and equitable.

Thank you for the opportunity to submit these comments. We look forward to continuing to work with the OSTP, CEQ, and the Interagency Working Group on improving how IK and TK informs federal decision-making.

Sincerely,



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President  
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