



**KAWERAK**

March 18, 2019

*REPRESENTING*

**Brevig Missior**

*Sitaisaq*

**Council**

**Diomede**

*Iñaliq*

**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**

*Añutaq*

**St. Michael**

*Taciq*

**Stebbins**

*Tapraq*

**Teller**

*Tala*

**Unalakleet**

*Uñalaqtiq*

**Wales**

*Kinigin*

**White Mountain**

*Iğaluik /*

*Nutchirviq*

VIA Email to:

Elizabeth Figus

Diana Evans

At North Pacific Fishery Management Council

Dear Elizabeth and Diana,

Thank you again very much for meeting with Kawerak Social Science staff and Consultant to talk about the Traditional Knowledge (TK) and Local Knowledge (LK), and Subsistence Action Module. We are appreciative of Council staff's efforts to include indigenous organizations and concerns into the groundwork for this Module. We provide here for you some recommendations about the workplan which Council staff are developing for the Module. These are not all of our thoughts about the Module, but some ideas which will hopefully be of use to you at the stage of the workplan you are drafting right now. If there are other areas we can comment on now, please do not hesitate to contact us and we will provide more comments.

Kawerak believes this Action Module should be thought of in terms of having three parts: 1) Developing a process for the incorporation of TK in Council processes, 2) Developing a process for the incorporation of LK in Council processes, and 3) Developing a process for incorporating subsistence data in Council processes and understanding the impacts of Council processes on subsistence.

We feel that parts 1 and 3 above are the most pressing gaps in Council processes, particularly as pertains to this Module. There is a much longer history of the more robust and regular incorporation of LK and LK stakeholders into Council processes, sometimes formally and sometimes informally. We feel that because of this, and because of the three-part nature of the Module, that at least two-thirds of the Module team should be experts related to Parts 1 and 3.

Additionally, with regard to the composition of the module team, we feel that there should be an openness and inclusion of a variety of types of experts – especially TK holders and expert subsistence practitioners, people in Alaska Native Organizations and Tribes who have experience working with fisheries TK, social scientists with TK expertise, experts working with subsistence data, among others areas and categories (including agencies and academics as well). We recommend that the Council look outside its normal areas of inclusion (i.e. agencies and academia), because much of the expertise on

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these topics is located elsewhere, and this will be an important process step in making the goals of the Module a reality. Additionally, we recommend avoiding overlap in appointments with existing bodies (e.g. the SSPT, SSC, and Bering Sea FEP team). This is a great opportunity to expand the circle of expertise available to the Council, and choosing 'from within' will narrow that benefit.

To expand the expertise, one idea would be to have the Module team encourage expert invitees to attend or present to the Module team when appropriate – which allows those linkages to be maintained without creating redundancy. Expertise could be invited to present to various groups within the Council, for example the Ecosystem Committee, with the purpose of informing what tribal people mean when they talk about “the subsistence way of life” or talk about “the importance of traditional knowledge”. There are many areas of mutual interest within the Council discussions such as the topic of our changing environment and I hope the Council would want to hear how people adapt to environmental changes and access to resources.

With regard to the LK seats, we recommend that the Council keep in mind that there are a variety of LK holders, and important among these are indigenous voices. This includes, for example, commercial fishers and CDQ representatives. Indigenous participants and knowledge-holders shouldn't be excluded from this segment of the group.

We would recommend that the module team itself be kept to 15 people maximum to prevent it becoming unwieldy in size. It may be useful for the Council to leave some seats open when constituting the Team to allow the Team itself to select some of the remaining members, after they evaluate their tasks and associated needs.

With regard to specific names for the Team, we can recommend people at a later date. We encourage the Council to have a broad conceptualization of what affiliations are acceptable for any nomination process, and it should include ANOs, Tribes, and Tribal organizations. We recommend that there be a strong effort made towards ensuring that membership has expertise in all the key areas (e.g. social science of TK, social science of subsistence, TK-holder expertise, subsistence practitioner expertise, etc.), and to the extent possible representation of expertise pertaining to, or residence in, all the different Bering Sea regions (while realizing the latter might not be possible).

We recommend that efforts be made to maximize possibilities for access, and examine the possibility of diversity in meeting site choices, where funding allows. Additionally, we recommend the Council look into funding possibilities for participants, as funding to participate could be a prohibitive barrier for some nominees.

Thank you again for engaging with Kawerak regarding this issue, and please let us know if there are any other areas related to the current workplan draft

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that we can provide further comment on. Additionally, we are very interested in any Council-related meetings which may be coming up related to the Module, such as the FEP Team's possible meeting in the near future, and would ask you to keep us apprised of when such events get scheduled.

You may contact myself at 907-443-4377, [rfosdick@kawerak.org](mailto:rfosdick@kawerak.org), Julie Raymond-Yakoubian (Kawerak Social Science Program director: 907-443-4273, [juliery@kawerak.org](mailto:juliery@kawerak.org)), or Brenden Raymond-Yakoubian (Sandhill.Culture.Craft, consultant to Kawerak: 907-434-1413), [brenden@SandhillCultureCraft.com](mailto:brenden@SandhillCultureCraft.com) in terms of followup on these issues.

Sincerely,  
KAWERAK, INC.



Rose Fosdick  
Vice-President, Natural Resources

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