

# PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C4 ~~BS FEP~~ BS FEP

*Check the boxes below if you will have a PowerPoint or Handout*

	NAME <i>(Please Print)</i>	TESTIFYING ON BEHALF OF:	Handout	PPT
1	Lauren Divine	The Aleut Community of St. Paul Island		
2	Melissa Heflin	Boering Sea Elders group	X	
3	Brecca Robbins Gasclair	Ocean Conservancy		
4	Rose Fosdick	Kawerak, Inc.		
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.



## Bering Sea Elders Group

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November 30, 2018

Simon Kinneen, Chairman  
North Pacific Fishery Management Council  
Norton Sound Economic Development Council  
P.O. Box 358  
Nome, AK 99762

Dear Mr. Kinneen and Council Members,

Bering Sea Elders Group (BSEG) is very appreciative of the efforts thus far of the Fisheries Ecosystem Plan (FEP) Team and Council staff working on the document. We appreciate the effort in continuing to foster partnerships, including incorporating many of our recommendations. We likewise appreciate the inclusion of our tribal concerns and information and are happy to see that the document has continued to evolve.

We have a few recommendations to the Council at the December 2018 meeting. First, we recommend that the Council adopt the Bering Sea FEP document. We appreciate the incorporation and modifications into the document of Traditional Knowledge (TK), subsistence, and tribal indigenous concerns, including involvement with the federal fishery management process and the value of Tribal Consultation within the FEP document. Moving forward, we look to continued two-way communication between the Council, FEP Team, and the Action Module teams and our indigenous organizations and rural communities.

Second, we recommend that the Action Module team prioritize the TK and Subsistence Action Modules, including the robust use of TK to inform throughout the entirety of the document. We encourage inclusion of members from indigenous subsistence experts who live in, represent, and work with indigenous community members to be a part of the Action Module team. This kind of expertise does not come from a traditional, Western-trained scientist but derives from the life experience of hunting, fishing and living on the Bering Sea. They can share information not available in any book and their information is highly valuable, so we strongly recommend that the Council seek out and involve community experts.

Finally, we are very concerned about the Council's process for discussing membership of the Social Science Plan Team (SSPT). Meeting notes indicate that that the "independence" of tribal nominees was also discussed, with the implication that nominees with tribal affiliations could not be independent. To be blunt, this assertion is deeply offensive. Tribes are governments and are to be recognized as such by federal bodies such as the Council. Tribal representatives are able to be independent, just as representatives from state and federal governments are assumed to be.

Based on this conversation it appears the Council directed staff to create a separate process for selecting a tribal representative on the SSPT. BSEG wholeheartedly disagrees with this approach.

The Council's treatment of tribal applicants to the SSPT leads BSEG to request that the Council open a larger conversation about nominee affiliations for all Council committees, plan teams, and workgroups. We request that the Council identify and clarify what types of affiliations are required in order to be considered for appointment to Council committees, plan teams, and workgroups. We also request that the criteria that are used for decision making regarding appointments be clearly articulated so that it is evident to the public how decisions are being made. We ask that this process take place prior to any new and separate appointment processes being developed for the SSPT or other Council body. Finally, BSEG requests that these clarifications be accomplished through a proper notice and comment process.

Again, thank you for your efforts thus far.

Quyanaq,



Mellisa Heflin  
Executive Director  
Bering Sea Elders Group