Implementing Indigenous Food Sovereignty in the United States: Reforming the Food Distribution Program on Indian Reservations

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Author's Declaration

I, the undersigned, **Marielle Turkowski**, candidate for the **Master of Arts in Human Rights**, declare herewith that the present thesis is exclusively my own work, based on my research and only such external information as properly credited in notes and bibliography. I declare that no unidentified and illegitimate use was made of the work of others, and no part of the thesis infringes on any person's or institution's copyright. I also declare that no part of the thesis has been submitted in this form to any other institution of higher education for an academic degree.

Vienna, June 15, 2022

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I am also reminded of my mom with her garden and my dad with his compost pit, who both first piqued my curiosity that food is more than just something we eat.

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Abstract

Industrialized food systems in the United States are failing Native Americans. Indigenous people face food insecurity at twice the rate of other demographics, are more likely to live in "food deserts", where fresh, affordable groceries are hard to come by, and thus experience higher rates of malnutrition, nutrition-related illnesses, and premature death than other Americans. Government initiatives such as the Food Distribution Program on Indian Reservations have attempted to ameliorate this public health crisis by increasing food security through delivering grocery packages to rural Native American communities. Major critiques of this program cite a lack of local agency, claiming that without independent governance at the regional level, FDPIR is merely a "Band-Aid solution", not invested in long-term remedies for Indigenous public health or cultural restoration. In recent decades, grassroots activism for Native American food access, culturally appropriate diets, and public health has centered around a reclamation of Indigenous food sovereignty, wherein communities have the right and resources to decide their own food systems. Through five Indigenous criteria for food sovereignty, cultural relevancy, health improvement, non-exploitation, consumer choice, and sustainable economies, this thesis analyzes the Food Distribution Program to discover how it can be functionally reformed to better support Indigenous food sovereignty. The findings show that while FDPIR has begun to engage with all five goals, it fails to meet any due to the over-centralization of the program. Recommendations to reform FDPIR revolve around furthering food security by stratifying packages based on need, regionalizing by reinstating a modified version of the Vendor Pilot Program, incorporating more traditional foods, and increasing contracts with Native producers.

Keywords: Indigenous food sovereignty, food security, Federal Distribution Program on Indian Reservations.

Chapter 1: Introduction

Modern Health Disparities in 'Indian Country'

To understand the role of the Food Distribution Program on Indian Reservations and how it affects food sovereignty in Native American communities, one must first understand the gravity of diet-related health issues among Indigenous communities in the United States. Native Americans are facing a public health crisis that derives from a lack of food security. Food security determines several aspects of health, and lack of access to nutritious food catalyzes a myriad of disorders and diseases, including malnutrition, diabetes, cardiovascular disease, hypertension, and obesity, among others.[1] Roughly one in four Indigenous people in the United States experience food insecurity despite the statistic being one in eight for Americans as a whole, meaning that food insecurity is twice as high in Native American communities compared to others.[2] Areas where large numbers of the population are experiencing low food security are known as "food deserts". In food deserts, there are less traditional grocery stores and more convenience stores, and food that is affordable and fresh is hard to come by. Out of convenience and financial constraint, people resort to eating preserved foods that are high in calories but low in nutrition. As an example, Navajo Nation with a population of 330,000 people spanning 71,000 square kilometers of three states, only has 11 grocery stores – most of which are convenience stores, only selling snacks and processed foods.[3] Considering the national average grocery store

[1] Christian A. Gregory, Alisha Coleman-Jensen. "Food Insecurity, Chronic Disease, and Health Among Working-Age Adults", ERR-235, U.S. Department of Agriculture, Economic Research Service, July 2017.
[2] Pindus, Nancy, and Carol Hafford. "Food Security and Access to Healthy Foods in Indian Country: Learning from the Food Distribution Program on Indian Reservations." *Journal of Public Affairs* 19, no. 3 (2019). https://doi.org/10.1002/pa.1876.
[3] Belanus, Betty J. "Indigenous Food Sovereignty in the United States: Restoring Cultural Knowledge, Protecting Environments, and Regaining Health." *Western Folklore* 80, no. 1 (Winter, 2021): 118-121.

density is .17 stores/1000 people, Navajo Nation should have nearly 60 grocery stores.[4] This is a common trend across many low income and high minority regions of the United States, with Native American communities located in some of the most extreme nutrient vacuums in the country. The outcomes of this are bleak: one in three Navajo residents is diabetic or prediabetic, Navajo Diné are 50% more likely to develop obesity or cardiovascular disease than the average American, and 75% of Navajo households experience some degree of food insecurity.[5] Situations like that of Navajo Nation are common amongst Indigenous communities across the United States. Overall, Native Americans live roughly 4.4 years less than the average American, and many of these deaths are due to preventable illnesses that Native Americans suffer at a greater degree due to disparately lower food security.[6] In order to solve this crisis, food systems must be reformed for greater equity in nutritious and affordable food access.

How Industrial Food Systems Continue to Harm Native Americans

The industrialization of the American food system is one of the largest contributors to poor public health and food insecurity among Indigenous peoples in the United States. Certain aspects of the industrialized food industry, such as corporate grocery chains and factory farming, harm Native American communities the most. Firstly, food deserts are largely attributed to the

https://www.proquest.com/scholarly-journals/indigenous-food-sovereignty-united-states/docview/2465478078/se-2?accountid=14784.

[4] Food Environment Atlas Data Documentation." USDA, September 2017. https://www.ers.usda.gov/webdocs/DataFiles/80526/2017%20Food%20Environment%20Atlas%20Documentation.pdf?v=3230.9.

[5] "Navajo Youth Lead the Way to Healthier Lives in Arizona, Utah, and New Mexico." Centers for Disease Control and Prevention. CDC. Accessed November 24, 2021. https://nccd.cdc.gov/nccdsuccessstories/TemplateThree.aspx?s=13770&ds=1.

[6] Smith, Mary. "Native Americans: A Crisis in Health Equity." Americanbar.org. Accessed January 13, 2022. https://www.americanbar.org/groups/crsj/publications/human_rights_magazine_home/the-state-of-healthcare-in-the-united-states/native-american-crisis-in-health-equity/.

industrial food system in the United States, such as the monopolization of corporatized grocery stores, which have replaced local markets around the country. Single marketplaces are typically owned by locals of the area, who have more incentive to set up business in otherwise unprofitable areas, and are more likely to source from nearby vendors, circulating the local economy. Since grocery stores operate on a thin profit margin, they often opt not to build franchises in rural areas where population density is low and the cost of transporting goods is higher.[7] For this reason, grocery store chains frequently neglect reservations, yet have already created a hostile economic environment for local markets and producers, contributing to food insecurity in areas with low population density, which are often with a high concentration of Indigenous people.

Secondly, large industrial farming operations such as Concentrated Animal Feeding Operations (CAFOs) are more likely to be built in minority areas, including Native reservations, because of remoteness, lack of development, and political advantage to fight back.[8] These largescale industrialized livestock farms lead to increased pollution and contaminated waterways from animal waste in nearby communities and are also some of the lead contributors of climate change, which often affect Indigenous populations soonest and more severely.[9] Whether it be crop farms with pesticide residue or livestock farming with an excess of manure, large, industrialized farms produce tremendous waste that often leaches into the waterways of these

[7] "Native Americans Living in Tribal Areas Face Longer Trips to the Grocery Store." USDA ERS - Native Americans Living in Tribal Areas Face Longer Trips to the Grocery Store. Accessed January 15, 2022. https://www.ers.usda.gov/amber-waves/2015/april/native-americans-living-in-tribal-areas-face-longer-trips-to-the-grocery-store/

[8] Drake, Morgan. "Big Agriculture and Harm to Minority Communities: How Administrative Civil Rights Complaints Are the Solution." *BYU Law Review* 2019, no. 4 (August 21, 2020).

[9] "Climate Change for Indigenous Peoples." United Nations. Accessed June 12, 2022. https://www.un.org/development/desa/indigenouspeoples/climate-change.html.

nearby communities, causing higher rates of cancer and other health complications amongst those populations. Even with the widely known risks of "Big Agriculture" to vulnerable communities, the federal government subsidizes these large farms to state firms, violating Title VI of the Civil Rights Act, which prohibits federal entities to contribute to any program that is discriminatory.[10] Despite the moral and legal implications, government entities continue to provide funds to such operations, contributing to structural violence against Native Americans through industrialized food systems.[11] This example is to show not only how the monopolized food industry harms Native Americans, but to show the position of the U.S. government in enabling these harms. Ultimately, decentralizing and deindustrializing food systems is an important step in protecting Native American communities, and the federal government bears some responsibility to enact this change.

A Brief History of Food as a Tool for Colonization

These modern problems of disparately high food insecurity and negative impacts of industrialized foodways among Native American communities are linked to the history of food as a colonial instrument. While some changes to Indigenous food systems made by settlers were unintentional and others with purpose, all were extremely effective at divorcing Native peoples from their traditions and agency. For example, when settlers first arrived in the Americas, they found Indigenous communities had fewer domesticated animals and different crops than those in Europe.[12] Europeans brought wheat and dairy to the New World, which local populations were

[10] Drake, Morgan. "Big Agriculture and Harm to Minority Communities: How Administrative Civil Rights Complaints Are the Solution." *BYU Law Review* 2019, no. 4 (August 21, 2020).

[11] Drake, Morgan. "Big Agriculture and Harm to Minority Communities: How Administrative Civil Rights Complaints Are the Solution." *BYU Law Review* 2019, no. 4 (August 21, 2020).

[12] Earle, Rebecca. *The Body of the Conquistador: Food, Race, and the Colonial Experience in Spanish America, 1492-1700*. Cambridge, UK: Cambridge University Press, 2013.

not acclimated to eating. Settlers also imported and bred livestock, whose populations flourished by grazing on plantations of native nutritious crops such as beans, gourds, and maize.[13] The influx of imported animals also required grazing land, which settlers frequently dedicated local farms to, and thus further destroying many of the caloric and medicinal plants Native Americans had fostered, destabilizing their original food systems.[14] These casual changes for settlers had grave consequences on local populations, and ultimately forced surviving Indigenous groups to rely on the food of settlers. Additionally, the expensive import of the European diet became a sign of wealth and status in colonial societies, while traditional foods were given the reputation of poor and "savage".[15] Through both the scarcity of traditional foods and social and economic pressure to conform to settler food systems, colonization began to change the diet of Indigenous peoples in North America.

As the colonization process progressed, Indigenous people were intentionally withheld from their traditional foods to assimilate into white society and reduce independence. One way this process of cultural erasure became institutionalized was through residential boarding schools, which were common in the U.S. and Canada until the late 20th century.[16] These institutions removed aboriginal children from their communities and access to ancestral knowledge and taught them Western customs around food and eating. Additionally, residential schools kept children from learning traditional farming or subsistence hunting methods. Instead,

[13] Earle, Rebecca. *The Body of the Conquistador: Food, Race, and the Colonial Experience in Spanish America, 1492-1700*. Cambridge, UK: Cambridge University Press, 2013.
[14] Earle, Rebecca. *The Body of the Conquistador: Food, Race, and the Colonial Experience in Spanish America, 1492-1700*. Cambridge, UK: Cambridge University Press, 2013.
[15] Earle, Rebecca. *The Body of the Conquistador: Food, Race, and the Colonial Experience in Spanish America, 1492-1700*. Cambridge, UK: Cambridge University Press, 2013.
[16]Coté, Charlotte. "'Indigenizing' Food Sovereignty. Revitalizing Indigenous Food Practices and Ecological Knowledges in Canada and the United States." *Humanities* 5, no. 3 (2016): 57. https://doi.org/10.3390/h5030057.

they were taught to think minimally about food and ate a culturally foreign diet containing wheat, cheese, sugar, and domesticated meats.[17] A common phrase used to justify this cultural erasure was "Kill the Indian, Save the Man", implying that Indigenous children only held value if stripped of their cultural identity and indoctrinated with Western values.[18]

This divorce of Indigenous peoples from food autonomy incited trauma to be passed down for generations and facilitated much of the current cultural disconnect and health issues that Native American communities face today. Moreover that, due to the role the United States performed in this history, the federal government bears primary responsibility for these harms and has a moral obligation to remedy them.

The Role of the Food Distribution Program on Indian Reservations

Considering the current public health crisis in Native American communities and the United States government's historic role in causing and continuing these circumstances, the Food Distribution Program on Indian Reservations is one federal policy response to remediating this harm through increasing food security. The Food Distribution Program on Indian Reservations, abbreviated as FDPIR, was founded by the Food Stamp Act in 1977. It is intended as an alternative welfare program to the Supplemental Nutrition Assistance Program (SNAP) for households on or near Native American reservations, which are typically too far from grocery

[17] Coté, Charlotte. "'Indigenizing' Food Sovereignty. Revitalizing Indigenous Food Practices and Ecological Knowledges in Canada and the United States." *Humanities* 5, no. 3 (2016): 57. https://doi.org/10.3390/h5030057.

[18] Coté, Charlotte. "'Indigenizing' Food Sovereignty. Revitalizing Indigenous Food Practices and Ecological Knowledges in Canada and the United States." *Humanities* 5, no. 3 (2016): 57. https://doi.org/10.3390/h5030057.

stores that accept food stamps.[19] FDPIR is a subsidiary of SNAP, therefore it draws its funds from the federal budget for food stamps.

Roadmap

This thesis starts by explaining contemporary dietary struggles faced by Native Americans and lays historical background for how these relationships between Indigenous people, food, culture, and heath developed. I also discuss background context of the Food Distribution Program in the introduction. The methodology details my positionality in the food sovereignty movement. In the first main section, Chapter 4, I will discuss the role of FDPIR in alleviating food insecurity, including a review of existing literature about the pros and cons of the program, participant views, and how well it is currently meeting food security. The fifth chapter explores Indigenous goals for food sovereignty and evaluates FDPIR in context with these criteria, finding that government administration of the program does not fully meet these criteria and cannot without taking an assisting role to Indigenous leadership. Finally, the sixth chapter merges these into suggestions for how FDPIR can be reformed to realize Indigenous food sovereignty.

[19] Pindus, Nancy, and Carol Hafford. "Food Security and Access to Healthy Foods in Indian Country: Learning from the Food Distribution Program on Indian Reservations." *Journal of Public Affairs* 19, no. 3 (2019). https://doi.org/10.1002/pa.1876.

Chapter 2: Theoretical Framework and Terminology

This thesis is based on the premise that Indigenous peoples around the world have a right to govern themselves, including the ability to reemploy autonomous local food systems that were disrupted by colonization. This ideology is widely referred to as *Indigenous food sovereignty*. Coined in 1996 by La Via Campesina, the concept of food sovereignty refers to the right for people to define their own food systems, including the secure access to a healthy and culturally appropriate diet that is forged through ecologically sustainable means.[20]

Food Security vs. Food Sovereignty

Since this thesis is in context with a federal policy, my research largely operates under the U.S. Department of Agriculture definition of food insecurity: a lack of consistent access to enough food for an active, healthy life.[21] This definition is loosely based on the 1996 FAO World Food Summit definition, which I also take into consideration, which is that "food security exists when all people, at all times, have physical and economic access to sufficient, safe and nutritious food that meets their dietary needs and food preferences for an active and healthy life".[22] The FAO definition of food security provides context about physical and economic access, which is essential to consider with the issues of food deserts and economic disenfranchisement that rural Native Americans face. I also chose to interact with the USDA definition as it contains several notches of food insecurity, with marginal food security at the least severe and very low food

[20] 15 January 2003 Food Sovereignty. "Food Sovereignty: Via Campesina." Via Campesina English, January 15, 2003. https://viacampesina.org/en/food-sovereignty/.

[21] "Definitions of Food Security." United States Department of Agriculture Economic Research Service, September 8, 2021. https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-u-s/definitions-of-food-security/.

[22] "Policy Brief Food Security - Fao.org." Food and Agriculture Association of the United Nations. Accessed May 2, 2022. https://www.fao.org/fileadmin/templates/faoitaly/documents/pdf/pdf_Food_Security_Cocept_Note.pdf.

security at the most.[23] Households experiencing marginal food security report generally having enough to eat, but anxiety over having a steady supply of food or a lack of access to diverse and desirable foods. These definitions with degrees of food insecurity are important to differentiate as participants in FDPIR have responded with disinterest and repetition over distribution packages even if the content meets basic nutritional requirements.

Criteria for Food Sovereignty

Part of the implementation process of the food sovereignty movement means de-corporatizing and de-bureaucratizing agriculture and placing the means of production and distribution in the hands of small farmers and local communities, whose use of more traditional farming methods can be more resilient, stable, and eco-friendly than the modern industrial structure.[24] Through my review of recent Native American-led research, I have compiled a list of Indigenous criteria for food sovereignty. The following are the top five most stated definitions and desires of Indigenous food sovereignty:

To meet Indigenous food sovereignty, food systems should...

1. Be culturally relevant
2. Improve Health Outcomes
3. Be non-exploitive and foster reciprocal relationships with people and the environment
4. Contribute to a sustainable local economy

[23] "Definitions of Food Security." United States Department of Agriculture Economic Research Service, September 8, 2021. https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-u-s/definitions-of-food-security/

[24] Altieri, M.A., Funes-Monzote, F.R. & Petersen, P. Agroecologically efficient agricultural systems for smallholder farmers: contributions to food sovereignty. *Agron. Sustain. Dev.* 32, 1–13 (2012). https://doi.org/10.1007/s13593-011-0065-6

5. Allow consumers and producers meaningful choices and autonomy

Cultural Relevancy

Restoring ties to traditional foods is an essential aspect of food sovereignty. The practices of growing, producing, processing, and using traditional foods for symbolic practice are an important way that Indigenous people connect with their cultures and strengthen community relationships. In their essay *People of the Corn,* Dennis Wall and Virgil Masayesva realize this concept by discussing the spiritual and historic importance that heirloom corn varieties maintain in the Hopi culture. For Hopi peoples, "corn is the central bond" used for sustenance, prayer offering, ceremonial object, and symbol of their survival, since they have used it to sustain themselves throughout their people's history.[25] Traditional foods represent nurture of generations and have allowed for the development of culture. Further, the protection of heirloom seeds and varieties by Native peoples has historic significance and can also bolster food security when other varieties have been struck by disease and disaster.[26] In other words, eating traditional foods has multiple benefits and fostering aboriginal varieties helps to honor past generations as well as preserve livelihoods for the survival of the present and future generations. This level of resilience and self-sustainability is unreachable by food security alone, which strives only to relieve hunger.

[25] Wall, Dennis, and Virgil Masayesva. "People of the Corn: Teachings in Hopi Traditional Agriculture, Spirituality and Sustainability." Essay. In *Indigenous Food Sovereignty in the United States: Restoring Cultural Knowledge, Protecting Environments, and Regaining Health*, 209–22. Norman: University of Oklahoma Press, 2019.
[26] Mares, Teresa M., and Devon G. Peña. "Environmental and food justice." *Cultivating food justice: Race, Class, and Sustainability.* (2011): 197-220.

Public Health

Enacting food sovereignty is essential for Native Americans to improve public health in their communities. Current industrialized food systems have created a hostile environment for low income and rural Americans to achieve healthy eating as well as made it difficult for Indigenous people to practice culturally appropriate diets. This concept is what Melanie Lindholm (2014), expert on Alaska Native foodways, coins as "nutritional colonialism". Nutritional colonialism refers to the swift pace at which Native American diets changed from subsistence foods and hunting and gathering to industrialized diets. Lindholm characterizes nutritional colonialism as many things: an erasure of subsistence lifestyles, cultural suppression, increased prices of food and denial over control of prices, privatization of food collection, lack of cultural appropriateness of food choices, increased dependence on outside food systems, a focus on profit and cash necessity to be fed, fostering sedentary lifestyles, a negation of dominant sense of responsibility, environmental damage and pollution of traditional foodways, and increased rates of chronic diseases.[27]

The effects of such "nutritional colonialism" on Indigenous health outcomes are bleak. In Lindholm's example of Alaska Natives, who traditionally relied on Arctic seafood high in omega-3 fatty acids, their cultural diets protect against cancer, heart disease, diabetes and promote a healthy psyche. Pre-colonization, Alaska Natives had very low rates of such diseases. Post-colonization and industrialization, over-fished waters, environmentally polluted seafood, and easy access to unhealthy and unfamiliar foods have now caused Alaska Natives to have

[27] Lindholm, Melanie M. "Alaska Native Perceptions of Food, Health, and Community Well-Being." Essay. In *Indigenous Food Sovereignty in the United States: Restoring Cultural Knowledge, Protecting Environments, and Regaining Health*. Norman: University of Oklahoma Press, 2019.

some of the highest rates of these nutrition based diseases and psychological disorders in the world.[28] Participants from Lindholm's study responded that this nutritional colonialism has deeply affected their mental health as well as physical health – in addition to nutrition based health disorders, Alaska Native communities now experience high rates of alcoholism, substance abuse, crime, and domestic violence. When asked whether this was at all related to food systems, many participants stated that say that this divorce from food sovereignty has resulted in "cultural genocide" of their society and mental health issues such as addiction to food or alcohol is symptomatic of coping with an existential issue as extreme as complete cultural disconnect.[29] Lindholm also notes that there is a lack of amplification of this relationship between disrupted food systems and poor mental health. In conclusion, eating historically unfamiliar diets has at been at least partially responsible for worsening physical and mental health for Indigenous Americans and improving health outcomes through food is an essential part of food sovereignty. Focusing on food security alone is without sensitivity to which foods can be used to reverse poor health, and thus for improving public health, the focus should be on regaining food sovereignty.

Non-Exploitation and Equal Relationships

An overarching theme of requirements for food sovereignty is equal relationships and a sense of care for others. Given that colonization destroyed many aspects of Indigenous autonomy in the United States, relationships and power dynamics between the government and tribes need to be equal in order to begin to repair colonial damage. If the goal of food security is to make sure people are fed, the goal of food sovereignty may be to make sure people can feed

[28] Lindholm, Melanie M. "Alaska Native Perceptions of Food, Health, and Community Well-Being." Essay. In *Indigenous Food Sovereignty in the United States: Restoring Cultural Knowledge, Protecting Environments, and Regaining Health*. Norman: University of Oklahoma Press, 2019.
[29] Lindholm, Melanie M. "Alaska Native Perceptions of Food, Health, and Community Well-Being." Essay. In *Indigenous Food Sovereignty in the United States: Restoring Cultural Knowledge, Protecting Environments, and Regaining Health*. Norman: University of Oklahoma Press, 2019.

themselves and do so in the way they choose, without dependency on a hegemonic group. For this reason, for FDPIR to work towards food sovereignty, nurturing equality must be at the forefront of institutional reform.

Sustainable Local Economies

Being able to source food locally is an essential aspect of Indigenous food sovereignty. Partnering with regional producers helps to strengthen local economies allows tribes the ability to invest in growers within their communities and keep finances within their jurisdiction, and in the long run, reduces dependence on outside sources and the State.[30] Contributing to sustainable, local, economies also boosts the performance of other goals of food sovereignty, such as increasing equality and creating greater access to culturally relevant foods via sourcing from Native growers. Additionally, small hold farmers are more likely to engage in agroecological efforts, create internal systems that reduce extra inputs and waste, and harness the advantages of their local ecosystems.[31] Compared to larger farms, which can be more exploitive and monopolize the food industry, investing in local farmers can redistribute wealth and is both more economically and environmentally sustainable. To make long term improvements in dependency and sovereignty, FDPIR should focus on using its resources to support local economies.

Consumer and Producer Choice

Food sovereignty cannot exist without consumer and producer choice. The Nyéléni Declaration (2007) claims that food sovereignty "puts the aspirations and needs of those who

[30] Hoover, Elizabeth. "'You Can't Say You're Sovereign If You Can't Feed Yourself.'" Essay. In *Indigenous Food Sovereignty in the United States: Restoring Cultural Knowledge, Protecting Environments, and Regaining Health*. Norman: University of Oklahoma Press, 2019.
[31] Pimbert, Michel. "Food Sovereignty and Autonomous Local Systems." *RCC Perspectives*, no. 1 (2015): 37–44. http://www.jstor.org/stable/26241305.

produce, distribute and consume food at the heart of food systems and policies, rather than the demands of markets and corporations".[32] This is considered an update of the 2002 La Via Campesina definition, which states that individuals should be able to choose the extent to which they are self-sufficient.[33] Both statements stand with importance, as individual choice and collective choice are both necessary in achieving food sovereignty, as this fosters equality, democracy, and independence. FDPIR should thus focus on increasing consumer choice and producer autonomy in its attempts to fulfil food sovereignty.

These criteria are utilized in Chapter 5 to assess how FDPIR in its current state marks or misses these benchmarks for Indigenous food sovereignty. Findings from that section will shape my recommendations as to which reforms FDPIR should make to meet food sovereignty, including reinstating the Vendor Pilot Program, which was an attempt to regionalize food procurement and distribution in FDPIR from 2013-2015.[34]

The Purpose of Food Sovereignty in Law

In the United States, the focus on food sovereignty has been largely promoting grassroots activism and bottom-up change. Proliferating literature on the subject lacks the exploration of top-down approaches to implementing food sovereignty. While local movements have the best understanding of what place-specific food sovereignty requires, they lack the widespread power and institutional change that law holds. Therefore, both efforts should be used

[32] "Declaration of Nyéléni." Nyeleni.org, February 27, 2007. https://nyeleni.org/spip.php?article290.
[33]Agarwal, Bina. "Food Sovereignty, Food Security and Democratic Choice: Critical Contradictions, Difficult Conciliations." *The Journal of Peasant Studies* 41, no. 6 (January 17, 2014): 1247–68. https://doi.org/10.1080/03066150.2013.876996.

[34] Chami, R., Geller, D., Gordon, E., Hafford, C., & Hillabrant, W. (2016). Food Distribution Program on Indian Reservations Regional Vendor Pilot Assessment. Prepared by Manhattan Strategy Group for the U.S. Department of Agriculture, Food and Nutrition Service (available online at www.fns.usda.gov/researchand-analysis).

in tandem for the most effective change. Additionally, attempts to reform an existing policy may enact change more quickly than drafting new legislation and implementation. Given the historically paternalistic relationship between the State and Native Americans, attempts to repair Indigenous food systems by the government should not only strive for food security but allow Indigenous communities to regain decision making in all aspects of feeding their communities. That is the first step in solving these multifaceted issues with cultural connection and public health and underpins food sovereignty. This historic struggle with agency and self-determination is the key reason why food sovereignty is a more appropriate goal for a Native American welfare program than food security. Consequently, my research aims to fill this gap in the literature by exploring centralized attempts at implementing food sovereignty through potential reforms of an existing policy framework, the Food Distribution Program on Indian Reservations.

Chapter 3: Methodology

It is important to note my personal identity and ideology with the lens through which I conduct and present my research. While this thesis focuses on centering Indigenous views of food sovereignty and food policy reform, I am not Indigenous. I do not believe that there is anything substantive I can contribute better to the Indigenous food sovereignty movement than that community themselves. I do, however, maintain an advantage through the privilege that accompanies me as a white student studying in a graduate program. I would like to use those privileges to amplify the call of Indigenous leaders of the movement to help shift discourse in academia towards paying more attention to the voices of Indigenous food sovereignty activists. My perspective may also help to bridge the gap between BIPOC food sovereignty movements and white ones, which somewhat struggle to understand the importance of fulfilling first-tier needs and removing structural barriers to food access before fighting for privileges, such as eating local and organic.[35] Thus, my thesis is an attempt at allyship to Indigenous food sovereignty and a highlight that non-Native food sovereignty activists need to acknowledge the Indigenous basis and knowledge in this field to be successful and wholistic, and that engagement between both movements can be mutually beneficial.

My research constraints are consistent with my goals – my work has been mostly a review of secondhand sources written directly by Native American scholars and activists, as an overarching goal of this thesis is to highlight the voices of Indigenous people. The first step of my research was reading a collection of essays from different authors in the movement (edited by Elizabeth Hoover and Devon Mihesuah) to determine which characteristics of food

[35] Guthman, Julie. "Bringing Good Food to Others: Investigating the Subjects of Alternative Food Practice." *cultural geographies* 15, no. 4 (2008): 431–47. https://doi.org/10.1177/1474474008094315.

sovereignty are most commonly stated and which can be transformed into policy. Next, after identifying my five criteria, I searched for these terms via online databases such as Google Scholar and JSTOR: “culturally relevant”, “traditional foods”, “Native American public health”, “food security”, “food deserts”, “food welfare”, “food sovereignty”, and “reservations”; limiting the years of publishing from 2012-2022. Several articles were linked to the Food Distribution Program, and after considering its national framework yet small enough sample size, I chose FDPIR for analysis. I searched for primary sources, such as studies and reports regarding opinions of FDPIR participants, health impacts of FDPIR foods, budget and other administrative statistics, and additionally reviewed some of the secondary work other scholars cited these materials by. The majority of what I’ve reviewed is from the last five years, as another goal is to produce timely and relevant work that can be used to solve modern problems in American food policy.

Chapter 4: FDPIR Successes and Discontents

This section discusses the reality of the Food Distribution Program on Indian Reservations at the ground level from my literature review. In existing research, FDPIR has been regarded as successful in providing healthier options than other food welfare programs and more wholistic in its approaches to promoting health. On the other hand, FDPIR has been criticized for struggling to meet the needs of the extremely-food insecure, partially neglecting its older participants, and lacking variety and culturally relevant foods in its packages. In this chapter, I ultimately conclude that FDPIR is only meeting marginal food security, based on its own USDA criteria, as many participants who rely exclusively on FDPIR report struggling with having enough food or diverse diets and 22% of FDPIR households remain extremely food insecure. I also use these examples of failures from within FDPIR to explain why reaching for food security alone is not enough to solve deeper issues faced by FDPIR's participants. On the other hand, I argue that between providing nutrition education and exercise classes and beginning to incorporate traditional foods, FDPIR is, in this regard, on target with some of the more points proposed by Indigenous food sovereignty leaders, but without giving agency to such leaders to execute these programs themselves. By detailing FDPIR's good intentions and discussing where the program falls short of community goals, I highlight the importance of food sovereignty, not over, but beyond food security and centering Indigenous leaders at the forefront of this program.

FDPIR Description

Founded by the Food Stamp Act in 1977, the Food Distribution Program on Indian Reservations is an alternative to the Supplemental Nutrition Assistance Program (SNAP) for households on or near Native American reservations, which are typically too far from grocery

stores that accept food stamps.[36] FDPIR draws its funds from the federal budget for food stamps. The U.S. Department of Agriculture purchases and ships bulk foods to Indian Tribal Organizations and state agencies, and these sections are responsible for storing and distributing packages, as well as determining member eligibility and logistics of the program at the local level.[37] The program is designed for enrolled tribal families living on reservations, but non-Indigenous households living on reservations are eligible, as well homes near reservations that have at least one Native American enrolled tribal member living there. Only one household member needs to be eligible for benefits, but packages are based on the size of the whole family.[38] Participants receive monthly packages with frozen proteins, canned and frozen produce, dried grains and flour, preserved dairy products, liquid scrambled eggs, dried legumes, and condiments. Depending on the location, participants may have the option to choose fresh fruits and vegetables as well as fresh eggs. Not only to does FDPIR provide grocery aid, but extra grants for FDPIR also go local to ITOs for nutrition education and other relevant programs. FDPIR currently serves 276 tribes through 102 tribal organizations and three state agencies.

Strengths of FDPIR

In 2016, Shanks et al conducted qualitative interviews with participants of FDPIR and credited the Food Distribution Program on Indian Reservations for its efforts in increasing food security for two main reasons: high nutrition score and educational incentives. The authors found

[36]Pindus, Nancy, and Carol Hafford. "Food Security and Access to Healthy Foods in Indian Country: Learning from the Food Distribution Program on Indian Reservations." *Journal of Public Affairs* 19, no. 3 (2019). https://doi.org/10.1002/pa.1876.

[37] Mucioki, Megan, Jennifer Sowerwine, and Daniel Sarna-Wojcicki. "Thinking inside and Outside the Box: Local and National Considerations of the Food Distribution Program on Indian Reservations (FDPIR)." Elsevier. Journal of Rural Studies, December 6, 2017.

[38] "Chapter 13 Food Distribution Program on Indian ... - USDA ERS." Accessed January 29, 2022. https://www.ers.usda.gov/webdocs/publications/46556/30235_fanrr19-3m_002.pdf?v=0.

scores by rating a series of randomly-generated possible food packages based on SAS code for measuring for macronutrients such as fats, carbohydrates and proteins versus those with "empty calories", or foods lacking significant nutritional value.[39] Firstly, when examined regarding the Healthy Eating Index (HEI-2005 & HEI-2010), FDPIR received not only a higher score than other federal food assistance programs, which translates to a better nutritional value, but higher than the average American's diet. Five randomized samples of realistic packages from FDPIR received a score of 81 out of 100, while SNAP participants scored 47 out of 100, and the American average diet (not on welfare) was 58.[40] The authors of this study note that lower scores for other food programs such as SNAP and WIC may be that their available products contain more added sugars and processing than those of FDPIR, which centers around giving participants whole foods. Added sugars and processed foods are considered "empty calories" and score lower than macronutrients. Additionally, bias may occur in the fact that SNAP and WIC participants choose their own food items at the store, while the choices given to FDPIR participants are typically between fresh versus frozen whole foods, which rank similar in nutritional value. Regardless of this choice, FDPIR participants receive assorted grocery packages, which tend to contain whole ingredients as opposed to premade meals and snacks common in food stamp options.[41]

[39] Byker Shanks, Carmen, Teresa Smith, Selena Ahmed, and Holly Hunts. "Assessing Foods Offered in the Food Distribution Program on Indian Reservations (FDPIR) Using the Healthy Eating Index 2010." Public health nutrition. U.S. National Library of Medicine, May 2016. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5439495/.

[40] Byker Shanks, Carmen, Teresa Smith, Selena Ahmed, and Holly Hunts. "Assessing Foods Offered in the Food Distribution Program on Indian Reservations (FDPIR) Using the Healthy Eating Index 2010." Public health nutrition. U.S. National Library of Medicine, May 2016. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5439495/.

[41] Byker Shanks, Carmen, Teresa Smith, Selena Ahmed, and Holly Hunts. "Assessing Foods Offered in the Food Distribution Program on Indian Reservations (FDPIR) Using the Healthy Eating Index 2010." Public health nutrition. U.S. National Library of Medicine, May 2016. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5439495/.

Secondly, FDPIR has instituted educational initiatives that provide health incentives which other food distribution programs like SNAP lack. As part of FDPIR, the Food Distribution Nutrition Education Program provides extra grants to participating ITOs who instruct educational lessons surrounding the importance of exercise, nutrition, and how to make healthy lifestyle choices. These programs have been received well – more than half of the participants in the 2019 Pindus et al. study reported changing their cooking and eating habits after attending educational training, and 70% of participants who attended fitness classes began to exercise more regularly.[42] This financial incentive goes beyond achieving food security and aims to focus on overall health as well as creates more career opportunities within tribal communities. However, it is important to note that these educational initiatives lack Indigenous knowledge in their teachings and remain culturally neutral, which may be a hindrance in convincing Native participants to improve their health and wellness.

Weaknesses of FDPIR

Despite these advantages, my cross-analysis of both the Pindus and Shanks studies indicate that the Food Distribution Program on Indian Reservations maintains 4 key areas to improve, two socially rooted problems and two nutritionally rooted. In terms of social improvements to the program, FDPIR has yet to solve extreme food-insecurity and should update the program to accommodate changing participant demographics. In terms of nutrition of the foods provided, FDPIR can still work on diversifying foods and adding more fresh produce and traditional foods to distribution bundles.

[42] Pindus, Nancy, and Carol Hafford. "Food Security and Access to Healthy Foods in Indian Country: Learning from the Food Distribution Program on Indian Reservations." *Journal of Public Affairs* 19, no. 3 (2019). https://doi.org/10.1002/pa.1876.

A study conducted by Nancy Pindus and Carol Hafford (2015) found that despite the benefits afforded by FDPIR, food security among low-income Native Americans remains extremely sparse: for 38% of participants, FDPIR allotments were the only source of groceries, making 34% of the recipients fall into the low food security category and 22% fall into the extremely low food security category. Additionally, the authors note that "almost 12% of FDPIR households had no source of earned or unearned income and bartered to meet their needs. About 68% of zero-income households were one-person households."[43] This is a common trend amongst Indigenous communities across the United States: even with federal and local food assistance, Alaska Natives/American Indians (AIAN) are twice as likely to experience food insecurity than White Americans, and typically report unemployment 10% more than average American unemployment rates.[44] This is evident that food security is not enough to solve structural issues in Native economies, as it only provides temporary, dependent stability, and that without a wholistic approach to improving Native livelihoods and bolstering financial independence, efforts to maintain food security are somewhat futile.

There is also a shift in recipient demographics affecting the efficiency of the Food Distribution Program – since the last census study in 1990, participation by children in the program has decreased while elder participation has increased. Certain issues need to be addressed regarding this, such as considerations as to why young people are less likely to apply, why elders need more support, and how the program can shift priorities to best aid changing

[43] Pindus, Nancy, and Carol Hafford. "Food Security and Access to Healthy Foods in Indian Country: Learning from the Food Distribution Program on Indian Reservations." *Journal of Public Affairs* 19, no. 3 (2019). https://doi.org/10.1002/pa.1876.

[44] Pindus, Nancy, and Carol Hafford. "Food Security and Access to Healthy Foods in Indian Country: Learning from the Food Distribution Program on Indian Reservations." *Journal of Public Affairs* 19, no. 3 (2019). https://doi.org/10.1002/pa.1876.

demographics of participants. For example, the survey performed by Pindus et al. found that despite the benefits of nutrition and exercise education classes, issues such as lack of transportation became barriers to participation.[45] Transportation reliability was also found to be a more severe issue when considering demographics in Mucioki's study, as elderly and immuno-compromised participants who are less mobile were more impacted when deliveries were late or missed entirely.[46]

In regard to nutritional setbacks, other participants did not experience food insecurity in the traditional sense, but what is defined by USDA as "marginal food insecurity", which includes other frustrating realities such as poor quality, variety, and desirability of foods received.[47] Some participants reported moldy and rotting fruits and vegetables, and others even reported no fresh produce included whatsoever, even though that is a main guarantee of the program.[48] Many of the items issued by FDPIR are canned, frozen, preserved, or dried, and are cheaper alternatives to healthier or fresh foods bought in bulk. The USDA spends an average of less than $2 a day per FDPIR participant and quality is often sacrificed for price.[49] These aspects of quality and their impacts on the recipients is somewhat overlooked by basic definitions of food security. For example, corn syrup, shortening, and juice concentrate often replace sugar/honey, oil, and fresh fruits in FDPIR packaging which are higher in additives, sugar and preservatives and are thus

[45] Pindus, Nancy, and Carol Hafford. "Food Security and Access to Healthy Foods in Indian Country: Learning from the Food Distribution Program on Indian Reservations." *Journal of Public Affairs* 19, no. 3 (2019). https://doi.org/10.1002/pa.1876.

[46] Mucioki, Megan, Jennifer Sowerwine, and Daniel Sarna-Wojcicki. "Thinking inside and Outside the Box: Local and National Considerations of the Food Distribution Program on Indian Reservations (FDPIR)." Elsevier. Journal of Rural Studies, December 6, 2017.

[47] ibid.

[48] ibid.

[49] ibid.

more harmful to human health.[50] Some of these groceries issued by FDPIR are recommended to avoid or limit by the federal nutrition guidelines, conveying a level of hypocrisy within government administration of the program.[51] Furthermore, participants report that foods delivered by the program lack cultural relevancy and incorporating more local historically consumed foods would improve the program.

Secondly, even though FDPIR scores higher in nutrition than other food assistance programs, the HEI-2010 test reports that FDPIR packages are still lacking key nutritional products and have areas to improve. Shanks et al. report that "the current study shows that, although there was no significant difference, the HEI-2010 scores for Whole Fruit, Whole Grains, Seafood and Plant Proteins, and Fatty Acids also fell short of the maximum HEI-2010 score indicating a potential need to improve options within these categories."[52] Calorically, FDPIR is meeting food security but not nutritionally.

Discussion of the Food Distribution Program on Indian Reservations

Between surveys conducted by Pindus's team in Native reservations nationwide and Mucioki and others' regional research of recipients in the Klamath River Basin, participants of the Food Distribution Program across the United States had overwhelmingly similar requests for

[50] Chapter 13 Food Distribution Program on Indian Reservations." Accessed January 29, 2022. https://www.ers.usda.gov/webdocs/publications/46556/30235_fanrr19-3m_002.pdf?v=0.

[51] "Dietary Guidelines for Americans." Accessed January 29, 2022. https://www.dietaryguidelines.gov/sites/default/files/2020-12/Dietary_Guidelines_for_Americans_2020-2025.pdf.

[52] Byker Shanks, Carmen, Teresa Smith, Selena Ahmed, and Holly Hunts. "Assessing Foods Offered in the Food Distribution Program on Indian Reservations (FDPIR) Using the Healthy Eating Index 2010." Public health nutrition. U.S. National Library of Medicine, May 2016. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5439495/

improvement: invest more in traditional foods, local and fresh produce, and give better support to participants whose food security relies entirely on FDPIR distribution boxes.

Mucioki et al. notes that the current structure of the USDA purchasing the cheapest possible food does not save the United States more money in the long run, as this leads to nutrition related illnesses such as Type II diabetes, which costs nearly twice as much in medical expenses to treat than that of the average person.[53] Given the responses from their interviewees, Mucioki et al. calls on the Food Distribution Program on Indian Reservations to include more healthy and culturally relevant foods that have sustained Indigenous health historically. Integrating regional heirloom varieties in FDPIR packages can not only make it easier to include fresh produce but has the potential to fulfil a more self-sustained vision of food security and food autonomy and invest in the sustainability of Indigenous public health.[54]

Lastly, FDPIR must reconsider its position of being a supplemental food program when results from both Mucioki and Pindus's studies indicate many participants from reservations across the United States rely on FDPIR as their exclusive source of diet. Extremely low-food security participants would benefit from a sliding scale system, with the most impoverished members receiving greater allotments. In consideration to this vulnerable group, FDPIR must focus more on reliable deliveries and ensuring freshness of foods, which may be solved by allowing local Indian Tribal Organizations to oversee purchasing and delivering local foods, also contributing to food sovereignty.

[53] Peterson, Matt. "Economic Costs of Diabetes in the U.S. in 2012." *Diabetes Care* 36, no. 4 (2013): 1033–46. https://doi.org/10.2337/dc12-2625.

[54] Mucioki, Megan, Jennifer Sowerwine, and Daniel Sarna-Wojcicki. "Thinking inside and Outside the Box: Local and National Considerations of the Food Distribution Program on Indian Reservations (FDPIR)." Elsevier. Journal of Rural Studies, December 6, 2017.

Ultimately, as the largest food assistance program used by Indigenous people in the United States, the Food Distribution Program on Indian Reservations has both its benefits and drawbacks. The most redeeming qualities of the program are its focus on prioritizing whole ingredients and its wholistic approach to nutrition by incorporating educational initiatives. Compared to other food assistance programs like SNAP and WIC, whose major purpose is providing shopping coupons, FDPIR is advanced in the realm of American food welfare initiatives in terms of health focus. However, despite these benefits, FDPIR maintains major setbacks that keep it from solving more persistent issues faced by its participants. Many recipients of the program remain impoverished and food-insecure, packages largely lack fresh, healthy, and culturally relevant ingredients, and FDPIR has failed to adapt to changing circumstances among its participants over recent years. For this reason, I argue that FDPIR is only meeting marginal food security based on the USDA definition since some participants are still food insecure and the ones who technically have enough to eat express disinterest or over-repetitiveness of foods.[55] Many of these issues can be solved with incorporating Native community members more at the ground level and reducing participant reliance on the State. With guidance from Indigenous experts, improvements can be made to the Food Distribution Program to move past basic ideas of food security and meet the principles of Indigenous food sovereignty.

Why Food Security is Not Enough

Ultimately, if the wish of Indigenous food justice is to create long term improvements to health outcomes, protect cultural rights and the environment, and create self-sufficient local

[55] "Definitions of Food Security." United States Department of Agriculture Economic Research Service, September 8, 2021. https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-u-s/definitions-of-food-security/.

economies without exploitation, striving for food security alone does not provide the framework to support these goals. Food security initiatives, such as FDPIR, solely focus on short-term, temporary fixes for hunger and financial instability, but negate the long-term sustainability and independence of food systems that is necessary to reach Indigenous food sovereignty. This is seen by repeated evidence of FDPIR choosing to focus on providing the most food for the least expense, which places community-based priorities such as improving health outcomes at the bottom of the ladder. Additionally, with FDPIR situated as a welfare program, Native Americans will continue to be dependent on the U.S. government for food support and are subject to political volatility. Fowler (2002)[56] and Cattelino (2006)[57] argue that given this colonially rooted dependence, tribal social service administration is a major desire for Indigenous sovereignty. Efforts to achieve food sovereignty, through allocating more administrative control to tribes, will be able to prioritize traditional and healthy foods and place Native growers at the heart of production and control. For this purpose, the next chapter focuses on evaluating the Food Distribution Program through the lens of five common criteria for Indigenous Food Sovereignty.

[56] Fowler, Loretta. *Tribal Sovereignty and the Historical Imagination: Cheyenne-Arapaho Politics*. Lincoln: University of Nebraska Press, 2002.

[57] Cattelino, Jessica. "Florida Seminole Housing and the Social Meanings of Sovereignty." *Comparative Studies in Society and History* 48, no. 3 (2006): 699–726. doi:10.1017/S0010417506000272.

Chapter 5: Evaluating FDPIR Through the Lens of Indigenous Food Sovereignty

This chapter aims to draw upon the voices of Indigenous scholars and activists in their specific definitions of food sovereignty and what these goals and criteria mean for reforming the Food Distribution Program on Indian Reservations. I will contrast this to food security and explain how regaining control of food systems can improve Indigenous health outcomes and honor cultures. I find that achieving food security is not enough to meet these goals and employing ideals of food sovereignty are more fruitful solutions. Moreover, through evaluating FDPIR against the five most cited goals of Indigenous food sovereignty, I find that the program is currently not fully satisfying any of these criteria due to overcentralized State control and must allocate more power to Indigenous communities on a regional level to meet true food sovereignty.

Voices from the Movement

Besides La Via Campesina's original definition, the right to define one's own food systems, there are many social, environmental, and economic theories of what specifically constitute food sovereignty. On the global scale, the Nyéléni Declaration (2007) is one of the cardinal pieces of literature within the food sovereignty movement, citing the various requirements for food sovereignty that are unfulfilled by food security alone. The Declaration firstly calls for putting the "aspirations and needs of those who produce, distribute and consume food at the heart of food systems and policies rather than the demands of markets and corporations".[58] The Nyéléni Declaration also takes a strong stance against the neo-liberalization of food systems, free trade, and capitalist food structures. This proclamation calls for a more

[58] "Declaration of Nyéléni." Nyeleni.org, February 27, 2007. https://nyeleni.org/spip.php?article290.

socially sustainable solution to food security, wherein instead of creating programs to simply feed the hungry, where hegemonic groups remain in control and the marginalized stay dependent, vulnerable groups become empowered to be able to feed themselves and make decisions around food that are about more than just hunger and cost reduction – ultimately defining food sovereignty. It is important to use these varied definitions of food sovereignty to analyze specific aspects and processes of FDPIR that may be changed to better contribute to food sovereignty.

Beyond that, Indigenous activists from food sovereignty initiatives around the United States have contributed to expanded definitions and requirements for Indigenous food sovereignty based on their unique focuses. In 2014, Mohawk food sovereignty expert, Elizabeth Hoover, traveled to speak with community leaders in various Indigenous food movements around the country to ask what food sovereignty meant to them. In Hoover's survey, many responded that the ability to eat food that is connected to their cultural identity and local environment were important criteria. In order to eat traditional foods, most said access to land, resources, human rights, and ancestral knowledge was necessary. Others said that food sovereignty depended on governance at tribal, community and individual levels with reference to Raj Patel's proclamation that choice in diet is a right, not a privilege.[59] Some participants stated that protecting heritage seeds and creating seed banks were major factors in catalyzing their local movements. Many also responded that a transition to food sovereignty would restore types of relationships that are lost in the industrial food system, such as a reciprocal relationship with

[59] Patel, Raj. "Food Sovereignty." *The Journal of Peasant Studies* 36, no. 3 (2009): 663–706. https://doi.org/10.1080/03066150903143079.

nature. One respondent (Jeremy Clain, Ojibway community) stated that his simple mantra for food sovereignty is "take care of the environment and it will take care of you".[60] In terms of land and resources, some respondents said that their food sovereignty initiatives strived to invest in food producers within their jurisdiction. Specifically, Winona LaDuke, Ojibwe economist and politician, told Hoover that a survey of the Ojibwe White Earth tribe discovered that they were spending 25% of their economy on food and much of it was being spent outside tribal borders.[61] Creating a strong local economy wherein tribes can support growers on the reservation not only contributes to a self-sufficient agronomy but can create jobs, alleviate poverty, and reduce dependency.

In all, varied definitions of what is required for true food sovereignty from those involved in the movement all include some aspects that are lost in fighting for food security alone. From my research, these are the five most common desires for sovereign food systems: cultural relevancy, non-exploitation (of people and the environment), improvement of health outcomes, contribution to a sustainable local economy, and consumer/producer choice. Below, I analyze the ways in which FDPIR compares to these goals, ultimately finding that in its current state, the Food Distribution Program on Indian Reservations has stagnated at reaching only marginal food security and fails to fully meet any of these criteria for food sovereignty.

[60] Hoover, Elizabeth. "'You Can't Say You're Sovereign If You Can't Feed Yourself.'" Essay. In *Indigenous Food Sovereignty in the United States: Restoring Cultural Knowledge, Protecting Environments, and Regaining Health*. Norman: University of Oklahoma Press, 2019.
[61] Hoover, Elizabeth. "'You Can't Say You're Sovereign If You Can't Feed Yourself.'" Essay. In *Indigenous Food Sovereignty in the United States: Restoring Cultural Knowledge, Protecting Environments, and Regaining Health*. Norman: University of Oklahoma Press, 2019.

Cultural Relevancy

Efforts from the Agricultural Marketing Service in partnership with the Food and Nutrition Service began to procure traditional foods for FDPIR packages in 2015 after receiving funding for a mandate that was passed in 2008.[62] This initial mandate included making contracts with two Native owned food brands. However, despite these efforts, FDPIR still has only a limited selection of traditional foods available in its packages, those of which are distributed evenly to all participants across the country, and with minimal increase of ownership by Native food companies. As of 2022, FDPIR provides six traditional foods in its packages: bison, catfish, blue cornmeal, sockeye salmon, walleye, and wild rice.[63] Besides only serving a few traditional foods, these ingredients are not distributed according to regional value. Mucioki et al. makes the example of FDPIR shipping blue cornmeal from Indiana to recipients on the West Coast – while this product is important to Plains Tribes, it has no cultural value to Indigenous people outside of that area, and costs more money and fossil fuels to ship and defeats the purpose of sourcing traditional foods. Instead, they suggest allowing ITOs to be involved with purchasing of foods instead of only the USDA, so that tribes can "produce and cultivate [food products] in a culturally appropriate manner without compromising cultural specifications to fulfill bulk orders".[64] This may also help bolster stronger internal economies, as local ITOs may opt to purchase goods from a local, Native owned farm. Participants from the Pindus et al. survey also

[62] Mucioki, Megan, Jennifer Sowerwine, and Daniel Sarna-Wojcicki. "Thinking inside and Outside the Box: Local and National Considerations of the Food Distribution Program on Indian Reservations (FDPIR)." Elsevier. Journal of Rural Studies, December 6, 2017. https://reader.elsevier.com/reader/sd/pii/S0743016717304199.

[63] "USDA Foods Available List for FDPIR." Food and Nutrition Service U.S. Department of Agriculture. USDA, March 4, 2022. https://www.fns.usda.gov/fdpir/usda-foods-available-list-fdpir.

[64] Mucioki, Megan, Jennifer Sowerwine, and Daniel Sarna-Wojcicki. "Thinking inside and Outside the Box: Local and National Considerations of the Food Distribution Program on Indian Reservations (FDPIR)." Elsevier. Journal of Rural Studies, December 6, 2017.

indicated a desire to be more involved with securing food. Hiring tribal members can also reduce high unemployment rates, solving one of the major underpinning issues causing food insecurity in Native communities.[65] This shift in administration of the program can bolster sovereign, self-sufficient Indigenous food systems and strengthen Native economies. Current administration appears to miss out on this opportunity: out of the seven companies that USDA purchases bison, cornmeal, rice, and salmon from, only two are Native owned brands.[66] This also means that the number of Native brands contracted by USDA for FDPIR has not increased since the advent of this initiative in 2015. This lack of consideration or knowledge for regional differences may be symptomatic of an overgeneralization of Native American diversity and an inadequate understanding of demographics overall. Further, sourcing mainly from non-Native vendors for traditional foods shows an absence of care to uplift Indigenous communities. To be a quality administrator of a welfare program, FDPIR must be keen to the nuances of the program's participants as well as care about their livelihoods. Since the main goals for FDPIR are food security and nutrition education[67], USDA is focused mainly on securing enough food, not making sure the foods are culturally relevant or that the program can support Native Americans in other ways or in the long term. USDA purchases all the food at the federal level[68] and is too centralized to have a ground level understanding of regional changes and preferences. The lack

[65] Pindus, Nancy, and Carol Hafford. "Food Security and Access to Healthy Foods in Indian Country: Learning from the Food Distribution Program on Indian Reservations." *Journal of Public Affairs* 19, no. 3 (2019). https://doi.org/10.1002/pa.1876.

[66] Mucioki, Megan, Jennifer Sowerwine, Dan Sarna-Wojcicki, and Karuk Tribe. "Integrating Traditional and Local Foods into the Tribal Commodities Program." University of California, Berkeley, March 13, 2018. https://nature.berkeley.edu/karuk-collaborative/wp-content/uploads/2019/06/FDPIR-policy-brief-March-13-2018.pdf.

[67] "FDPIR Program Fact Sheet." FDPIR Program Fact Sheet | Food and Nutrition Service, January 1, 2018. https://www.fns.usda.gov/fdpir/fdpir-fact-sheet.

[68] "FDPIR Program Fact Sheet." FDPIR Program Fact Sheet | Food and Nutrition Service, January 1, 2018. https://www.fns.usda.gov/fdpir/fdpir-fact-sheet.

of traditional foods alongside buying from outside the Native community and distributing them to the wrong places shows either an absence of administrative understanding of FDPIR's participants, or lack of care to truly improve Indigenous livelihoods through access to culturally relevant foods. While FDPIR has made some steps in working towards cultural relevancy of food packages by incorporating these foods, USDA's main goal is food security. Acknowledgements should be made for beginning to consider culturally relevant foods, but room for improvement remains to meet standards of cultural relevancy, and FDPIR currently does not meet this food sovereignty criterion.

Non-Exploitation and Equal Relationships

The Food Distribution Program maintains two major obstacles to meeting the goal of nonexploitation: unnecessary overuse of environmental resources and dependency of participants. In regard to environmental exploitation, the current model of food distribution in FDPIR is using more time, money and fuel than is necessary to administer the program. USDA purchases all foods for FDPIR on the federal level through USDA approved vendors, and all food is shipped to warehouses in only two states: Missouri and Idaho.[69] ITOs and state agencies who administer FDPIR locally then make orders from these warehouses, meaning that FDPIR products go through two major shipments before being transported a third time cross-nationally to its participants. Time and fuel may be cut from this process if products are grown, processed, stored, and purchased closer to the region of participants. Since being stewards of the environment is a common goal of many Indigenous food sovereignty activists, FDPIR should be motivated to reduce environmental exploitation with administering the program, which can be

[69] Mucioki, Megan, Jennifer Sowerwine, and Daniel Sarna-Wojcicki. "Thinking inside and Outside the Box: Local and National Considerations of the Food Distribution Program on Indian Reservations (FDPIR)." Elsevier. Journal of Rural Studies, December 6, 2017. https://reader.elsevier.com/reader/sd/pii/S0743016717304199.

supported by partnering with farms that are both local to the participants and Native owned. This will help reducing shipment mileage, decreases the amount of time and energy food is spent in refrigeration at warehouses, and promotes agroecological food production.[70] Similarly, with dependency, if local ITOs were involved in purchasing of foods, not only do they have the opportunity opt to buy locally, but from producers within the tribe, bolstering the financial stability and thus independence of Native communities. Indigenous food sovereignty activists, such as Winona LaDuke, often cite that their tribes are spending more than they would like on food grown outside their jurisdiction.[71] Allowing ITOs to purchase food locally will give tribes the opportunity to buy local and circulate money within their communities as well as increase reliability of food deliveries as products stay within a closer circle to recipients who ultimately receive them. This is another example of how increasing food sovereignty can also ameliorate and prevent issues in food insecurity.

Furthermore, given that FDPIR still situates itself as a supplementary food assistance program, yet many of its participants rely on its deliveries as their only source of food,[72] FDPIR must consider both making itself more reliable help to reduce dependency of their participants on the program. Due to the centralized quality of the program, the Food Distribution Program is exploiting environmental resources more than necessary as well as preventing Native

[70] Price, Mindy Jewell, Alex Latta, Andrew Spring, Jennifer Temmer, Carla Johnston, Lloyd Chicot, Jessica Jumbo, and Margaret Leishman. "Agroecology in the North: Centering Indigenous Food Sovereignty and Land Stewardship in Agriculture 'Frontiers.'" *Agriculture and Human Values*, 2022. https://doi.org/10.1007/s10460-022-10312-7.

[71] Hoover, Elizabeth. "'You Can't Say You're Sovereign If You Can't Feed Yourself.'" Essay. In *Indigenous Food Sovereignty in the United States: Restoring Cultural Knowledge, Protecting Environments, and Regaining Health*. Norman: University of Oklahoma Press, 2019.

[72] Pindus, Nancy, and Carol Hafford. "Food Security and Access to Healthy Foods in Indian Country: Learning from the Food Distribution Program on Indian Reservations." *Journal of Public Affairs* 19, no. 3 (2019). https://doi.org/10.1002/pa.1876.

communities from supporting their local economies, which remains a barrier to meeting the criteria of non-exploitation and fostering equality.

Public Health

The Food Distribution Program on Indian Reservations has been cited as providing the healthiest products and greatest selection of whole ingredients compared to other U.S. welfare food programs such as SNAP and WIC[73]. However, it not only fails to help combat common health issues faced by Native American communities such as obesity and Type II diabetes but may actually contribute more to worsening outcomes. In a study conducted by Melinda Smith et al., foods provided in FDPIR packages contained more low-quality carbohydrates than is recommended by the Dietary Guidelines for Americans. Low quality carbohydrates contain added sugars and contribute to a higher glycemic index, inflammation, elevated visceral adiposity, and insulin resistance – which can lead to diabetes and other issues, such as increased oxidating stress in postpartum women. Moreover, compared to complex carbohydrates which take longer to digest and are more satiating, low-quality carbohydrates have a lower satiety and can induce hunger and cravings more quickly. Because of this, on average, the participants of a sample study of those who were on FDPIR diets ate an average of 14% more calories than the control.[74]

[73] Byker Shanks, Carmen, Teresa Smith, Selena Ahmed, and Holly Hunts. "Assessing Foods Offered in the Food Distribution Program on Indian Reservations (FDPIR) Using the Healthy Eating Index 2010." Public health nutrition. U.S. National Library of Medicine, May 2016. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5439495/

[74] Smith, Melinda, Elizabeth Rink, Suzanne Held, Carmen Byker Shanks, and Mary P Miles. "The Effects of Foods Available through the Food Distribution Program on Indian Reservations (FDPIR) on Inflammation Response, Appetite and Energy Intake." *Public Health Nutrition* 24, no. 10 (2020): 3037–48. https://doi.org/10.1017/s1368980020002852.

Furthermore, other setbacks remain to the nutritional quality of the food packages – few of the foods come fresh, and due to long deliveries and delays, produce often arrives rotten and wilted. Many of the other ingredients delivered are frozen, dried, or preserved, which have a longer shelf life but can stunt nutritional value. Often, USDA replaces whole ingredients with these cheaper alternatives to cut costs, which can contain more sugars, salts or preservatives which decreases the quality of the food and can contribute to poor health outcomes. Because of this, fruit, grains, seafood and plant proteins, and fatty acids in delivery packages did not meet HEI-2010 scores for a healthy diet.[75]

Increasing fresh, whole foods and decreasing processed products in FDPIR packages is an important step in improving public health outcomes in Native American communities. While USDA makes a greater attempt at food quality with FDPIR than other food welfare programs, FDPIR foods still fall short of nutritional marks for a healthy diet. Due to attempts to cut costs and ease obstacles of long shipments, USDA swaps out fresh foods for processed ones, sacrificing the nutritional value of participants' diets for profit.[76] In order to meet the public health criteria of Indigenous food sovereignty, communities themselves, with different priorities than the government, must be involved in decision making at the local level. So long as the federal government oversees selecting program foods, FDPIR nutrition may not be able to achieve its highest potential for strengthening Indigenous public health.

[75] Byker Shanks, Carmen, Teresa Smith, Selena Ahmed, and Holly Hunts. "Assessing Foods Offered in the Food Distribution Program on Indian Reservations (FDPIR) Using the Healthy Eating Index 2010." Public health nutrition. U.S. National Library of Medicine, May 2016. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5439495/
[76] "Chapter 13 Food Distribution Program on Indian Reservations." Accessed January 29, 2022. https://www.ers.usda.gov/webdocs/publications/46556/30235_fanrr19-3m_002.pdf?v=0.

Sustainable Local Economies

The Food Distribution Program also lacks in its ability to contribute to a local economy and empower producers by centralizing the program through USDA. Centralization of growing and distributing food means longer deliveries and more uncertainties in transportation than if dispensed locally, which can explain the plethora of complaints of late and even missed deliveries by participants.[77] Considering many participants rely heavily or entirely on FDPIR, hyper centralization can contribute to food insecurity with greater distances and wait times from food deliveries. Tribes and state agencies are not involved in growing or purchasing of food, only overseeing at the local level, which prevents the chance to support local and Native farmers and employ more tribal members in administration. Even with the purchase of traditional foods for FDPIR deliveries, less than 25% are sourced from Native owned suppliers.[78]

In closing, FDPIR does not strengthen local economies as much as it could, as continues to situate itself as a supplementary assistance program as many recipients rely on it as their main source of food, which is an unsustainable economic model in consideration of dependency. Also, through centralizing most decision making through the Department for Agriculture and other federal ministries, FDPIR loses its opportunity to support local tribal economies and does not meet that criterion for food sovereignty.

[77] Mucioki, Megan, Jennifer Sowerwine, and Daniel Sarna-Wojcicki. "Thinking inside and Outside the Box: Local and National Considerations of the Food Distribution Program on Indian Reservations (FDPIR)." Elsevier. Journal of Rural Studies, December 6, 2017.

[78] Smith, Melinda, Elizabeth Rink, Suzanne Held, Carmen Byker Shanks, and Mary P Miles. "The Effects of Foods Available through the Food Distribution Program on Indian Reservations (FDPIR) on Inflammation Response, Appetite and Energy Intake." *Public Health Nutrition* 24, no. 10 (2020): 3037–48. https://doi.org/10.1017/s1368980020002852.

Consumer and Producer Choice

Participants of FDPIR have little decision making in the foods they eat. Choices are nearly obsolete, such as fresh versus frozen or which protein option they prefer.[79] Larger considerations that constitute true Indigenous food sovereignty, such as the choice to incorporate traditional foods, is mostly out of control by consumers. Other issues arise with consumer autonomy as well, such as a dependence on delivery times and being financially unable to buy groceries outside of the welfare program. Having consistent access to the foods of one's choice and being able to afford purchasing them is an important component of food sovereignty, and without independent governance by smaller groups such as tribes, FDPIR will give little choice to its consumers about the where, what, and when aspects of their diet.

FDPIR also faces roadblocks with empowering Native producers to be able to serve their own communities, which is a major underpinning in the fight for food sovereignty. Farmers and other producers also need to be able to make a livelihood out of agriculture and can make choices in the market in which they do business. To be eligible to supply foods to FDPIR participants, farmers and businesses must first become a certified vendor through USDA[80], which impedes the process with paperwork, testing and certifications and other forms of bureaucracy. Ultimately, while FDPIR is making attempts to give more freedom to its Native producers and consumers through increasing food choices and beginning to contract with Native

[79] Smith, Melinda, Elizabeth Rink, Suzanne Held, Carmen Byker Shanks, and Mary P Miles. "The Effects of Foods Available through the Food Distribution Program on Indian Reservations (FDPIR) on Inflammation Response, Appetite and Energy Intake." *Public Health Nutrition* 24, no. 10 (2020): 3037–48. https://doi.org/10.1017/s1368980020002852.

[80] Skolmowski, Julie, and Lindsay Walle. "Of Bison and Blue Cornmeal: USDA Supports Access to Traditional Foods in Native American Communities." | Agricultural Marketing Service. Agricultural Marketing Service, 2014. https://www.ams.usda.gov/blog-post/bison-and-blue-cornmeal-usda-supports-access-traditional-foods-native-american-communities.

suppliers, more focus could be placed on this area and FDPIR is not currently fulfilling the level choice and empowerment that is required of food sovereignty.

FDPIR in Attempts to Fulfil Indigenous Food Sovereignty

The five most stated goals for Indigenous food sovereignty are access to food systems that are culturally relevant, non-exploitive, healthy, economically sustainable, and choiceful for consumers and producers. FDPIR is making attempts to engage with all these criteria but meets the goals of none. FDPIR has begun to incorporate culturally relevant foods, but not enough and without nuance for distributing them to their communities of origin. They have also yet to focus purchasing power on locally owned food companies, which not only misses an opportunity to strengthen Native economies but leads to excess in cross country shipping of FDPIR foods, ultimately using more fuel and other resources than necessary. Regards for public health and consumer choice of FDPIR packages is seriously limited by the USDA's prioritization of cost cutting over nutritional value and diversity of foodstuffs. The common obstacle in reaching all five of these criteria is the hyper-centralization of the Food Distribution Program on Indian Reservations. Since the Department of Agriculture is the main administrator of the program and is responsible for purchasing food for the whole national program, they lose nuance in understanding the needs of participants on the regional, tribal, and individual level. Given this common theme, the Food Distribution Program currently does not fully meet any of the main five criteria for food sovereignty and will not reach them without restructuring the program.

Chapter 6: Institutional Reform of FDPIR

The Food Distribution Program on Indian Reservations has merely fulfilled in reaching the needs of marginal food security for Native American communities. Extreme food insecurity, poor nutrition, lack of cultural relevancy, lack of choice, and economic and environmental unsustainability remain roadblocks to achieving Indigenous food sovereignty. Considering several of these issues can be linked to the hyper-federalization of the program, decentralization and reallocation of power to regional administration should be at the forefront of institutional reform. FDPIR can begin to be reformed by stratify packages based on the needs of extremely food-insecure participants, reinstating the Vendor Pilot Program, this time with an adjusted budget, as well as with making a rigorous effort to incorporate traditional foods and source from Native-owned producers.

Stratification of Needs in FDPIR

In tandem with fulfilling goals of Indigenous food sovereignty, FDPIR still needs to improve food security among its most vulnerable participants. Without reaching the needs of food security, efforts to achieve food sovereignty for this vulnerable subgroup are somewhat futile, as those experiencing hunger and malnutrition will prioritize eating enough food over less but higher quality food. Therefore, while striving for food sovereignty, FDPIR must make reforms to meet high food security first.

For those who rely on welfare packages as their only source of nutrition, FDPIR must consider stratifying the program to include more food for certain participants. Extremely food

insecure participants, or 22% of FDPIR households[81], may benefit from a sliding scale system to receiving greater benefits than other participants who are more financially stable.

Decentralization Through Reinstating the Vendor Pilot Program

Regionalization of FDPIR can solve many roadblocks to achieving food sovereignty. Regionalization has already been tested with FDPIR through the Vendor Pilot Program (RVP) and can be reimplemented. RVP was designed by the Food and Nutrition Service (FNS) in 2012 and implemented in August 2013. It was discontinued in 2015 mainly due to USDA budget constraints but was nonetheless deemed overall successful by all parties involved.[82] In the Vendor Pilot Program, four ITOs – Chickasaw Nation, Pawnee Nation, the Sac and Fox Nation, and the Ponca Tribe – were chosen to participate with ordering from a contracted regional vendor, MDV. The participating ITOs said that through MDV, it was easier to order online for their participants, the warehouses had a greater selection and more foods in stock, and packaging was less recognizable as FDPIR products, which helped to decrease stigma among participants. Thus, this aspect of the pilot program maintained a higher fulfillment of the consumer choice criterion for food sovereignty than the regular administration of FDPIR. Participants also expressed more desirability and more attractive looking foods from the regional vendor than from USDA's typical procurement, which was a major hinderance to true food security indicated by participants from the Pindus et al. and Mucioki et al. studies.[83] Foods provided by the regional

[81] Pindus, Nancy, and Carol Hafford. "Food Security and Access to Healthy Foods in Indian Country: Learning from the Food Distribution Program on Indian Reservations." *Journal of Public Affairs* 19, no. 3 (2019). https://doi.org/10.1002/pa.1876.

[82] Chami, R., Geller, D., Gordon, E., Hafford, C., & Hillabrant, W. (2016). Food Distribution Program on Indian Reservations Regional Vendor Pilot Assessment. Prepared by Manhattan Strategy Group for the U.S. Department of Agriculture, Food and Nutrition Service (available online at www.fns.usda.gov/researchand-analysis).

[83] As per the USDA definitions of levels of food security, a lack of diversity, desirability, and attractiveness of foods, even if enough food is available, is what categorizes marginal food security.

vendor also were able to be delivered quicker, stay fresher, and had further out expiration dates, stabilizing household food security further.[84] While they were overall satisfied with the initial run, participating ITOs said the Vendor Pilot Program could be improved by incorporating more traditional Native foods to the regions they operated in (in the case of where the test program took place, this would mean the Oklahoma/Lower Midwest area). To address the issue of extra expenses, ITOs stated that they would have liked to work directly with FNS to reduce external costs of the program.

When providing feedback about the experience from the vendor side, MDV stated that they wished they could speak more to ITOs before the project began to hash out details regarding receiving orders, offloading and inventory.[85] The original USDA-administered Food Distribution Program costs a monthly average of $57 per participant, while the Vendor Pilot Project cost $71. USDA chose to discontinue the program in March 2015 mainly because of the 24% cost increase, and partially because of lack of control over typical USDA guidelines through regional vendors, such as the difficulty with MDV in ensuring that all ingredients were sourced from domestic origin.[86]

Given that budgetary constraints were the greatest hindrance to continuing the program, the most efficient way to decentralize FDPIR is to reinstate the Vendor Pilot Program with some alterations. The framework to regionalize is already available, and RVP satisfied and empowered all the necessary groups: consumers (FDPIR participants), distributors (ITOS and SAs), and producers (local vendors). It also supported local providers - fulfilling the food sovereignty goals

[84] Chami, R., Geller, D., Gordon, E., Hafford, C., & Hillabrant, W. (2016). Food Distribution Program on Indian Reservations Regional Vendor Pilot Assessment. Prepared by Manhattan Strategy Group for the U.S. Department of Agriculture, Food and Nutrition Service (available online at www.fns.usda.gov/researchand-analysis).
[85] ibid, pg.11.
[86] ibid, pg. 12.

of both consumer/producer choice and contributing to sustainable local economies. With financial limitations at play, ITOs may be able to procure funds for the difference in costs with the help of fundraising from local nonprofits. Considering FDPIR serves approximately 90,000 participants a year nationally[87], and RVP costs an extra of $168 per participant per year (a difference of $14 a month x 12 months), FDPIR would need to raise a collective 15.12 million USD annually to complement the regular USDA budget for FDPIR. Increasing the federal budget for FDPIR slightly should be considered, since FDPIR's 2022 budget was only $162 million USD out of the 96 billion USD annual federal budget for food welfare. FDPIR sits at 0.15% of this budget accordingly, while other programs, such as SNAP, accounts for 67.6% of this total budget. FDPIR deserves more funding in relation to other programs, considering how many participants it serves. In addition to budget increases for FDPIR, some of these costs can be cut prior. As stated in the Vendor Pilot Program ex-post evaluation, involved ITOs were willing to work with FNS to reduce some of these costs. Also, if regionalized ITOs, state agencies, and USDA can also work to procure extra funds at the smaller scale through partnerships with local nonprofits across the country for donations. State and federal taxes may also be reformed to support this. Ultimately, by making some alterations to RVP budgets, it is within the realm of possibility to reinstate and grow the Vendor Pilot Program to include more regional administrators and reach all FDPIR participants. Reinstalment of regionalization in FDPIR can contribute to local economies and better meet Indigenous food sovereignty.

[87] "FDPIR Program Fact Sheet." FDPIR Program Fact Sheet | Food and Nutrition Service, January 1, 2018. https://www.fns.usda.gov/fdpir/fdpir-fact-sheet.

Traditional Foods in RVP

The other cited difficulty in the pilot program was reaching the "100% domestically sourced" requirement for USDA vendors. Regional distributors may opt to outsource certain ingredients because of the cost and labor associated with domestic production. For the sake of meeting the goals of both distributors and consumers, distributors may be able to swap out this percentage of foreign-grown foods for local traditional foods, which have been shown to grow easier and with less expense in their region of origin.[88] For the procurement of such traditional foods, regional distributors have the opportunity to source from local Native growers. By doing this, FDPIR can incorporate foods that are grown not only in the U.S., but regionally, and thus exceed the requirement for domestically grown USDA approved foods. Moreover, sourcing traditional foods from nearby Native growers satisfies the cultural relevance and sustainable economy requirements for Indigenous food sovereignty.

FDPIR can be institutionally reformed by instituting a sliding scale for its least secure participants and decentralizing the program with the old RVP framework as a basis, which was more successful at meeting choice, sustainability, and non-exploitation criteria. Incorporating more traditional foods and sourcing them from Native local producers can also get closer to meeting the other criteria: cultural relevancy, local economy, and public health. In order to reinstate regionalization, FDPIR budget should be increased, partner with charitable organizations to provide extra funds, and allow ITOs to decide where to cut costs.

[88] Batal, Malek, Hing Man Chan, Karen Fediuk, Amy Ing, Peter Berti, Tonio Sadik, and Louise Johnson-Down. "Importance of the Traditional Food Systems for First Nations Adults Living on Reserves in Canada." *Canadian Journal of Public Health* 112, no. S1 (June 28, 2021): 20–28. https://doi.org/10.17269/s41997-020-00353-y.

Chapter 7: Conclusion

The Food Distribution Program on Indian Reservations is a widespread food welfare program with the goal of providing food security in Native American communities. While it has been regarded as successful in promoting food security on a large scale and incorporating more aspects of education and wholistic nutrition than other food welfare programs, FDPIR stagnates in its protection of food rights at basic food security. Participants of the program and Indigenous activists wish to see greater levels of food security and food sovereignty in this program. Given FDPIR's national reach at serving nearly 100,000 Native American participants and its historic flexibility in making alterations, it is a suitable framework to institutionalize principles of Indigenous food sovereignty.

In order to analyze the ways in which FDPIR can be reformed to reach this goal, I evaluate the program against five of the most cited criteria of food sovereignty: cultural relevancy, ability to improve health outcomes, contribution to a sustainable economy, non-exploitation, and promotion of consumer and producer choice.

Ultimately, I find that while FDPIR has made attempts to engage with all of these criteria, further proving its potential for growth, the highly centralized quality of its administration and lack of meeting high food security first keeps FDPIR from making tangible strides in any of these areas. Attempts to incorporate traditional foods have been without nuance to their communities of origin, the program has yet to expand its partnerships with Native-owned food producers and distributors, nutrition has been sacrificed to cut costs, and purchasing and shipping products happens slowly and somewhat inefficiently at the national level. Moreover, these attempts are ineffective for nearly a quarter of its participants who are extremely food insecure, as they are forced to prioritize having enough caloric intake over anything else first.

This being said, I have three major recommendations for reforming FDPIR: first, the program should stratify packages on a sliding scale based on financial status to increase food security for its most vulnerable participants. This may help create equity in the program and solve extreme food insecurity.

Secondly, FDPIR must be decentralized. The best way to do so is to modify and reinstate a discontinued regionalization program, the Vendor Pilot Project. RVP was found to be satisfactory by participating ITOs, vendors, and consumers for having better ground level communication, better and more diverse foodstuffs, and a general higher efficiency than the regular federal administration. Mainly, it was discontinued for budgetary constraints, which should be supplemented by nonprofit fundraising, increased budget for FDPIR, and cost cutting decisions that are made from the ITO end to support tribal sovereignty. Regionalization through RVP made FDPIR closer to meeting the criterions of consumer choice, non-exploitation, and sustainable local economies than the original model.

Thirdly, FDPIR must work diligently to increase traditional foods in its packages and source these foods from local, Native growers. Doing so will help increase the cultural relevance of participants' diets, restore nutritional imbalances, and support local Native entrepreneurs.

In conclusion, the Food Distribution Program on Indian Reservations has great potential to enact Indigenous food sovereignty with a few simple reforms, but it must listen to the needs of its participants and voices of Indigenous activism to do so.

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