



An Intersectionality-Based Policy Analysis Examining the Complexities of Access to Wild Game and Fish for Urban Indigenous Women in Northwestern Ontario

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Phillipps B, Skinner K, Parker B and Neufeld HT (2022) An Intersectionality-Based Policy Analysis Examining the Complexities of Access to Wild Game and Fish for Urban Indigenous Women in Northwestern Ontario. Front. Commun. 6:762083. doi: 10.3389/fcomm.2021.762083 The destruction of Indigenous food systems is a direct consequence of the settler-colonial project within Canada and has led to decreasing access to Indigenous foods, disproportionate rates of food insecurity and disconnection from Indigenous food systems and environments. We interviewed Indigenous women, non-Indigenous staff of Indigenous-serving organizations, and policymakers (i.e., those who develop, interpret, or implement wild food policy) to explore how the policy context has impacted Indigenous women and their communities' experiences of accessing Indigenous foods in urban northwestern Ontario. We applied an Intersectionality-Based Policy Analysis (IBPA) Framework to shape our research questions and guide the thematic analysis of the data. We found that stakeholder groups had differing understandings of the issue of accessing wild foods and Indigenous food security and their actions either supported or disrupted efforts for access to wild food to promote food security or Indigenous Food Sovereignty. Policymakers cited necessary barriers to promote food safety and support conservation of wildlife. Staff of Indigenous-serving organizations approached the issue with consideration of both Western and Indigenous worldviews, while Indigenous women spoke about the ongoing impacts of colonial policy and government control over their lands and territories. The main policy areas discussed included residential school policy, food regulation, and natural resource regulation. We also investigated community-level strategies for improvement, such as a wild game license. Throughout, we tied the colonial control over 'wildlife' and the Western food safety discourse, with infringements on Indigenous Food Sovereignty, experiences of racism in food settings and on the land, as well as with broad control over Indigenous sovereignty in Ontario. This work contributes to an increased understanding of how Western discourses about health, food, and the environment are perpetuated through systemic racism in government policy and reiterated through policymakers' views and interpretations or actions. Government institutions must develop culturally safe partnerships with Indigenous leaders and organizations to facilitate a transfer of power that can support Indigenous Food Sovereignty.

Keywords: Intersectionality-Based Policy Analysis, Indigenous Food Sovereignty, Wild Game, Indigenous Food Security, Northwestern Ontario

1 INTRODUCTION

Internationally, food insecurity is a question of gender justice as women are the most likely to be food insecure, least likely to own the means to produce food, and the most disadvantaged by food systems governance locally and internationally (BRIDGE, 2015; Carney, 2015; Brody, 2016; Pictou et al., 2021). In Canada, patriarchy and colonialism work to oppress Indigenous women, and are experienced through the dispossession of land, loss of Indigenous Food Sovereignty (IFS) and disproportionate food insecurity (Mintz, 2019; Pictou et al., 2021). Poverty, violence, lack of safe housing, and food insecurity are some of the realities for Indigenous women, girls, and 2SLGBTQQIA+1 people in Canada and Indigenous Peoples in urban centers experience greater health inequities than those who live on reserve (National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019). These disparities are rooted powerfully in experiences of colonialism, specifically in gendered policies that affected profound social and cultural disruption in Indigenous Peoples lives (Neufeld, Richmond, and The Southwest Ontario Aboriginal Health Access Centre, 2020).

IFS respects struggles for self-determination within Canada, where food has been used as a tool of ongoing settler colonialization (Burnett et al., 2016; Martens et al., 2016). Policy is a pillar of IFS because oppressive land, water, food, economic, and environmental policies prohibit the landbased practices necessary to enact food sovereignty (Morrison, 2011; Morrison, 2020). Specifically, the degradation of IFS and construction of food insecurity is a function of Canadian settler-colonialism. Throughout history, Canada has inhibited Indigenous Peoples' ability to hunt, fish, forage, and farm in a multitude of political ways including resource extraction, creations of national parks, prioritizing sport hunting and tourism and limiting of how wildlife is shared or sold (Teillet, 2005; Burnett et al., 2016; Mintz, 2019). Now, many Indigenous Peoples face declining access to harvesting territories and waters as well as a decline in the availability of nutritious wildlife or plants, directly causing a reliance on store-bought foods (Morrison, 2020). When understood from a critical population health approach, this environmental dispossession creates situations which perpetuate basic health and social needs being unmet (e.g., employment, food security) as result of colonial sociohistorical context and policies (Richmond and Ross, 2009). Indigenous Peoples have always disputed dispossession (Richmond and Ross, 2009) by fighting politically, by petition, by occupation, and in the courts (Teillet, 2005). Collaborative networks of Indigenous groups and Indigenous-serving organizations have been formed for knowledge mobilization, advocacy and action towards improving food security and IFS (Levkoe et al., 2021).

There is currently a shortage of legal work surrounding food security and food sovereignty in Canada (Settee, 2020), but in particular for Indigenous Peoples living off-reserve whom are required by provincial law to follow the same procedures as non-Indigenous populations when hunting or fishing despite their constitutionally-protected Indigenous and/or Treaty rights (Ermine et al., 2020). It is known that Indigenous harvesting is regulated in Canada through Treaty Rights, Aboriginal Rights,² and provincial regulation (Ermine et al., 2020), but how these policies are experienced in various urban regions across provinces within Canada and by Indigenous Peoples who have various levels of recognition by the federal government (i.e., Status Indian, Non-Status, Inuit, or Métis) is poorly understood and undocumented. Herein we apply an Intersectionality-Based Policy Analysis Framework (IBPA) to explore how the provincial and federal policy contexts have historically, and continues to impact Indigenous women and their communities' experiences of accessing wild foods³ in urban northwestern Ontario. Using an intersectional analysis "can help researchers to build common ground between Indigenous and Western worldviews, by examining how power works on both sides" (Stinson, 2018, p. 1) and enables the linkage of these two worldviews (Levac et al., 2018). This analysis was borne from questions regarding wild food policy from community organizations during previous research in both cities. Community organizations wanted more clarity on the interpretation of and practical application for provincial policies related to game and fish. Highlighting Indigenous women's experiences brings forth the "everyday decolonization and resurgence practices" of Indigenous Peoples which keep a continued focus on the revitalization of the well-being of their Indigenous communities by focusing on (re)localized and communitycentered actions (Corntassel, 2012, p. 97).

¹This acronym refers to people who identify as Two Spirit, lesbian, gay, bisexual, transgender, queer, questioning, intersex and/or asexual (Department of Justice, 2021).

²The Indian Act is federal legislation that codifies who is eligible for Indian Status as defined by the Canadian state. Status provides certain rights and benefits which are unavailable to non-status First Nations, Métis, or Inuit individuals (Government of Canada, 2021). Since treaties cover much of the land now considered Canada, those who have Treaty Rights as per their status within a First Nation, can legally harvest wildlife in their treaty territory (Government of Saskatchewan, 2018; Ermine et al., 2020). Inuit, Non-status, and Métis people also have legally protected Aboriginal Rights as per the Constitution Act of 1982 but generally do not have the same rights to hunting and fishing because they cannot use treaty territory and the state can infringe on these rights "if there is a valid legislative objective and the infringement is consistent with the honour of the Crown" (Ermine et al., 2020, p. 12). ³In this work we use the term wild foods to encompass non-farm raised meat or fish that are harvested from the natural environment through fishing, hunting, or trapping which are part of broader Indigenous or traditional food systems. We focus on this subset of foods, and in particular game and fish, because of their contention in the policy arena. We use the term wild foods throughout as this word is the language used in policy to differentiate meat that has not been inspected in a federally licensed facility. We do however acknowledge that the use of "wild" to describe these foods can be problematic in perpetuating barriers to their consumption. Further, there are many other foods which can be considered traditional or Indigenous that are outside of the scope of this analysis.

2 THEORETICAL FRAMEWORK: INTERSECTIONALITY-BASED POLICY ANALYSIS

Public policy discussions center on what governments "ought or ought not" to do about public health issues (Hankivsky et al., 2012) which involves non-overt and opaque processes that are hidden to the public (Walt et al., 2008). The IBPA⁴ advances current Canadian best practices in understanding the policy implications for diverse groups (including sex and gender-based analyses and health equity or health impact assessments) by fostering understanding of the multi-level and dynamic social locations that shape individual and collective experiences as these occur through structural conditions and power structures (Hankivsky et al., 2012; Hankivsky and Jordan-Zachery, 2019). Moreover, through intersectional analyses we can explore how oppression is ordered and preserved through social differences, such as gender, race, social class and other aspects of identity (Kanenberg et al., 2019; Parker et al., 2019), as well as the complex system through which policies are developed, communicated, and interpreted. Indigenous women whose material experience of accessing wild food is constructed according to their unique but shared identities based around race, gender, geographic location, place, urbanicity, and ties to traditional practices and lands. IBPA allows for understanding the fluidity and fluctuations of identities shaped by socio-historical conditions and social structures such as settler-colonialism, racism and sexism to get at the deeper and more contextual meanings of Indigenous women's individual and group experiences, needs, and strategic resistance to the existing policy while proposing policy solutions (Bensimon, 2003; Hankivsky et al., 2012; Hankivsky and Jordan-Zachery, 2019).

The authors come to this work as white settler women, and would like to acknowledge our positionality, including the fields from which we approach this work. The first author designed and completed this analysis as a graduate student in public health in the south of Ontario, as part of their larger thesis work surrounding accessing Indigenous foods in Thunder Bay and Sioux Lookout. The following two authors have combined 30 + years of experience working on food-based research with Indigenous Peoples and living in northwestern Ontario. These authors guided the conduct of the study, and recruitment for participation in this study was based on existing working relationships. Additionally, the last author brings their experience of 20 years, working with First Nations women on revitalization of Indigenous food systems in southern Ontario and Manitoba.

3 MATERIALS AND METHODS

We use an IBPA approach to interrogate the connections between the context of Indigenous Peoples lives in urban northwestern Ontario, and processes of food and natural resource policy development; including how problems of Indigenous Peoples' access to wild food and food insecurity are defined and the underlying assumptions about Indigenous Peoples and Western ideologies that are present in policies and through implementation contribute to health inequities (Fridkin, 2012). We pay particular attention to the policy values and rationale described by those who enact it (Hankivsky & Jordan-Zachery, 2019). The questions examined have been adapted from the IBPA Framework's list of 12 overarching questions and guide our analysis (Hankivsky et al., 2012), and include: 1) How is the policy "problem" of accessing wild food and food insecurity for urban Indigenous populations defined by stakeholders? 2) How does the current policy landscape address, maintain, or create inequities between different Indigenous people or groups? (2b) What assumptions regarding Indigenous Peoples, Indigenous foods, and harvesting practices underlie current policies that impact access to game and fish for urban Indigenous populations? 3) Where are the policy gaps and are there interventions to improve the problem?

From 2017 to 2020, as part of a larger research project, we completed in-depth, open-ended interviews with 18 participants living in either Thunder Bay (n = 15) or Sioux Lookout (n = 3), two urban hubs in northwestern Ontario.⁵ Participants were categorized into three stakeholder groups to build a sample of multiple relevant actors: self-identified female Indigenous community members (n = 6) (i.e., those who currently access game and fish, desire to access more, or who are food activists), non-Indigenous staff of Indigenous-serving organizations (n = 6) (i.e., community organizations with services related to food), and policymakers (n = 5) (i.e., those who either create, implement, or interpret policy related to wild food).⁶ We acknowledge individuals can shift between groups based on their complex

⁴The IBPA is based on the 8 guiding principles of intersecting categories, multilevel analysis, power, reflexivity, time and space, diverse knowledges, social justice, and equity. These principles inform the 12 IBPA questions which can be adapted to suit the context of their application (Hankivsky et al., 2012).

⁵Thunder Bay is a regional service center situated on the north shore of Lake Superior on the lands of the Anishinaabe and Fort William First Nation (Fort William First Nation, n.d.). In 2016, the population of 121, 621 made it is the largest city in Northwestern Ontario and 12.7% of the population identified as Indigenous (the largest populations reported ancestry as Cree, Ojibway, First Nations ancestry and Métis) (Statistics Canada, 2017b; 2018b). Sioux Lookout is a town 350 km northwest of Thunder Bay on the lands of the Anishinaabe of Lac Seul First Nation, signatory of Treaty 3 in 1873(Lac Seul First Nation, 2019). This is the essential service center for at least 30, 000 people living in the rural and remote far northwest of Ontario (including 29 First Nations communities) (Municipality of Sioux Lookout, 2014). In 2016, 37.6% of the 5, 272 population identified as Indigenous (the largest populations reported ancestry as Ojibway, First Nations ancestry, Oji-Cree, Cree, and Métis) (Statistics Canada, 2017a; 2018a).

⁶We interviewed individuals who worked at various institutions including public health units, community organizations, the Ontario Ministry of Natural Resources (MNR), and the Ontario Ministry of Food, Agriculture, and Rural Affairs (OMAFRA). Individuals were selected for their experiences and roles in these organizations but did not speak on behalf of them. Three of the individuals interviewed in Thunder Bay worked for organizations which also serve or govern in Sioux Lookout. All stakeholders are categorized into groups based on the way they described their role and their interactions with Indigenous populations in their roles. To layer confidentiality, when quoting an individual we refer to them by stakeholder group using gender-neutral names and pronouns. The Indigenous participants self-identified as women and some have chosen to be identified by their real names.

identities and multiplicity of roles in these communities.⁷ The Indigenous women who spoke with us hold a variety of Indigenous identities, including Anishinaabe, Cree and Inuk, with connections to First Nations and Inuit communities in northern Ontario and Nunavut.

Using the snowball sampling technique, the sample was expanded to others who were information-rich cases (Patton, 1990). In-depth interviews from 1 to 3 h occurred either in person or through video conferencing software. Participants gave verbal or written consent and interviews were audio-recorded and then transcribed prior to analysis. Interview guides provided a bank of potential questions according to the stakeholder group. In-depth open interviews were used to prioritize the lived and practical knowledge of participants in a format that allows for a complex exploration of the topic area in a co-learning environment (Lincoln and Guba, 2000). The conversational style is an important part of building research relationships and allowing for the interviewee to bring forth what is most relevant to their position in this policy ecosystem (Patton, 2014). These interviews were preliminarily coded using inductive and descriptive codes to capture the thoughts of participants in their own words. Through the iterative process of thematic analysis (Braun and Clarke, 2006, 2012), the theoretical framework of IBPA (Hankivsky et al., 2012; Hankivsky et al., 2014) was introduced retrospectively. The first author used the adapted research questions (as listed above) as guides to organize a second round of interpretive coding responding to the research questions. Themes and sub-themes were revised repeatedly throughout the analysis and writing process. In what follows below, we lay out the thematic findings of the IBPA analysis.

4 FINDINGS

The results are organized by theme and subtheme (where applicable) in response to the three research questions and are numbered accordingly (See **Table 1**). Question 2b is considered under the umbrella of the second question because these assumptions contribute to inequities. A temporal aspect (i.e., change over time) was considered throughout the analysis as interviews occurred over 3 years.

4.1 Stakeholders' Understandings of the Policy Problem of Accessing Wild Foods and Food Security

This section lists and summarizes stakeholder viewpoints that are expanded upon in greater detail throughout this work. Thematic findings are delineated by each of the three stakeholder groups below to respond to research question one—which is focusing on the differences in stakeholder understanding of the policy problem of access to game and fish as a means to support food security for urban Indigenous People in northwestern Ontario. We found differences in problem definition across and within stakeholder groups.

4.1.1 Perspectives of Policymakers

For policymakers, the general sub-themes describing their framing of the problem were 1) food safety concerns with wild food, 2) preventing the commercialization of wild food, 3) case law definitions of Indigenous harvesting rights, and 4) administrative barriers to deterring consumption of wild game, for sake of conservation concerns. For example, a participant who implements policy focused on the importance of respect for treaty boundaries and the court-system when discussing increased consumption of game by Indigenous Peoples. Aiden explained the risk of being criminally charged for harvesting outside one's treaty area:

"In theory, someone could be charged for harvesting outside of their Treaty area. Because the current understanding, based on case law, supports inner-Treaty harvesting. [...] Yeah, so a lot of our directions are around case law."—Aiden, policymaker.

Another policymaker considered urban off-reserve access to wild game as a "minor issue" and described hunting as very accessible in northern Ontario. They chose to emphasize concern with wild game as a food source because it is not inspected in a federally licensed facility therefore it should not be shared with others. As sharing is a cultural food practice for many Indigenous Peoples, this tension is significant. They explain further that the policy will not be changed however, without stronger political advocacy on the topic, stating:

"There's *no inspection.*⁸ And that's why hunted game is considered consumer-owned, [...] completely controlled by the consumer, and it only is allowed to legally be distributed within their *immediate* family –Technically you're not even supposed to give it away."—Taylor, policymaker

Public health inspectors centered the issue of food safety and reducing commercialization of wild game as the reasons why policy must be in place restricting harvesting, even if it limits some access for Indigenous populations. For example, one of the inspectors, Alex said:

"The purpose is to say, look, there's some principles here that are going to protect you and your patrons. With the Food Premises regulation, it may look picky, like keeping paperwork and tickets and posters and all this kind of stuff, but the point is to keep people safe. You're talking about uninspected meat, right? [...] Yeah, it's a huge pain for someone who wants to do that. But *why* do we do it? We do it because we're talking about uninspected meat. And it's also not carefully, how it's transported and everything else is not really very

⁷For example, many of the Indigenous community members we interviewed are also active in organizations that serve Indigenous Peoples.

⁸In quotations, italics are used to demonstrate words or phrases where the participants placed an emphasis.

TABLE 1 | Summary of findings: Themes and subthemes by research question.

(1) Stakeholders' Understandings of the Policy Problem of Accessing Wild Foods and Food Security

	Theme: Perspectives of policymakers			
	Food safety concerns with wild meat	Preventing the commercialization of game	Case law definitions of Indigenous harvesting rights	Administrative barriers to deterring consumption of wild meat
	Theme: Perspectives of Non-Indigenous Staff from Indigenous-Serving Organizations			
	Comprehend and value both Navigate complex Poverty as a determinant of food insecurity Indigenous and Western regulations and find Poverty as a determinant of food insecurity worldviews loopholes to serve wild meat Poverty as a determinant of food insecurity		nsecurity	
	Theme: Perspectives of Female Indigenous Community Members			
	Residential schools de- skilling and stigmatizing Indigenous foods	Issue of sovereignty—government controlling their harvesting and consumption of wild foods in colonial systems	Environmental management and food premise policy do not respect Indigenous Rights	Poverty as a driver of food insecurity and the inability to afford to harvest
(2) Inequi	ities in Food Insecurity and Access	to Wild Foods: The current policy land	Iscape in Ontario	
	Theme: Assumptions about Indigenous Peoples, Indigenous foods, and harvesting			
	Racialization of Indigenous Wild Meat - in regulation and in society			
	Theme: Policy Areas and their Impact			
	Intergenerational Impacts of Residential School Policy on women's families and food practices	Food Regulation—"no food sovereignty within food safety."	Natural Resources Regulation—arbitrary treaty boundaries and colonia control of wildlife and Indigenous bodies	

(3) Policy Gaps and Entry Points for Improvement

Theme: Permanent Wild Game License

Theme: Indigenous Led and Culturally Safe Collaborations Towards Indigenous Food Sovereignty

carefully controlled. [...] You actually *want* to have a hurdle for people to jump over. [...] Like, do you *really* want to do this? Like, it shouldn't be the easiest thing in the world to have a wild game dinner. Why? Because there's not that many moose left. Hence, why MNR doesn't want it commercialized."—Alex, policymaker

Public health inspectors shared the intense worry about any form of selling wild game, in restaurants or otherwise. While the inspectors were receptive to working with organizations to serve wild game, they are at the mercy of provincial regulations even with Indigenous-led organizations.

4.1.2 Perspectives of Non-Indigenous Staff From Indigenous-Serving Organizations

Non-Indigenous staff of Indigenous-serving organizations defined the problem of access to Indigenous foods in urban settings *via* the following sub-themes 1) an ability to comprehend and value both Indigenous and Western worldviews, 2) the necessity to navigate complex regulations and find loopholes to serve game to Indigenous Peoples in the city, and 3) poverty as a determinant of food insecurity.

The public health nutritionists interviewed recognized the conflict in adherence to Western food safety standards and promotion of Indigenous foods such as wild game, which impedes access in the cities. Emerson discussed the need to be more flexible in the regulation of wild game to serve community needs:

"That's part of the whole discussion right? Is what's the processes and who's really the regulating authority? Like the health unit they look after the consumption but then the MNR they're kind of concerned about you know the meat that's coming off land and not being—or not being inspected right? So it's everybody working together just to make it simplified and not be so strict on everything right? Got to kind of loosen up the rules a little bit just to kind of allow—especially now we've got more people coming from the remote communities into Thunder Bay. We need to you know, we need to evolve with that and they're living that, and they're relying on services and you know we need to evolve with that demographic change."—Emerson, non-Indigenous staff of Indigenous-serving organization. When asked about reasons for Indigenous Peoples' food insecurity, a non-Indigenous staff of an Indigenous-serving organization in Sioux Lookout spoke about the situation of their clients:

"Social welfare does not provide enough money [for all needs] and we have seniors that come over here, and they just can't make it stretch. They just can't do it, and it's not because they're mis-using whatever funds they have. [...] And so it's really difficult. I think most of the people we see are on social assistance. You see a few younger guys that have work, but they're working at minimum wage, and housing costs in this town There is no housing, so they can charge whatever they want, almost. Subsidized housing, there is, you know, a minimum number of units and its all for family. One of our guys, he was on the list for ten years before he got his apartment."—Reese, non-Indigenous staff of Indigenous-serving organization

This perspective highlights how food cost is one of the basic needs which their clients experiencing poverty are trying to balance. The local housing crisis and insufficient social assistance are drivers of food insecurity for Indigenous Peoples and others living in situations of poverty in Sioux Lookout.

4.1.3 Perspectives of Indigenous Community Members

Indigenous women highlighted that their communities' access to wild food centered on the core sub-themes of 1) residential schools de-skilling and stigmatizing Indigenous foods, 2) the issue of sovereignty—government controlling their harvesting and consumption of wild foods in colonial systems, 3) how environmental management and food premise policy do not respect Inherent rights as Indigenous Peoples, and 4) that poverty is a driver of food insecurity and the inability to afford to harvest. Laurie spoke about her class privilege and her harvesting skills which facilitated her access to wild foods. She also commented on the way she shares with family and other community members:

"Well I'm in a situation where I'm very fortunate to have like it's 2 hours away, you know, I have a vehicle, I have access to being able to purchase a trailer to stay out there. Not everyone is fortunate like that, but I am. And because I can do that I'm able to share that food that I have with people that aren't able to access it."—Laurie, Cree woman residing in Thunder Bay.

She also notes the challenges of accessing wild foods for Indigenous populations in urban Thunder Bay who may not have financial means to travel to harvesting territory or may not have a skilled harvester in the home:

"[They cannot access the meat] unless they have relatives giving it to them as well. Unless they have a vehicle. Unless they have money for gas, you know you can't just walk out and go harvest from Thunder Bay. And smaller towns, rural towns you could walk out not far and be surrounded by the bush."—Laurie, Cree woman residing in Thunder Bay.

Equally, another participant Samantha noted that in Thunder Bay, wild game has become increasingly policed by the health unit in comparison to ten to 15 years ago.

4.2 Inequities in Food Insecurity and Access to Wild Foods: The Current Policy Landscape in Ontario

4.2.1 Assumptions About Indigenous Peoples, Indigenous Foods, and Harvesting

The policies commonly referred to by participants in all stakeholder groups were the Ontario Ministry of Agriculture, Food, and Rural Affair's Food Safety and Quality Act (which houses meat regulations), the Ontario Ministry of Health and Long-term Care's Health Protections and Promotions Act (which houses Food Premise regulations) and the Ontario Ministry of Natural Resources and Forestry's Fishing and Wildlife Conservation Act (which houses regulations surrounding hunting, fishing, trapping-and the possession, buying, and selling of wildlife) (Fish and Wildlife Conservation Act, 1997, S.O. 1997, c. 41, 2020; Food Safety and Quality Act, 2001, S.O. 2001, c. 20, 2019; Health Protection and Promotion Act, R.S.O. 1990, c. H.7, 2020). These Acts, along with the Indian Act (Indian Act R.S. C., 1985), dictate who can harvest which wild game (including the time of year, the need for a license, and which lands they can use) as well as how wild food is shared or sold, including within food premises across the province. When our participants in all stakeholder groups discussed these acts, it was clear that certain Western values (i.e. food safety, "health," conservation, natural resource management) underlie their purpose and are in conflict with Indigenous worldviews. Further deep-rooted often racist assumptions about Indigenous Peoples, their foods, and their sovereignty in accessing those foods (i.e., restriction of land-use according to colonial boundaries and laws) rationalize the current state of policy. The meat regulations and food premise regulations were found to be based on similar values of Western environmental health' or food safety principles and logic (as opposed to IFS), and thus are discussed together and referred to as "food regulation" where appropriate.

We found that it is key to consider how living in an urban offreserve setting impacts the ability to enact Treaty or Indigenous Rights surrounding harvesting. A staff of an Indigenous-serving organization commented:

"On reserve my understanding is that there is no provincial jurisdiction or legislation [...] They have their own kind of [Indigenous] governance, whereas in urban settings there is still that component of –the provincial regulations still exist. So we can talk a little bit about that, the tensions that might be there—how, at the same time at the Indigenous level, they have an agreement with the federal government, but then it's provincial regulations that kind of are the barriers that are holding them back. [...] Provincial regulations say it's up to the health unit to kind of determine what's appropriate [...] But I would say the health unit is more of the interpreter and also the implementer if they choose to do so."—Blake, non-Indigenous staff of Indigenous-serving organization

Despite long-standing jurisdictional complexities, since the Constitution Act of 1982, wildlife has been assumed to be a provincial matter. Equally, while the health of the non-Indigenous population is the responsibility of the province, it is the federal government's responsibility to protect the health of Indigenous Peoples (Judge et al., 2020). Thus, in practice, urban Indigenous Peoples and the staff of organizations, which serve them, as demonstrated in our study, are left with the struggle of understanding and navigating the blurred lines of jurisdiction over wild foods. There is an intricacy of applying laws that govern wild food, as it is at times considered wildlife and at other times considered food. Consequently, accessing wild food implicates multiple ministries in Ontario. The policymakers we spoke with were not overly concerned about the impacts of the bureaucratic ambiguities in this policy area while Indigenous participants highlighted the impacts of these policies contribute to the structural violence enacted on their communities by the Canadian state.9

4.2.1.1 Racialization of Wild Game—in Regulation and in Society

We found that Western food safety policy has stigmatized and created barriers to wild foods that are known to have deep intrinsic value to Indigenous Peoples, contributing to their mental and physical health, spirituality, cultural identity, and nutrition (Martin, 2012; Robin and Cidro, 2020). The staff of Indigenous-serving organizations and Indigenous women linked negative stereotypes and anti-Indigenous racism which manifested through concerns over foods and food practices that are associated with Indigenous Peoples. A staff of Indigenous-serving organization in Thunder Bay elaborated:

"Indigenous neighborhoods within the urban setting ... lot of times, they'd be characterized as, like, for lack of a better word, the slums, poverty, low income. [...] Just that racial description of it already has a negative impact, that then kind of sets a foundation for other things, like accessing wild game, right. Like, oh, it's different, it's separate, it might be risky. I think that's a huge part of it."—Blake, non-Indigenous staff of Indigenous-serving organization. Laurie re-iterated how in cooking wild game at different venues throughout Thunder Bay, she repeatedly felt stigmatized:

"I just don't like the fact that it's, stigmatized as being dirty you know? [...] I feel like a dirty Indian cooking wild meat. I don't like that feeling. We have to be inspected, but every other meat in a grocery store doesn't? They're pumped full of antibiotics and [...] hormones and yet that's ok and wild meat is not. There's something wrong. It is very undignifying."—Laurie, Cree woman residing in Thunder Bay

These racially motivated assumptions about Indigenous foods are important to understand how in practice, wild game is overregulated and over-monitored in community organizations, while market foods are not. A staff of an Indigenous-serving organization underlined that the association of wild game with Indigeneity results in structural discrimination by targeting surveillance of wild game while often ignoring other obvious food safety risks. This fact perpetuates inequities for Indigenous Peoples, who are often structurally vulnerable because of their social positioning (Carney, 2015), to consume their culturally relevant foods, promote their food security, and have selfdetermination in their food choices.

4.2.2 Policy Areas and Their Impact

4.2.2.1 Intergenerational Impacts of Residential School Policy on Women's Families and Food Practices

To be clear, residential schools are considered as a policy intervention in this work, as they were designed and implemented by the Canadian federal government as one of the interventions in their assimilatory policy efforts towards Indigenous Peoples (de Leeuw, 2007; Wilk et al., 2017). Our Indigenous participants set the stage for their current realities and experiences by linking the traumas of residential school and what their mothers or grandmothers endured with an impact on the lifelong food practices and food insecurity of the survivors and their children. Laurie shared the story of her mother, growing up on the land in her First Nation, and how her First Nation would harvest in collective coordination—with dedicated hunting camps and trap lines. She indicated however, how her mother's attendance at residential school disrupted her life in many ways, including her overall well-being and diet:

"She had that knowledge from her parents, but then when she went to residential school she got exposed to anything but wild food, like porridge and stuff like that, milk. [...] They're just not used to that kind of foods so to introduce something that made them sick. There was a lot of malnutrition and overcrowding, she developed TB, her and her siblings. So, eventually she ended up back home with her mother because my grandmother got TB so they had to take care of each other. Then she was able to go back on the land again, but it was from there where she was able to pass on that knowledge."—Laurie, Cree woman residing in Thunder Bay

⁹We argue that the policies mentioned herein do contribute to the structural violence Indigenous Peoples experience in daily life as they are both the product of and reproduce the social conditions of discrimination and racism (Farmer, 2005) experienced by Indigenous Peoples. While there is sometimes acknowledgement that assimilatory policy during the settling of Canada has led to the health and social inequities experienced by Indigenous Peoples within reserve, off-reserve, urban, and rural settings in Canada today (e.g., chronic diseases, tuberculosis, food insecurity, suicides etc.), there is less analysis which ties other policy arenas, such as food safety regulation, as contributing to marginalization and consequent impacts such as food insecurity in present day.

Laurie's story demonstrated that only once their family was reunited on their harvesting lands could the cultural transfer of gendered food-related knowledges continue.

Similarly, Jennifer mentioned that in adulthood she reflected on unappetizing recipes her grandmother used to make her as a child—only to realize they were the foods she had grown accustomed to eating in residential school. Laurie also underlined how cultural food guidance was severed because of attending, or being a descendent of a survivor of residential schools:

"It wasn't people didn't want to do it [traditional food practices] before, they were ashamed. They did it, they just didn't do it openly like they are doing it right now. [...] Like my mom, she would, in [town]we wouldn't even build a fire or cook outside or anything. We would take a boat, go to an island and we'd build a fire and she'd cook her geese in hiding. And even when we roasted a goose or boiled a goose she made sure like wash your hands really good so no one smells you because of the smell. [...] Because they were told it's not the right way to eat, to cook. [...] Today it's being more celebrated. I think that's what we're doing, seeing all these more of the community trying to access land-based programs."—Laurie, Cree woman residing in Thunder Bay

Further, Kelsey touched on the intergenerational impacts of residential school on the women in her family – both her mother and grandmother, which contributed to her growing up and experiencing food insecurity in the city of Thunder Bay:

"So I'm originally from here, I guess this is where I've lived all my life. Like I was telling you, I grew up hungry, because I come from an Indigenous single mother. Survivor of resident school, and so is my grandmother. And kind of I guess off reserve, displaced woman, not really—she didn't really stay anywhere too long. [...] And then we ended up in Thunder Bay."—Kelsey, Indigenous Community Member

Indigenous women in this study shared the intergenerational impacts of residential schools that have broken family ties and led to themselves or other women in their immediate family moving away from home communities to urban settings, either for a short time or permanently.

4.2.2.2 Food Regulation—"No Food Sovereignty Within Food Safety"

In food regulation in Ontario, due to settler-colonial underpinnings of the definitions of health and food, there are fundamental differences in the way wild meat, as opposed to federally inspected meat, is viewed. We found that food safety and mitigating risk of food-borne illness preoccupied the health inspection team (i.e., staff who inspect food premises) over holistic notions of well-being derived from food. This instance is an example of disruptions of Indigenous knowledges of health and well-being. A policymaker highlighted their perception that wild game poses a significant food safety risk and how the current legislation inhibits Indigenous self-determination in personal, interpersonal, and community settings:

"It's just like, food safety, [...] We're wanting to make sure that it's processed to the same standard as bovine, with the same kind of oversight, or pork, for that matter. Just because it's, it reaches so many more people. I guess, it's interesting how it intersects with First Nations governance and self-determination. Because it's perceived as very limiting. [...] I can see how that would be so challenging, because it really, I don't want to say contradicts, but it doesn't, it's not in line with the whole meat processing, I don't know how OMAFRA would offer those kinds of exemptions when, it just contravenes the logic around meat processing and food safety."—Jayden, policymaker

This necessity to hold wild meat to the same Western food safety standards as farmed meat is unrealistic and the current provincial regulations do not offer organizations the ability to serve it regularly. In Ontario, to serve wild game in a community setting (i.e., food premise), first, it must be donated. Second, regulations require recording of the harvest location and personal information of the harvester, signage informing patrons they are consuming uninspected meat, recording of patron contact information, separate storage of wild meat, and specific sanitization procedures or use of separate kitchens to ensure no cross-contamination with other foods. By following these requirements and applying through the local health unit, organizations can be granted wild game event permits which allow the serving of game in public as a one-time non-profit event. This process is resource-intensive for organizations who desire to serve wild game consistently and reproduces structural racism. The Sioux Lookout Meno Ya Win Health Centre can serve wild game regularly due to their exception clause in food premise regulation (O.Reg 493/17: Food Premises, 2017),¹⁰ yet they continue to have to use separate kitchen facilities for food preparations. Thus, this approach, if legal, would still be unfeasible and unrealistic for most non-profits. An active harvester in Thunder Bay pointed out how Indigenous food practices are viewed as inadequate within this Western system. Their traditional practices for harvesting and butchering game are starkly classified as different and unsafe by health unit inspectors, evidenced by the hurdles in place to serve it:

¹⁰The Sioux Lookout Meno Ya Win Health Centre was created in response to a protest in 1988 regarding the poor health conditions of First Nations populations in Northwestern Ontario. Advocacy on behalf of the organization translated into an exemption in provincial food legislation ("Miichim: Traditional Foods, 2021). When the Ontario Food Premises Regulation 493/17 came into force on July 1, 2018, section 38 (5) named only one food premise, the Meno Ya Win Health Centre, as allowed to store and serve uninspected food, such as wild meat and fish, across the province (Ontario Ministry of Health and Long-term Care, 2017). The Miichim program offers Indigenous food minimum twice a week to their patients who are mostly from northern First Nations communities ("Miichim: Traditional Foods," 2021).

"So yeah, they [health unit inspectors] create barriers. Not only that, but when we package it and when we care for it, we have to do it in a specific manner that's to their code, *as if the process we have is unclean*. And then we have to have a separate freezer for it, so, you can't have any wild game near chicken. God forbid you do that, right? Poisoned chicken that's already dead."– Brooke, Indigenous community member.

The staff of Indigenous-serving organizations and Indigenous women strongly indicated that they experienced an overregulation of wild meats due to food safety concerns yet the under-regulation of all other foods being served to the public through non-profit organizations. This was maddening to Cameron because they repeatedly had to turn away wild game that was offered to the community kitchen before 2019 when they were legally unable to store it or serve it under provincial food premise policy. In particular, Cameron noted the low quality of foods being donated (e.g., rotten produce or unmarked meat) was never the subject of health inspection:

"Well, that's like I have all those conversations with the health unit. Like how can you come here and regulate this amount like to this capacity regulating whether I'm serving wild game or not but you're not regulating the rotten –vegetables coming in here and the ground beef. [...] Our freezer's full of all the other stuff that's been donated like [...] I don't understand the disconnect that's happening here. Why are you overregulating wild game but underregulating other stuff that probably is actually going to cause people to be sick?"—Cameron, Non-Indigenous staff of Indigenous-serving organization

The Indigenous participants and staff of Indigenous-serving organizations questioned why the health unit could accept the health risks of consuming poor-quality produce stemming from donations that could not be traced in the case of an outbreak yet, would not extend that same leniency to allow the serving of wild game without a large number of stipulations. The health inspectors must implement these food regulations, and thus the decisions of how to do so lie with them.

Here we view how settler colonialism acts through food policy, including how settlers think and act to promote a settler-colonial view of "health" undermining IFS. Impeding Indigenous Peoples from enacting their traditional practices of harvesting and consuming wild game as a culturally valuable food source may be further pushing food consumption towards market sources and contributing to disproportionately high rates of food insecurity. However, ultimately, it is a limit on IFS, of which selfdetermination and supportive legislation and policy are pillars.

4.2.2.3 Natural Resources Regulation—Arbitrary Treaty Boundaries and Colonial Control of Wildlife and Indigenous Bodies

As mentioned above, to ensure accordance with the provincial Fishing and Wildlife Conservation Act, health inspection teams

demand information such as the location where the game was harvested and the name of the harvester. Both staff of community organizations and harvesters pointed to how these requirements add to the surveillance of the movement and practices of Indigenous Peoples by the state. Also, the requirements reiterate Indigenous Peoples' settler colonial oppression as they are disrupted from sharing food with others. Brooke demonstrates their resistance:

"Then I have to sign paperwork, I have to say what I killed it with, I have to say where I killed it at, I have to say how hot it was, you know, how I took care of it. You know, it's giggle-worthy, that they think they're going to get any of that information. Yeah, sure, they're going to get things on a piece of paper, but you're never going to *actually know* where we shot that animal. Because it's none of their business [...] They don't appreciate when you put "the bush" or "the water"—Brooke, Indigenous community member

Our Indigenous participants highlighted how conservation officers are the direct enforcers of the Fishing and Wildlife Conservation Act, but health inspectors also monitor for infringements of the act when they approve wild game to be served to the public. Both conservation officers and health inspectors made it clear that the guiding principle of this regulation is to prevent the commercialization of wild game. However, this purpose must be questioned as Indigenous Peoples harvesting their Indigenous foods and sharing with their communities is infringed by the Act—and yet these practices are in no way in the spirit of commercialization. Moreover, and equally important, at the individual level, the federal government controls who is classified as a "status Indian" according to specifications in the Indian Act, and thus who is afforded the rights to harvest within the settler colonial resource management framework. The implementation of hunting regulation is a further application of the colonially constructed and imposed categories of Indigenous identities. Non-status Indigenous populations are left with inequitable access to traditional territories for lands-based practices.

The natural resources regulatory regime of Ontario has always been employed to settle and develop Ontario. Since the early 1900s the ideas of wildlife access for all, and conservation, were gaining popularity and Ontario policymakers continued with assimilatory motivations to protect the interests of sport hunters and fishers—with no recognition of Indigenous commercial economies and at the expense of Indigenous Peoples harvesting (Teillet, 2005). Many wrongly assumed that with the entrenchment of Aboriginal and treaty rights into the Constitution Act in 1982, natural resource policy would have to integrate these aforementioned rights (Teillet, 2005). In this study, the words of implementers of policy, confirmed the dominant discourses of preventing commercialization, protecting wildlife, land ownership and managing natural resources.

In practice, Indigenous Peoples harvesting is restricted according to provincial laws. Indigenous harvesters re-iterated that conservation officers did not understand the application of treaty rights and that instead, they clung tightly to precisions about the exact land people are on. Brooke points to their status in both Canada and the USA, and how they view their harvesting rights and experiences with conservation officers in Ontario:

"People don't really appreciate Treaty rights often, and they always try to challenge them-most Treaties, I don't know if you ever really look at them, you know, they'll say, you know, your Treaty area and your traditional lands. These are defined by non-Indigenous people. Now, I don't have a border anywhere. I'm actually dual Indian. So I'm American Indian, and I'm also Canadian Indian. And I also will harvest in any Treaty area I choose to, because of the reason that I just told you. I don't have these borders. I can walk where I want, and I'm going to kill something if I want to eat it. But you come across conservation officers-and I don't know if it's a resentment thing, or they're envious of the rights that I have-but they definitely try to push you and challenge things, and you know, you can outsmart them pretty quick. I say, oh, really, where's your GPS? Let's make sure we have the coordinates so we can look this up. Right? Which they don't appreciate, but it's always worth a good laugh. Conservation Officers are not my fav, at all."—Brooke, Indigenous community member.

The main sub-theme repeated by the Indigenous women who harvest was the arbitrary treaty boundaries which often do not reflect traditional territories of which their people have occupied for millennia. In particular, they described how the culture of conservation in Ontario – implemented by conservation officers—differed from other provinces, such as British Columbia. The Indigenous women underscored that in Ontario you must know exactly where each treaty boundary lies, which becomes comical in northwestern Ontario where multiple treaty areas all intersect. Dakota tells us an exemplary story:

"One time I was on a plane, I was coming from Poplar Hill, and we had someone from the MNR [Ministry of Natural Resources] on our plane with us, and it was a charter plane and someone had given us fish and we were like, oh no, only Treaty 5 can have those. And I said, well I'm Treaty 5, sure, but we were about to go into Treaty 3—hey, Treaty 3! [Laughter]. We were just throwing it back and forth. It was like, what are you going to do? But, Ontario is the only province or territory that tries to limit the Treaty rights and the portability of those Treaty rights. Between Treaty areas. Like, if I was in BC, if we were in BC we wouldn't have to worry about that."—Dakota, Indigenous community member.

Further, Dakota's comments signified how conservation officers do not understand that treaty and Indigenous rights are implemented as per the Canadian constitution. She compared their regulatory power and behaviour towards Indigenous Peoples to that of police officers. Equally, Indigenous participants highlighted that environmental management practices implemented by the Ontario Ministry of Natural Resources, such as spraying blueberry bushes, have disrupted the traditional harvesting lands and made wild food increasingly unsafe or inaccessible in proximity to urban living areas. Specifically, Dakota described how in the Ontario policy landscape, forests are treated as commodities, or "natural resources" whereas she sees the land, plants, animals as ecosystems that are interconnected with humans, a perspective that aligns with many Indigenous worldviews.

4.3 Policy Gaps and Entry Points for Improvement

4.3.1 Permanent Wild Game License

Throughout the duration of this study, health inspectors at the TBDHU have taken actions to assist the acquisition of wild game in Indigenous-serving organizations through the development and implementation of a permanent wild game license. The license was first negotiated with a shelter in the fall of 2019. For staff of Indigenous-serving organizations, the downstream impacts of a lack of provincial policy which supports consistent use of wild game in food premises (i.e., serving and storage) means that there are not detailed policies or practices in place to uphold the practice. In the case of Cameron's organization, they took it upon themselves to develop these policies from scratch and seek health unit approval. Here we examine the reactions from various stakeholders to give insight into the tensions surrounding the license. Also, we investigate its merits as an exemplary practice to be used in other jurisdictions.

The permanent wild game license does not change the necessary administrative barriers outlined above (e.g., tracking donations, putting up signage, etc.) but it translates to less surveillance of organizations. They are permitted to either solicit, store donations, or serve wild game whenever they desire. To acquire one of these licenses, organizations must meet TBDHU's health inspector's requirements. The staff of Indigenous-serving organizations we interviewed who were in the process or had recently acquired a permit described the health inspectors as willing to accommodate certain practices that are specific to the needs and resources of their organizations. Further, the ability to solicit donations gives an outlet to the residents of Thunder Bay (Indigenous and non-Indigenous) who have previously been refused the opportunity to donate wild game to Indigenous-serving non-profits.

Laurie and Samantha highlighted that for Indigenous Peoples, engaging with the health unit on topics of wild game can create more barriers than serving game without engaging them. Laurie recounted how she was cooking with wild game at her college but when her supervisor attended a meeting hosted by the health unit on serving wild game in institutions, he felt they could no longer continue with their existing practices:

"If we were to do anymore wild meat stuff like that, I would now be expected to fill out those forms [...] Now he wants to dedicate just one kitchen for wild meat

instead. We are segregating it now. I thought that was problematic. I was like 'what the hell did you guys do over there? You know I thought this was supposed to be helpful not set us back? So I was like I thought I got full range, freedom to do things there and then as soon as he went there [to the health unit meeting] I got restricted and I just wasn't too happy with that."—Laurie, Cree woman residing in Thunder Bay

We must ask: *who* is this license for? There is value in distinguishing this policy intervention's use within *Indigenous-led organizations* versus non- Indigenous-led organizations that *serve* Indigenous populations. This is crucial because the license is still enforcement of the problematic settler-colonial policies discussed earlier. As Indigenous Peoples, choosing to enact their Indigenous or Treaty Rights to harvest from their lands and consume this food are practices that should not be regulated by the local health units as that is not their jurisdiction.

Additionally, the permanent wild game license is based on Western food safety principles. These principles are derived from broader Western understandings of food science and food illness which are valued over socio-cultural and holistic understandings of food. One of the stipulations under the license is that meals with wild game are to be cooked from a list of pre-approved recipes that follow food safety principles and are approved by the health unit. This once again highlights discriminatory practices towards wild game and Indigenous knowledge (including its oral transmission). The shelter staff explained how insulting it would be to ask Elders to follow recipes provided by the non-Indigenous organization:

"They [health inspectors] had identified they wanted us to have recipes, which again, we laughed at because we don't do recipes for *anything*[...] Never have I been told I have to have this done for the pasta we cook every single day, or . . . tell the people what to do with the wild game, cause God forbid, it doesn't look like ground beef or smell like ground beef, we don't know what to do with it. I just thought that was absurd. [...] I'm white and I've never cooked wild game before, but here's my recipe for you to cook the meal that you have offered to cook for our community. Like, just so offensive."—Cameron, non-Indigenous staff of Indigenous-serving organization

Additionally, Jordan, a staff from another Indigenous-serving organization, said that while the license would be useful for their organization they have concerns about the lack of consultation and integration of Elders and traditional knowledge into the permitting process. Jordan reiterates that when their organization works with Indigenous-led organizations the non-Indigenous staff follow their lead and abide by their traditional cooking methods:

"We are supportive of the temperature charts and things like that to make sure that we're checking the temperatures of meat and things like that. [...] But if we're working at or with an Indigenous run organization we have a different conversation, we talk to the Elders about what they want to do, what they think is appropriate. Compared to in our space here, where we're like, okay we'll follow the process."—Jordan, non-Indigenous staff of Indigenous-serving organization

Throughout the process of acquiring a permanent wild game license for their organization, Cameron was never satisfied with the responses to their questioning of the food premise regulation. They were operating from a food sovereignty lens while the health inspectors continued to bring their values of Western food safety. When speaking with us they continually questioned the need for a separate wild game policy at all:

"I was like what about the hot-handling temps and she was like, "Well, I guess goose would just fall under poultry". [...] *Ya it would cause it's a bird*. Like, similar to like moose and deer falling under the same red meat as, *it's the same*. [...] So, I said, couldn't we just add this to our food policy to begin with? Why do we have to have a separate wild game policy if we already have one in place that says all these temperatures for all of these other things?"– Cameron, non-Indigenous staff of Indigenous-serving organization

Within the health unit themselves, we witnessed that public health nutritionists were working to instill values of IFS and Indigenous worldviews to the broader institution but that each sub-field of public health tends to prioritize the values that underlie their education and relevant legislation. In this case, there has been a local adaptation of provincial regulations, yet some participants suggested a hesitancy exists on the health unit's part to advertise it for fear of criticism from within the environmental health field. However, since 2017-2018, the public health nutritionists of the Northwestern Health Unit (NWHU) and TBDHU in northern Ontario have been using Northern Fruit and Vegetable Program Enhancement funding from the Ontario Government for an IFS portfolio.¹¹ Thus, the tensions will likely continue as food safety philosophies come into direct conflict with IFS when Indigenous populations try to access wild game in urban areas because food regulation was not

¹¹The Ontario Ministry of Health and Long-Term Care has funded the Northern Fruit and Vegetable Program since 2006 in the Algoma and Porcupine Health Unit and has expanded to others over time. The main program goal is to increase the consumption of fruits and vegetables for students in northern Ontario by providing two servings of fresh fruits and vegetables to elementary students weekly as well as educational resources on healthy eating and physical activity. In 2018, it expanded to the NWHU and the TBDHU catchment areas (Northwestern Health Unit, 2018.; Terry and Terry, 2018). Enhancement funding to this program targeting IFS is now part of annual funding for both health units. The responsibility to use this funding is part of the respective public health nutritionists' portfolios.

written with their interests in mind. Thus, the outcomes of the implementation of the license appear to have re-iterated many of the historical issues of racism, discrimination, and disruptions to IFS for Indigenous Peoples living in the urban center of Thunder Bay. We found the license was perceived as a barrier to Indigenous Peoples and Indigenous-led organizations but as an opportunity to Indigenous-serving organizations. Moving forward, the perpetuation of settler-colonial power in control over Indigenous Peoples' food practices should not be ignored.

4.3.2 Indigenous Led and Culturally Safe Collaborations Towards Indigenous Food Sovereignty

We learned from Indigenous women and staff of Indigenousserving organizations that improving relationships between the diverse Indigenous community and Indigenous-serving organizations is critical to community-level food security and takes financial and human resources. The public health nutritionists responsible for the use of the IFS funding have been instrumental in building genuine relationships with Indigenous partners, but they have lots of work ahead. The NWHU's approach is to partner with existing Indigenous-led organizations doing health and food work, such as the Sioux Lookout First Nation's Health Authority as opposed to direct engagement with each First Nation community, the strategy of the TBDHU.

Additionally, cultural safety training was recommended by Samantha to target inspectors with stringent Western food safety logic and practices to better promote the overall well-being and sovereignty of the community they serve. Indigenous participants underlined that it is the creation of culturally safe spaces for embracing Indigenous cultures, paired with increased access to wild game, that is key to keeping the cultural and spiritual aspects attached to Indigenous foods in urban spaces. The IFS funding injected necessary resources to bring Indigenous leaders from within these cities and regions together to begin strategically around Sioux Lookout and Thunder Bay. This is a potential first step, yet Samantha highlighted the tensions of government control over this funding:

"Like I told the health unit, I said, "I"m coming after that enhancement fund'. Because literally give that money to Indigenous folks who are directing their work in their communities and let's make change; like not you holding my purse strings or to tell me what I can and cannot spend on and fight me."—Samantha, Anishnaabe woman.

The sentiment that money should be going directly to community initiatives as opposed to funneled through Western institutions was mirrored by many, including non-Indigenous staff of Indigenous-serving organizations and staff of both health units. Samantha further expressed the need to break colonial governance structures in communities to see food across many areas.

We heard that productive partnerships working on Indigenous food systems between First Nations, Indigenous

organizations, community organizations, and policy stakeholders (including the health units) had IFS, as opposed to food security as their guiding principle. Peyton spoke from their perspective of a non-Indigenous person working for a health unit:

"We have a *very* broken system which we're all very aware of, it's not hidden. And plus we do need to change the system ... I think it is not necessarily the best approach to give health units the money for the First Nations' communities, but that's what we have so let's put it to good use."—Peyton, non-Indigenous staff of Indigenous-serving organization

Peyton acknowledged that there is an all-around agreement that the current provincial and federal government approach to food security in northwestern Ontario is deeply flawed in design which leaves colonial institutions in control. Equally, that non-Indigenous people working in health organizations must be reflexive of the policies they enact and the roles they can play in disrupting and reconfiguring these systems.

5 DISCUSSION

The burden of these current food and natural resource regulations, the application of the Indian Act, and the devastating intergenerational impacts of residential schools have been explored herein as equity concerns because they impede the rights of food, health, and culture for Indigenous Peoples. Policymakers explanations showed the values behind their practices in implementing food and natural resource regulations, illuminating in this context how the language and communication of land management comes from a Western world view of domination over non-human beings and is in conflict with Indigenous eco-philosophy based on the values of interdependency, respect, responsibility, and reciprocity (Morrison, 2011; Corntassel, 2012; Martens et al., 2016).

Yet, food can be a powerful tool to restore relationships with Indigenous identity when disconnected from land and culture (Robin and Cidro, 2020). Learning and practicing traditional food knowledges brings about feelings of pride and identity for our participants and other Indigenous women who have experienced disruptions in cultural food knowledge due to urbanization and assimilatory policy (Neufeld et al., 2017; Neufeld et al., 2020). We reiterate that women have central roles in Indigenous food cultures and continue to lead movements aimed at both social and environmental justice (Neufeld, 2020; Pictou et al., 2021). Our IBPA demonstrates how gender intersects with race among other social differences to illuminate how the structural constraints of policies impact women in their roles of harvesters and food providers.

Structural racism in colonial policy is responsible for the disproportionate health inequities experiences by Indigenous

Peoples in settler-colonial nations (Stout, 2018; Morrison, 2020). Specifically, Indigenous participants' destruction of access to Indigenous foods via policy can be understood as a form structural violence (Farmer, 2005). Structural violence refers to the ways in which large social forces are translated into the embodied individual experiences of assaults on the personhood, dignity, or value of the person causing suffering (such as experiencing racism or poverty) (Farmer, 1996, 2005; Scheper-Hughes and Bourgois, 2004). Depending on social positioning, this everyday violence is not visible or perhaps deemed legitimate or necessary as it is enacted by the state (Scheper-Hughes and Bourgois, 2004). Here, embedding individual experiences of everyday harm (i.e., limited access to fish and wild game and food insecurity due to disruptions in IFS) within the socio-political and cultural context of the province of Ontario demonstrates that the distribution of such harm is not uniform, but can be traceable back to political and bureaucratic decisions which cause extreme suffering. Through policymaking and implementation, immense power is felt by the groups that policies are constructed to oppress-in this case, Indigenous Peoples.

Pictou et al. (2021) and Kepkiewicz et al. (2015) highlighted that there is a need for current settler food movements to better critically engage with intersecting structural oppressions such as capitalism, colonialism, patriarchy, and white supremacy. We argue that provincial and federal governments who claim goals of improvement of health equity-specifically improving food security for Indigenous populations, must interrogate the tensions between goals and the deeply rooted white supremacist values permeating the institutions they represent. These experiences of confrontation with conservation officers highlight how a restoration of lands and water-based relationships by Indigenous Peoples are continually perceived by colonial institutions, both provincially and federally, as a threat to state sovereignty. In practice, provincial ministries give more power to resource extraction companies than Indigenous Peoples who are the first to experience impacts of changes to these ecosystems in multiple ways, including through food sources (Mintz, 2019). Calls exist for governments who manage wildlife and natural environments to authentically integrate Indigenous worldviews and rights into their policy and practices to promote Indigenous Peoples' ability to enact their rights to land-use (Loring and Gerlach, 2015; Ermine et al., 2020).

The racialization of wild game cannot be understood outside of the racism which exists in the city, and which the Indigenous women described. In cities with less racial tensions, possibly due to lower proportion of Indigenous Peoples, other health units may not be paying as close attention to wild game in institutions and thus reducing some barriers *via* lack of surveillance. In Thunder Bay, the issue of systemic racism in policing (McNeilly, 2018) and through the killing of Barbara Kentner (Porter, 2020; Ray and Burnett, 2020) has been brought to the public's attention and thus forcing reaction from the various institutions. Significantly, the issue of gendered violence is one that has been raised in the context of IFS (Morrison, 2020; Pictou et al., 2021). In sum, licensing as an intervention should be evaluated to understand the impact (if any) on addressing access to Indigenous foods in Thunder Bay to determine its value to be applied locally, within Ontario, or in other Canadian provinces.¹² At the time of interviews, many stakeholders were concerned about possible reprimanding by the health unit for those who chose to avoid this colonial process.

This work has revealed patterns of gendered impacts of settler colonialism that were identified in the National Inquiry into Missing and Murdered Indigenous Women and Girls. The report cited four pathways to the maintenance of colonial violence in Canada: 1) trauma that is historical, multigenerational, and intergenerational 2) social and economic marginalization 3) maintaining the status quo and lack of institutional will 4) ignoring the agency and expertise of Indigenous women, girls, and 2SLGBTQQIA people (National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019). The stories of our participants tied together the lives of women in their families and communities to demonstrate the everlasting impacts of residential school policy including processes of environmental dispossession which have indirectly contributed toward circumstances of food insecurity associated with disconnection from land and knowledge systems (Richmond and Ross, 2009). Our work exemplifies both the direct and indirect impacts of environmental dispossession on Indigenous communities. Directly, limited access to lands has the consequence of decline in harvesting and procurement skills, ultimately leading to low consumption of Indigenous foods. Through assimilatory policy such as the Indian Act, and the residential school system there is also a more indirect pathway explored in this work that impacts the well-being of Indigenous Peoples via decreased access to wild foods and food insecurity. Women recounted experiences of hardship of their mothers, intergenerational trauma, and experiences of themselves or Indigenous Peoples in their communities experiencing socioeconomic marginalization, interpersonal racism, and structural racism while enacting their traditional food practices. Understanding environmental dispossession as a distal determinant of health underlines the importance of addressing policy areas which contribute to it, in order to produce more benefits than solely addressing proximal determinants of health (Richmond and Ross, 2009).

The current barriers to sharing food in their preferred ways in the urban setting pointed to strong values and discourses of white supremacy, food safety, and conservation in institutions that implement the policies related to harvesting, sharing, and selling of wild game—as well as food processing and consumption. The question of institutional will is key as

¹²In terms of the permanent wild game license explored in this work, health units do have some flexibility in the interpretation of food premise regulation. In their interpretations, there should be more emphasis placed on a holistic and balanced approach to well-being, where food safety is but one consideration alongside Indigenous food sovereignty, and the right to privacy, food security, culture, and health.

individual health inspectors are evidently holders of power in the realm of urban Indigenous Peoples' access to wild meat—and the TBDHU has demonstrated a change in the application of wild food policy within the period under study. This evidence demonstrates that with institutional support in organizations serving game, as called for through Indigenous community resistance and support from ally organizations, innovative locally-informed solutions that center more holistic views of food and well-being can be implemented to partially overcome policy barriers.

The concept of cultural safety is relevant in moving forward with Indigenous and settler relations in the pursuit of IFS. Cultural safety acknowledges the safety risk of inappropriate interactions (Nguyen, 2008) and moves us beyond cultural awareness, which is simply an acknowledgment of culture in health contexts. To achieve cultural safety, there must be purposeful power-sharing and self-reflection of individuals within the organization alongside cultural training for service providers and policy-makers (Brooks-Cleator et al., 2018). Our research demonstrates how Indigenous-serving community organization staff have engaged in a reflection of their roles and worked to disrupt institutional barriers to accessing wild food for their Indigenous clients, indicating that some progress towards culturally safe environments may be occurring. However, it is clients themselves who have the power to define interactions or environments as culturally safe-and we also heard Indigenous women in this study describe the opposite. A cultural safety approach may facilitate existing cross-organizational work at the community level and lead to tangible results to promote food security, which is not in direct conflict with Indigenous conceptions of well-being.

Further, we propose further use of an IBPA framework to serve our understanding of urban Indigenous Peoples and women's experiences of inequity within Canada and internationally If governments at various levels are to adequately consider Indigenous Peoples as beneficiaries of their policies, they have a long way to go in terms of transforming policy development and implementation. The language within these policies also needs to be carefully considered, as well as how wild food policy is communicated. This research reveals that the values underlying the formation of regulation undoubtedly trickle down to those who implement it and those who feel its effects in their daily lives based on their social location (i.e., the intersection of characteristics such as class, geography, gender, Indigeneity, and Indian status). An intersectional approach to policy investigating Indigenous food security and IFS, can connect multiple interrelated inequities stemming from overlapping structural conditions. Consequently, there is an opportunity to take action in one sphere with broadreaching impacts on multiple health and social outcomes (e.g., food insecurity, poverty, mental health, chronic disease). Researchers should aim to share resources widely to stakeholders to increase public outcry and thus political action (Varcoe et al. 2011). Equally, the IBPA framework is based on the principles of time and space, making it useful in many contexts to promote a policy analysis for Indigenous Peoples' food challenges that is responsive to the historical complexities of colonialism, the trans-national climate crisis, and the global nature of industrialized food systems. A power-based analysis illuminates who holds privileges as a result of government action. In practice, the application of equity as a value is often actively avoided in Canadian government policy and decision-making (Varcoe et al., 2011).

6 CONCLUSION

This work is unique in its use of IBPA to analyze interview data, its focus on the inherent values in specific policies, and expressions of such values through institutions in Ontario as experienced by individual Indigenous women and their communities at large. We highlighted how stakeholders defined the topic of access to wild food, and how their actions either supported or disrupted the efforts for food security and IFS. We tied the colonial control over wildlife and the Western food safety discourse, with infringements on IFS, experiences of racism in food settings and on the land, as well as with broad control over Indigenous sovereignty in Ontario. The topic of accessing wild game and fish in the city brings together many aspects of Indigenous People's rights to live sovereignly in the nation-state of Canada. Provincial and federal governments must negotiate hunting and food policy that fosters IFS through a respect of Treaty and Indigenous rights in all places across Canada whether urban or remote, on or offreserve.

The examination of Indigenous and settler relations in urban Canada is critical and must be further investigated to promote IFS (Dennis & Robin, 2020; Pictou et al., 2021). Dismantling of settler colonialism requires settlers to redress epistemic violence in food studies and unlearn positivist Western knowledge systems while integrating diverse ways of knowing into decolonial practices (Pictou et al., 2021). Systemic racism and the tensions between the practice of different knowledge and governance systems grow when non-Indigenous people are unaware of how their values influence the way they see the world and interact with others. Jurisdictional confusion and siloed thinking in institutions is an indication of the inability to reconcile how food is interrelated to the natural world. We advocate in unison with previous demands for both individual and community self-determination to reinstitute healing and intergenerational food relationships for urban Indigenous Peoples within Canada (Neufeld, 2020).

To move forward, colonial governments must acknowledge that there are multiple ways of reaching the same goal: having access to and consuming culturally relevant foods and support well-being. Corntassel (2012) cautions against a performative rights-based discourse which the state implements to avoid strong movements of decolonization and resurgence. Respect, reciprocity, and interconnectedness are principles of Indigenous law that can help to decolonize Western-based notions of rights in the context of Indigenous populations (National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019). Recognizing Indigenous Peoples as the environmental stewards of their territories will support their collective food security as well as demonstrate exemplary practices to shift the values inherent in local, national, and global food systems we all rely on. As such, supporting IFS is part of a cross-cultural understanding process of prioritizing Indigenous knowledges, traditions, customs, and laws to inform action-oriented policy and community resiliency, tying to the broader goals of the sovereignty of food, land, and every aspect of Indigenous lives and reconstructing relationships amongst Indigenous and non-Indigenous peoples through food justice (Morrison, 2011; Martens et al., 2016).

Indigenous Peoples' lands and waters require protection that is not forthcoming from provincial governments. The above shows that, from Confederation on, Ontario never did, and never intended to respect, recognize or protect Indigenous lands and resources but rather grasped control by every available means, including the use of policy, force, settlement, public opinion, and in the courts (Teillet, 2005). There is a need to disrupt the inequality in privilege and power in policy-making that dictates governance of traditional lands and waters within Canada and other settler-colonial nations (Morrison, 2020). Indigenous Peoples and communities are critical to the evolution of humanity and the protection of biodiversity heritage. Meaningful participation and power in policy will enable the use of diverse knowledges, including Indigenous women, to facilitate a re-design of the agri-food system in a sustainable manner that supports Indigenous Food Sovereignty and respect for all land and waters-no matter the political boundaries (Morrison, 2020).

DATA AVAILABILITY STATEMENT

In order to protect the anonymity and confidentiality of the sample of participants, raw data will not be made available. The communities have small populations that would make participants easily identifiable.

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ETHICS STATEMENT

The study involving human participants was reviewed and approved by the University of Waterloo Research Ethics Committee. The participants provided their written informed consent to participate in this study.

AUTHOR CONTRIBUTIONS

KS and BPa contributed to the conception and design of the broader study. BPh designed the IBPA analysis, wrote the first draft of the manuscript as part of her MSc thesis, and the led writing of subsequent drafts. KS, BPa, and HN contributed to the manuscript revisions by making comments and edits in multiple drafts and approving the submitted version.

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