

Case 11: Nutraloaf

A disciplinary technique in prisons throughout the United States is being challenged in court. At issue is a type of food called “Nutraloaf” or “Meal Loaf,” which is served to unruly prisoners in lieu of regular prison food. Nutraloaf is made of whole wheat bread, non-dairy cheese, carrots, spinach, raisins, beans, vegetable oil, tomato paste, powdered milk, and dehydrated potato flakes. It is served on a single piece of paper to eliminate the need for dishes or eating utensils that might be used against prison personnel or other prisoners.¹ Everyone involved in this controversy agrees that Nutraloaf constitutes a nutritionally complete, though unappetizing meal.

Inmates who are restricted to eating Nutraloaf believe that this constitutes a punishment over and above their sentences. They are suing the Vermont Department of Corrections for feeding Nutraloaf without allowing prisoners due process. By law, prisoners may not be punished without a disciplinary hearing process to justify the punishment. So prisoners are not (currently) asking for Nutraloaf to be banned, but for a hearing before it can be used.

In the past, subjecting prisoners to Nutraloaf-like meals has been found to be punishment by a federal court in Michigan.² In an older decision, the U.S. Supreme Court found that a meal (called “grue”) used in Arkansas prisons could be cruel and unusual punishment if continued for long periods of time.³ However, the Illinois Court of Appeals found that prisoners were not entitled to a hearing before being put on “controlled feeding status”, nor did they find that substituted food constituted cruel or unusual punishment.⁴

Prison officials insist that Nutraloaf is an effective behavior modification technique rather than punishment. According to Vermont’s Department of Corrections’ Commissioner, Nutraloaf is given to prisoners who abuse food service privileges by using trays and utensils in assaults. Nutraloaf is also fed to inmates who throw feces or urine. Officials claim that once the behavior is stopped, regular food service options and utensils are restored. Disciplinary hearings are not required before prison staff use behavior modification techniques.⁵

¹ Ring, Wilson, “Vermont Inmates Take State To Court Over Unsavory Nutraloaf,” *The Boston Globe*. March 23, 2008. Sec. Local/Vermont.
http://www.boston.com/news/local/vermont/articles/2008/03/23/vt_inmates_take_state_to_court_over_unsavory_nutraloaf/.

² *United States v. Michigan*, 680 F. Supp. 270, 277 (W.D. Mich. 1988)

³ *Hutto v. Finney*, 437 U.S. 678 (1978)

⁴ *Arnett v. Snyder*, 2001 Ill. App. LEXIS 819 (4th Dist.).

⁵ *Globe*, supra n. 1.