The Australian Government is committed to preventive health measures that aim to increase physical activity levels of all Australians, and we support the development of the draft global action plan on physical activity 2018-2030 (the Action Plan).

We support the Action Plan’s comprehensive and multi-sectoral approach and the cross-cutting elements of the proposed actions under the four strategic objectives. The eight cross-cutting principles provide useful context and we welcome the focus on evidence based practice (as per paragraph 47e).

We are supportive of the recognition of the role of community engagement in planning and implementing environments aimed at promoting physical activity. We also welcome the linkages between the Action Plan and other previously agreed NCD strategies, acknowledging that maximising the synergies across these strategies is critical to achieving sustained outcomes.

General Comments on Content

- The introductory paragraphs (1-44) outline a comprehensive rationale for the Action Plan. While appreciating the importance of a concise introduction, we consider that this section would also benefit from additional text specifically exploring the relationship between mental health and physical activity, based on current evidence.

- While we appreciate the intent of the Action Plan’s goal (paragraph 46) we would welcome further clarification on how the goal as it is currently framed would be measured. We would also welcome further context on how it is anticipated the indicators and strategic objectives link to the achievement of the goal.

- We note that the ‘level’ of physical activity or inactivity is used as a general term throughout the Action Plan. We consider there is scope for the Action Plan to give further attention to the type, frequency, duration and intensity of physical activity. This could be achieved by making specific references to the benefits of moderate and vigorous exercise. It would also be useful to define what is meant by ‘levels’ of physical activity or inactivity in the glossary.

- We note that paragraph 51 recognises that the plan ‘provides a suggested range of proposed actions that each Member State can adapt, taking into account national circumstances’. We fully support the inclusion of this statement, and would appreciate further consideration to some of the language currently used to define specific actions for Member States. Specifically we would caution
against the use of terminology such as ‘mandate’ or ‘enforce’ (currently used in paragraphs 66, 83 and 95) given the complex and diverse governance systems for Member States, and would suggest ‘develop and implement’ as alternatives that are consistent with wording in the Action Plan.

- For example, Australia’s governance system consists of national, sub-national and local governments, each with their own legislation. This division of responsibility may affect Australia’s capacity to implement some of the proposed action areas at a national level, particularly in the area of urban design policy, improved transport provisions including active transport, adequate recreational spaces and sports amenities, increased physical education in the education system and some areas of health promotion.

- On Proposed Action 3.2 we propose the inclusion of the word ‘referrals’ so the text reads - *Implement the integration of patient assessment and provision of advice [and referrals] on physical activity by appropriately trained health and social care providers in primary and secondary healthcare and social services.*

- In the Glossary we propose the definition of Primary Health care services be amended to included ‘a health or medical practitioner’ to avoid limiting the provision of care to medical practitioners. The text would read – *health care provided in the community for people making an initial approach to a [health or] medical practitioner or clinic...*

**Indicators**

- We welcome efforts to align indicators with existing data collection mechanisms, particularly the Noncommunicable disease Country Capacity survey and the 2030 Agenda for Sustainable Development monitoring indicators.

- We note however that the proposed indicators apply to a variety levels of government. For example, some reflect national level policy decisions whereas others are seeking to measure community-based engagement at the sub-national or local levels. As per our previous comment on the complex and diverse governing systems of Member States, in some instances Australia would not be in a position to report against all indicators currently proposed in the document. Consideration could be given to dividing the indicators in some way to recognise different national circumstances and the challenges some Member States may have in reporting against all indicators, for example by defining ‘core’ indicators and ‘optional’ indicators.