22 September 2017

gappa@who.int

Dear Dr Fiona Bull


The New Zealand Ministry of Health (the Ministry) would like to convey its thanks to the World Health Organization for the opportunity to input into draft zero of the Global Action Plan on Physical Activity (GAPPA).

The Ministry understands that this document is a global action plan, and as such not all of the elements will be applicable to the New Zealand context or may be viewed with a different priority in other countries.

The Ministry has sought the views of a number of government agencies with an interest in physical activity including Sport New Zealand, the Ministry of Transport, New Zealand Transport Agency, Ministry of Education, and the Accident Compensation Corporation. Any views received from these organisations are contained within this submission.

Overall, the Ministry supports the development of a Global Action Plan on Physical Activity but would like to see the plan strengthened and simplified, to reduce the possibility of misunderstanding and make it easier for countries to implement.

Summary

1. Overall, the GAPPA is good, and incorporates many of the elements you would expect to see in a document such as this. For example cross government activities with transport, sport and recreation and education.
2. There are multiple actions for different players - perhaps these could be presented by the actor rather than the objective. For example, a member state could just look at their actions.
3. There is a focus in the document on increasing sports participation. New Zealand, like many developed countries, is experiencing a decline in traditional structured sport. However, unstructured active recreation is gaining popularity and should be reflected in any recommendations1.
4. The GAPPA should ensure the links between physical activity and better educational outcomes are clearly articulated.

5. There is a focus on programmes, which may or may not be sustainable especially for developing countries. We would like to see more emphasis on making the healthy choice the easiest choice (through active transport initiatives and better urban design - especially as it is estimated that 95% of urban expansion in the next decades will take place in developing countries\(^2\)).

6. In paragraph 14 walking, cycling, active recreation, sports, dance and play are listed. We question the emphasis on dance specifically as this is another form of active recreation. We suggest grouping activities under the following headings:
   - 'active transport' (walking, cycling, scooting, skateboards, e-bikes, and shared modes such as public transport)
   - 'active recreation' (e.g. unstructured, non-time bound activities such as dance, gardening, walking, diving, swimming)
   - 'sports' which are constrained by time, rules etc. (e.g. team sports such as football, 'netball' etc.; individual sports such as athletics)
   - 'active work' (such as farming, labouring, fishing, postal delivery by bicycle)
   - 'play'.

**Formatting**

7. The GAPPA would benefit from reformatting to present the information concisely, with deeper discussions or justifications being attached in appendices.

8. Plain language should be used throughout.

9. Background information could be displayed visually to make it more appealing. For instance, the statistics on how physically active people are could be displayed via infographics.

10. The GAPPA should be available in multiple languages to allow the widest possible access and engagement.

**Statements/actions**

11. The four strategic objectives could be presented at the start of the document for greater prominence.

12. To avoid the risk of ranking statements in order of importance, numbering could be replaced by colour-coding or bullet points.

13. The Ministry would like to ensure that all solutions reflect the wide variety of indigenous and multi-ethnic settings that are reflected globally.

**Linking to other health impacts/goals**

14. The Action Plan could embed physical activity within and across health by proposing actions to improve overall health. For example
   - limiting the marketing of unhealthy products (e.g. high fat, salt and sugary foods and drinks and alcohol) at sport and recreation events
   - restrictions on sponsorship of unhealthy products by high profile sports players.

15. It would be useful to emphasise the role and contribution of physical activity to social cohesion, reduced crime, improved mental health and resilience, and addressing climate change.

16. The GAPPA could link to the Mental Health Global Action Plan and Equally Well.

17. More emphasis could be placed on workplaces to reduce sedentary behaviour and the importance of activities of daily living (e.g. by providing sit/stand desks, opportunities for physical activity during work hours (e.g. centralised stair wells), and flexible working hours.

18. The Ministry would like to see more information on the importance of:
   o reducing recreational screen time
   o reducing time in front of screens before bedtime (to avoid blue light)
   o encouraging the correct amounts of sleep
   o the impact sleep has on physical activity/sedentary behaviour.

19. The Ministry suggests there is an opportunity to support the importance of physical activity and connecting with nature. This is particularly important with the growth in urban dwelling as outlined in point 5.

20. The Ministry suggests emphasising that physically active people:
   o have developed the basic motor skills and movement patterns establish physical competencies that enable people to be active and capable members of society
   o are more likely to be free from serious injury than physically inactive people
   o rehabilitate from injury at a faster rate than physically inactive people.

Transport

21. The Ministry is pleased to see a strong focus on improving active transport and the built environment.

22. The Ministry suggests that the GAPPA could include expanded reference to the role of transport on health. Transport is a major driver of health outcomes, both positive and negative, depending on the mode(s) of transport chosen. For example, transport choices can directly affect physical activity levels, air pollution, noise, access to health care services, mental health, injury risk, disability and also indirectly affect access to employment, education, food and social cohesion.

23. The GAPPA perhaps does not emphasise the infrastructure required to reduce barriers to active transport, particularly around shared use facilities, safety, lighting and road rules.

24. Active transport and the built environment both contribute towards United Nations Sustainable Development Goals including:
   o goal 3 ‘health and wellbeing’
   o goal 9 ‘industry, investment and infrastructure’
   o goal 10 ‘reduced inequalities’
   o goal 11 ‘sustainable cities and communities’
   o goal 12 ‘sustainable consumption and production’
   o goal 13 ‘climate action’.

25. Transport policies and systems that prioritise walking, cycling and public transport could be added to paragraph 2.

26. Urban design regulations and infrastructure that provide for equitable and safe access for recreational physical activity, and recreational and transport-related walking and cycling across the life course could be added to paragraph 3. For example:
   o trading taxi fares from office to meetings in favour of walking, cycling and public transport
   o adopting other transport policies, such as moving to electric vehicle fleets which contribute to a reduction in air pollution, nitric oxide and nitrogen dioxide, fine particle matter (PM10 and PM2.5) and noise.

Missing information

27. The Ministry suggests that opportunities to reduce workplace physical inactivity and increase physical activity could be added into the GAPPA.

28. We suggest adding the importance of play as a universal right to paragraph 2, as well as a reference to Article 31 of the United Nation Convention on the Rights of the Child.
Multi-sectoral approach

29. The Ministry welcomes statements in the GAPPA that recognise that a successful action plan will require a multi-sectoral approach.

Definitions

30. The Ministry suggests that physical activity could be defined as “any form of bodily movement performed by skeletal muscles that result in an increase in energy expenditure”.

31. Page 2 sets a voluntary target of a “10 percent reduction in insufficient physical activity by 2025”. Insufficient physical activity could be defined as either:
   - ‘doing less than 30 minutes of moderate intensity physical activity each week’ or
   - a 10 percent increase in people ‘meeting the World Health Organization’s physical activity guidelines’.

Specifics

32. The Ministry suggests that:
   - new innovations in paragraph 47(e) should be encouraged but must have robust monitoring and evaluation to build the evidence base across settings and for different populations
   - indicators in paragraph 53 could include physical activity in the professional training of education providers
   - paragraph 109 could be reworded to emphasise that some sedentary activities (e.g. reading with your child) are important for under-fives and should be encouraged.

New actions

33. The Ministry suggests adding the following new actions for member states:
   - the development and implementation of a whole of government Physical Activity and Active Transport Policy for government workplaces
   - the development and implementation of physical activity guidelines for all ages (or adoption of World Health Organization physical activity guidelines).

New indicators

34. The Ministry suggests the following indicators of success are added under paragraph 53:
   - percentage of the population who use active transport to get to and from work or education
   - percentage of countries with physical activity guidelines for all age groups
   - ratio of bike to private car sales at population level.

Yours sincerely

[Signature]

Dr Stewart Jessamine
Director
Protection, Regulation and Assurance