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Dear Dr. Herick de Sa,

Please find below ISEE's comments regarding the WHO global action plan for physical activity 2018 – 2030, WHO Discussion Paper.

With best regards,

Manolis Kogevinas, ISEE President

**Comments of the International Society for Environmental Epidemiology on the
“WHO global action plan for physical activity 2018 – 2030, WHO Discussion Paper”
(version dated 1 August 2017)**

The action plan acknowledges the importance of appropriate physical environments for achievement of healthy levels of physical activity in the population. Considering high relevance of physical activity as health determinant as well as the beneficial effect of the healthy environments in general, ISEE warmly endorses this comprehensive Global Action Plan. Here are some comments and suggestions on its possible improvements based on the review of the WHO Discussion Paper¹.

1. The “General structure of the action plan” (paragraph 14) introduces seven different types of physical activities “walking, cycling, active recreation, sports, dance and play,” but the selection of those types of physical activity over other types is not explained or justified, and this preference is maintained through the entire document. We suggest including a better description of physical activity classification similar to the proposed in paragraph 18 “work, transport and leisure physical activity.” Including these three main dimensions for physical activities in all the document description, objectives, indicators and actions will help to distribute more equally the actions and indicators in those dimensions.
2. Better explaining the rationale and opportunity provided by active travel is needed. While there are a few bullet points on why increase sports participation, there are no clear bullet points showing that active travel is especially attractive mode of PA. In particular, the facts that it allows people to easily integrate exercise as part of their daily routines, not requiring any special time commitments and that it is affordable for most people should be highlighted (somewhere around point 21). This should justify the recommendations made in Actions 1.4, 2.1 and 2.2.
3. Leisure physical activity is mentioned in the document but mainly focused on sports. More discussion on other forms of leisure PA, especially those appropriate for less fit or older people, would be useful.
4. Work related physical activity is mentioned rarely in the document. More balance between the three different physical activity dimensions (work, leisure, and transport) is required. At the same time, it is important to mention that work related physical activity might also be harmful especially for the cardiovascular system and the musculoskeletal system - and needs to be evaluated within such a context^{2, 3, 4}.
5. The importance of the physical environment as a determinant of leisure time (sport and recreational PA) deserves to be underlined more prominently. High quality urban green space, safe streets, well-designed communal facilities, opening of school athletic fields to the community members after school hours – these are just some of the examples that we know make a difference. Local cultural and natural conditions may

¹ The comments were prepared by: Audrey de Nazelle, Imperial College London, United Kingdom; David Rojas-Rueda, ISGlobal, Barcelona, Spain; Alistair Woodward, The University of Auckland, New Zealand.

² Holtermann A, Krause N, van der Beek AJ, Straker L. The physical activity paradox: six reasons why occupational physical activity (OPA) does not confer the cardiovascular health benefits that leisure time physical activity does.. Br J Sports Med. 2017 Aug 10

³ Holtermann A, Hansen JV, Burr H, et al. The health paradox of occupational and leisure-time physical activity. Br J Sports Med 2012;46:291–5 .doi:10.1136/bjism.2010.079582

⁴ Vignon E, Valat JP, Rossignol M, et al. Osteoarthritis of the knee and hip and activity: a systematic international review and synthesis (OASIS). Joint Bone Spine. 2006;73(4):442-55.

create an opportunity for increased PA, such as free use of ski slopes or tracks in Nordic countries, or swimming facilities in countries with warm climate.

6. Co-benefits are acknowledged but the document should make it clear that they are not earned automatically. For example, there are plenty of ways in which PA can be increased that are not low carbon (isolated sports facilities with no public transport, PA interventions in schools that multiply car trips by parents etc.). It would be helpful if a guide to decision-making on ways to optimize benefits across multiple sectors would be prepared.
7. What blocks progress? We think the plan does not pay enough attention to this question. No-one can question the value of physical activity. So why most populations become less active, not more? The truth is there are powerful forces driving levels of activity in the wrong direction. The changing nature of work, cultural and commercial pressures to consume certain goods (in the home as well as at work), and high speed urbanism leading to dispersed and fragmented lives, are just some examples. Increasing physical activity will require pushing back against these forces. There will be trade-offs required (e.g. increase the cost of using motor vehicles, re-allocate road space, preserve open spaces in cities). How can local authorities and national governments be supported to challenge and overcome significant obstacles? Accessible, practical, accurate information might be one contribution (such as ways to respond to claims that “telling children to be active is all our schools need to do”, or “our roads are too dangerous to cycle on”, or “a little bit of screen time doesn’t do my child any harm”).
8. The document pays much attention to urban settings, with very limited mention of rural settings including background information, indicators or proposed actions. More balance between the urban and rural settings is required in the document.
9. Goals and indicators of success: it is not clear how the goals and indicators of success were chosen: we may assume their choice has been determined by data availability – this should be stated clearly as otherwise we could think of many other indicators to include. Many of the proposed actions do not have indicators of success to be monitored. Nor do all indicators include a proposed action to collect the needed information.
10. Proposed actions are essential mechanisms to achieve the strategic objectives. However only one proposed action highlights the relevance of financial mechanisms. Reference to them is missing elsewhere. Preparation of guidance on the effective financial mechanisms and good practices are needed for all actions proposed. Finally, financial mechanisms and funding participation should also be presented in all the proposed actions for international and national partners.
11. No plan will succeed without a powerful monitoring and evaluation component. Therefore a proposal for actions to develop a comparable and robust global data on physical activity related to work, transport and leisure, enabling monitoring of the actions and their progress, would be needed. The secretariat also needs to produce an operational manual and guide on how to implement this global database and make available the tools to collect the information. This needs to be accompanied by capacity building, financial mechanisms and support by public and private initiatives.
12. Monitoring of physical activity is mentioned in several places (for instance p.27/8). However little is said about the measurement of physical activity. This is not straightforward, and as a result, there is frequently a lack of robust data on which to plan interventions, and by which to judge their effectiveness. We suggest there is a role here for the secretariat, to review the measurement question, to assess the value of

emerging technologies (e.g. wearable sensors, smart phone apps), and to provide recommendations to national bodies that conduct surveys and report on progress towards targets for PA.

13. Goal: a 10% change in physical activity behaviors of population was proposed with this plan. The percentage proposed is, in our opinion, too small (only 10% by 2030?) We need more ambition from the WHO and the Member States, and better goals, at least 30% change if not more (similar to SDG indicator 3.4).

Minor comments:

1. An overview of proposed actions (with indicators) should be presented in a table or “checklist” to help with evaluation of the Plan and the follow-up of the proposed actions.
2. We don’t think the introduction to the plan emphasizes sufficiently the positive effects of physical activity on mental well-being and work productivity.
3. The relevance of the “physical activity inequalities” related to sex, gender, age, geography and socio-economical status is highlighted throughout the document. But the indicators proposed do not cover these characteristics. We propose to include indicators with these dimensions to be able to monitor and evaluate the reduction of the inequalities.
4. The “Overview of the global situation” brings more examples from certain countries like Finland, Brazil or UK while other countries, regions or contexts are clearly missing like “Africa” or “the Middle East.” In para 19, the point about high income countries is not very clear (i.e. walking and cycling have been stable in last 15 years but lower than in LMIC? Rephrase). The WHO draft document is a global plan, so an extra effort to present background information from all the regions would be highly appreciated.
5. There are many references missing in the document. Example paragraph 22, “participation in LMIC in any exercise is very low” (no reference).
6. Point 21 brings up the potential negative consequences of active travel – the evidence on the balance of benefits of risks might also be cited at this point (and we also suggest moving that point close to point 34 which deals with similar issues).
7. Point 26 could add “walk to school” programmes.
8. The relevance of early life physical activity including physical activity in pregnant women should be highlighted (in paragraph 28).
9. Paragraph 30 mentions that some countries like Canada, Finland, and Brazil, have successfully increased physical activity levels in the last years. However, these good experiences are not referred to in other parts of the document. This information could be useful in understanding good practices in physical activity promotion.
10. Paragraph 33. The following reference on the health co-benefits of urban planning policies related to physical activity could be added: Mueller N, Rojas-Rueda D, Basagaña X, Cirach M, Cole-Hunter T, Davdand P, Donaire-Gonzalez D, Foraster M, Gascon M, Martinez D, Tonne C, Triguero-Mas M, Valentín A, Nieuwenhuijsen M. Urban and Transport Planning Related Exposures and Mortality: A Health Impact Assessment for Cities. *Environ Health Perspect.* 2017Jan;125(1):89-96.

11. Paragraph 36 mentions that “walking and cycling increase the economic value and activity in local areas”. It also brings the “gentrification” effect, which also needs to be highlighted. Gentrification also needs to be considered in the indicators and proposed actions.
12. Paragraph 47. Physical activity of pregnant women is missing in the life course approach paragraph.
13. Evidence based practice, page 14. Health impact assessment is a great absentee in the document, especially in this section and in the proposed actions.
14. Objective 1, indicators of success: I. “X % of countries that have implemented a communication campaign on physical activity” should say “X % of countries that have implemented a new communication campaign on physical activity related to work, transport and leisure activities.”
15. Objective 1, indicators of success: III. “X % of countries conducting a least one community based mass participation event annually” should say “X % of countries conducting a least one new community based mass participation event annually at the national level.”
16. Objective 1, indicators of success: IV is focused on air quality, but maybe it would be better to focus on active transport trips (# trips per day/year) or modal share (% trips made in each mode of transport)? An improvement on air quality is not synonymous of increasing physical activity, so it is more important to have an active transport indicator than an air quality indicator in this guidelines.
17. To reduce the gaps between vulnerable groups, it will be important to develop indicators for these groups. So it is proposed to include split by sex, socioeconomic status, geography, etc. for relevant indicators.
18. Proposed action 1.1: paragraph 58. It would be very useful if the secretariat could compile an international calendar on all the proposed campaigns to promote synergies between campaigns (walk21, agita mundo, etc.).
19. Proposed action 1.3: paragraph 66: please also include teaching and training health professionals in “Health in all policies”, promote intersectorality and health impact assessment.
20. Paragraph 70. Please also include the development of an “operational manual” for this action, including how to promote intersectoral and health in all policies approach for physical activity.
21. Strategic objective 2. Paragraph 79. Objective I. “average share of the built-up area of cities that is open space for public use for all.” Please include the definition in the glossary of “open space.” and the unit of average share or open space in cities: average per person, per geographical area, etc. The indicator could also include “safety” in the definition and some public space characteristics that stimulate the use of the public space (like aesthetic, cleaning, maintenance, amenities, etc.). Also, an indicator for Objective 2 could specify an access to bike lanes and sidewalks.
22. Strategic objective 2. Paragraph 79. Objective II. Please also include the proportion of the population that has “convenient access to walking and cycling.”
23. Proposed action 2.4. Paragraph 100. Please also include “reduce sitting,”. Evidence shows that sitting is a relevant risk factor in work and leisure activities, so guidelines to reduce sitting for the building will improve physical activity. Furthermore, provision of showers at work and safe place to store a bicycle could be included.
24. Strategic objective 3. The indicators are focused on children although the objectives mention all ages. Could this indicator also be included for other populations (especially elderly)?

25. Point 138: include provision of bike lanes and sidewalks in the last point. Also add in that point improved multi-modality including safe access by walk or bike to transit stations, adequate bike parking at transit stations, and ability to enter trains with bikes.
26. Point 141: (objective 4) could include % of countries which have produced a walking or cycling strategy. Proposed actions should also include the development of walking and cycling strategies for member states, and guidelines for the development of walking and cycling strategies for the secretariat.
27. Proposed action 4.3: a proposed action could include a surveillance system of professionals (at the city level in transport and planning sectors especially) to assess levels of awareness, knowledge and capabilities to promote walking, cycling, active recreation sports and play.
28. Proposed action 4.6: include developing formal training in other sectors (transport and urban planning) on the importance of physical activity for health and their role in creating environments that promote active lifestyles.