



25 August 2022

s 9(2)(a)

By email: s 9(2)(a)
Ref: H2022009687

Tēnā koe s 9(2)(a)

Response to your request for official information

Thank you for your further request under the Official Information Act 1982 (the Act) to Manatū Hauora (Ministry of Health) on 4 August 2022 for information regarding to the Eating and Activity Guidelines for New Zealand Adults.

On 11 June 2022, Manatū Hauora received a request for information from you for:

"Part 1: I would like to make an information request the main documents pertaining to the process, beginning in 2013, for developing the Eating and Activity Guidelines 2015. Namely, I would like the discussion documents (the main summary document created at the end of the process) for each of these processes:

"Work on the update began 2013, including:

- Technical Advisory Group (TAG) review and discussion of evidence bases*
- Eating and Activity Statements drafted (in conjunction with TAG)*
- limited stakeholder consultation and focus group testing with the public on draft statements*
- draft Eating and Activity Guidelines document*
- TAG review*
- internal Ministry of Health review*
- external review: health practitioner/non-government organisation review, government agency review, food industry review*
- limited stakeholder consultation."*

From: <https://www.health.govt.nz/our-work/eating-and-activity-guidelines/current-guidelines/process-developing-eating-and-activity-guidelines>

Part 2:

Please provide all information (emails, texts, meeting minutes, reports, memos or any other official correspondence) relating to the process involved during and after the final stakeholder consultation involved in the process for developing, and release of, the Eating and Activity Guidelines.

To clarify, I want all official information involved in the process during the final consultation, what steps were taken by the Ministry of Health following the consultation, including any discussion by the Ministry of Health in relation to the stakeholder submissions. To clarify, please provide all what points raised by stakeholders that were

accepted by the ministry and subsequently changed in the guidelines before their release in 2015.

From the Ministry of Health website: "Work on the update began 2013, including: Technical Advisory Group (TAG) review and discussion of evidence bases Eating and Activity Statements drafted (in conjunction with TAG) limited stakeholder consultation and focus group testing with the public on draft statements

draft Eating and Activity Guidelines document

TAG review

internal Ministry of Health review

external review: health practitioner/non-government organisation review, government agency review, food industry review

limited stakeholder consultation.

In 2015, the Eating and Activity Guidelines for New Zealand Adults document was published."

On 22 June 2022, Manatū Hauora asked you to refine your request as the information requested would require substantial collation and research and might be refused under section 18(f) of the Act. On the same day, you agreed to refine (by way of phone call) your request to:

"The review documents from the 2013 TAG and industry/stakeholder meetings (if they exist) and if there was a discussion document detailing what happened in the meetings, and what feedback the Ministry took from industry and put into the draft and final eating and activity guide document.

If the Ministry has any information about the previous review as well, you would like that documentation.

If the Ministry doesn't hold any discussion documents etc, can the Ministry please provide a narrative response, detailing what the process was and how the Ministry took on the feedback".

On 11 July 2022, Manatū Hauora provided a response to this refined request for information (H202207785 refers). On 12 July 2022, you made a further request for information as you considered the response you received on 11 July 2022 did not provide you with the information you were seeking. This further request was for:

"Unfortunately this does not give me the information I was seeking in regards to the process taking place between the final Stakeholder Consultation and the publishing of the Eating and Activity Guidelines document.

I've attached the process as it is published online and circled the period of time I am referring to - currently, there is no guidance as to what took place, including any checks and balances, between the consultation and the final code. It simply states the date 2015 with no explanation.

s 9(2)(a)

[REDACTED]

Another thing I'd like to raise is that the OIA document I received did not

include the feedback from Fonterra or minutes from meetings with stakeholders. I know these exist as I have read them in someone else's OIA - can you please explain why this was not included?"

On the 22 July 2022, Manatū Hauora contacted you to clarify the scope of your request. You advised (by way of phone call) you were looking for particular documents and information around the process that took place between the consultation with industry and the publication of the final Eating and Activity Guidelines in 2015.

On 4 August 2022, Manatū Hauora provided a response to your further request for information (H2022007313 refers). On the same day, you made a further request for information as you considered the response you received on 4 August 2022 did not provide you with the information you were seeking. Please find a response to each part of your further request below.

- “1. the review "by Ministry staff following feedback from selected stakeholder consultations",*
- 2. the "iterative process" following the stakeholder feedback and*
- 3. the "expert peer review completed prior to publication".*

Manatū Hauora has identified one document within the scope of the first part of this request entitled *Eating and Activity Guidelines Series Key Statements – Analysis of submissions from key stakeholders*. A copy of this document is enclosed and released to you in full. This report analyses the mixture of brief and detailed feedback gathered from submissions received.

Manatū Hauora has endeavoured to search for any information within the scope of the second and third parts of your request. However, no information was found. The “iterative process” and the “expert peer review” are not individual stand-alone documents or reports but are instead a series of administrative emails between advisers in Manatū Hauora as the draft Guidelines were reviewed, edited and updated. Therefore, this part of your request is refused under section 18(g) of the Act on the grounds that the information sought is not held by Manatū Hauora or any other agency subject to the Act. While the administrative emails are not within scope of your request, you may wish to make a new request for information for these under the Act.

In reviewing these requests and the responses provided, Manatū Hauora has endeavoured under section 13 of the Act to provide reasonable assistance in meeting your requests. Before making a further request, you may want to consider reviewing guidance published by the Ombudsman on how to make requests at: www.ombudsman.parliament.nz/resources/making-official-information-requests-guide-requesters.

Under section 28(3) of the Act, you have the right to ask the Ombudsman to review any decisions made under this request. The Ombudsman may be contacted by email at: info@ombudsman.parliament.nz or by calling 0800 802 602.

Please note that this response, with your personal details removed, may be published on the Manatū Hauora website at: www.health.govt.nz/about-ministry/information-releases/responses-official-information-act-requests.

Nāku noa, nā

A handwritten signature in black ink, appearing to be 'A. Old', written in a cursive style.

Dr Andrew Old
Deputy Director-General
Public Health Agency

EATING AND ACTIVITY GUIDELINES SERIES KEY STATEMENTS

Analysis of submissions from key stakeholders with expertise as health practitioners, dietitians, clinical exercise physiologists, community health providers, the food industry, and individuals that provide advice on nutrition and physical activity to the general public

MAY 2014

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

Contents

Executive summary	2
Introduction	2
Method	3
Results	3
Submissions.....	4
Submissions analysis	4
Overall nutrition statements.....	4
Nutrition statement 1	5
Nutrition statement 2	5
Nutrition statement 2a	6
Nutrition statement 2b	6
Nutrition statement 2c	6
Nutrition statement 2d	7
Nutrition statement 3a	7
Nutrition statement 3b	8
Nutrition statement 3c	9
Nutrition statement 4	9
Nutrition statement 5	10
Nutrition statement 6	10
Overall physical activity statements	10
Physical activity statement 1	11
Physical activity statement 2	12
Physical activity statement 3	12
Physical activity statement 4	12
Physical activity statement 5	13
Summary of key findings	14
Next steps	16

Executive summary

The Ministry of Health (the Ministry) conducted a limited stakeholder consultation between 9 and 22 April 2014 on the draft guideline statements for the *Eating and Activity Guidelines Series (EAGS)* (the statements). The statements were sent to 23 external organisations and nine groups within the Ministry, all of whom were chosen because of their expertise as health practitioners, dietitians, clinical exercise physiologists, community health providers, the food industry, or because they provide advice on nutrition and physical activity to the general public.

This report analyses the mixture of brief and detailed feedback gathered from submissions received by the Ministry.

Generally, the statements were well received and there were a few comments that could be themed together. Four common themes emerged: the use of plain English throughout the document, appropriate promotion of the short and snappy statements, the relationship between food and activity; and the need to increase the cultural relevance of the statements for all New Zealanders.

Concerning the nutrition statements, several submitters made comments about emerging evidence on the harm/benefit of diets high in saturated fat (nutrition #3a), the consumption of grains (nutrition #2b), and restricting the use of salt. One submitter provided a complex submission calling for further investigation into the evidence supporting statement 3. The Ministry has forwarded a full, unedited copy of the submission to the Technical Advisory Group (TAG) for its consideration.

For the physical activity statements, stakeholders wanted the Ministry to give daily examples of time rather than the weekly one, as people understand the implications of this better (pa #2). Stakeholders also wanted a move from time to intensity based exercise for weight loss (pa #3); and a recommendation for high intensity intermittent training (HIIT) which has evidence to reduce weight and cardiovascular disease risk, rather than additional aerobic activity (pa #3). One submitter provided a complex submission with suggestions on how the Ministry should word the statements, with particular reference to physical activity statement 3. The Ministry has forwarded a full, unedited copy of the submission to the TAG for its consideration.

Introduction

The Ministry's current *Food and Nutrition Guidelines Series*, and Physical Activity Guidelines, which provide evidence based food, nutrition and physical activity recommendations and relevant background information to health practitioners, will transition over time to become the *EAGS*.

In 2011, the Ministry of Health contracted Pam Oliver & Associates to undertake an independent evaluation of the *Food and Nutrition Guidelines Series* to determine if the Guidelines were meeting the needs of users and how they could be improved.

The evaluation findings showed the *Food and Nutrition Guidelines Series* are valued by many health practitioners, but some changes to their development process and format would strengthen them and make them more accessible to a wider audience. Based on specific recommendations from the evaluation the Ministry is planning to change over time from the *Food and Nutrition Guidelines Series* and separate *Physical Activity Guidelines*, to the new *EAGS*.

The *EAGS* will comprise of a core document with information including evidenced based statements, and numerous issue based documents, which can be added to and updated without needing to review the entire *EAGS*. This means that the Ministry can be more responsive to the needs of the health sector.

The core document will highlight key statements (health messages) for all New Zealanders based on available graded systematic evidence. The issue-based documents will support the core document and be produced over time depending on resourcing. Examples of issue based documents may include an educators guide for health practitioners; a food model based on revised portion sizes; health education resources for the public; and a series of issue based papers as prioritised by the Ministry that include food, nutrition and physical activity topics.

Method

The Ministry conducted a limited stakeholder consultation on the statements between 9 and 22 April 2014, with 23 external organisations and nine teams within the Ministry (which we have considered as one organisation for the purpose of this document). Of the 24 organisations, two forwarded the document to other organisations they work in close conjunction with, and who have an interest in nutrition and/or physical activity.

Key stakeholders were invited to make overall comments about the statements, and specific comments about individual statements. The submissions were analysed to identify common themes.

Results

The Ministry received 20 submissions, of which three came from individuals or groups identifying as Māori, and one from a group concerned with the health of Pacific peoples. One organisation concerned with the health of Asian Peoples was invited to submit comments, and although they showed interest in commenting, no submission was received.

Generally, the statements were well received and there were few comments that could be themed together. However, concerns were raised by more than one stakeholder group about the use of technical terminology throughout the document, the need to actively promote the statements to the general public in a concise way, the need for an overarching statement summing up the relationship between food (and alcohol), activity and health/well-being, and the need to consider all cultures and ethnicities in the statements.

Submitters made comments on individual statements, and detailed discussion can be found in the submissions analysis section of this document. The Ministry has summarised the information provided accordingly and has, as a consequence, removed some of the specific detail contained in the submissions.

The Ministry, in conjunction with the TAG, will address the suggested changes which are within the project scope and integrate them into the statements where appropriate. Some of the suggestions, whilst valid, are outside the scope of this document and accordingly will not be included in the revised statements.

Submissions

Submissions were received from the following organisations and individuals. The numbers here correspond to the submission numbers given in superscript after each comment in the document.

Submission	Organisation/individual	Submission	Organisation/individual
1	Auckland University of Technology (AUT)	11	Te Kete Hauora – Ministry of Health
2	Nutrition Foundation	12	Sport and Exercise Science New Zealand
3	Dietitians New Zealand	13	Cancer Society of New Zealand
4	Te Awakairangi Health Network	14	New Zealand Nurses Organisation
5	Sport New Zealand	15	Toi Tangata
6	Accident Compensation Corporation (ACC)	16	National Services Purchasing – Ministry of Health
7	Royal New Zealand College of General Practitioners	17	Disability Support Services – Ministry of Health
8	Fonterra Co-operative Group Limited	18	Community Health Service Improvement – Ministry of Health
9	Unilever Food Solutions New Zealand	19	New Zealand Food and Grocery Council
10	Heart Foundation Pacific Heartbeat	20	Exercise Association of New Zealand/AUT

Auckland University of Technology, Unilever Food Solutions New Zealand, The Royal College of General Practitioners, and the Exercise Association of New Zealand/AUT also included references supporting their views. Where evidence was provided a * has been put next to the submission number.

Submissions analysis

Overall nutrition statements

Submitters generally found the nutrition statements logical. Five submitters commented that the terminology was too technical and needs to be made easier to understand by using plain English.^{2, 3, 10, 13 & 14}

Further comments regarding the overall nutrition statements included:

1. that the target audience may not understand some words, sentences and ideas. The statements should be catchy, easy to remember, and focus group tested on end-users^{2, 3 & 14}
2. that the statements are fairly European focussed and do not take into consideration the variety of healthy and nutritious multicultural diets¹
3. that more emphasis is needed on the benefits of eating unprocessed wholefoods, particularly plants, and the avoidance of refined, highly processed foods¹
4. aligning the recommendations with National Heart Foundation guidelines on alcohol, fats and grains³
5. that more emphasis needs to be placed on planning regular home cooked meals, and eating in a relaxed environment with others³

6. that overall the guidelines are useful for Māori as they are used in decision making and messages for Kōhanga reo and marae, but that more behavioural suggestions such as eating together as a family could be included.¹⁵

Nutrition statement 1

“To be a healthy weight, balance your intake of food and drinks with your activity levels.”

Further comments regarding this statement included:

1. that the statement implies that weight can be managed as simply as ‘energy in equals energy out’. There are other metabolic factors that influence weight¹
2. that statements which allow people to freely choose the balance of fat and carbohydrate that suits, mainly from whole foods eaten in traditional meals, will have the best impact on energy balance¹
3. that contemporary evidence on the benefits of a high fat, low carbohydrate diet requires review¹
4. that healthy eating has many benefits rather than just healthy weight, so it would be preferable to start the statement with ‘enjoy a variety of foods’ as it is more positive and encompassing³
5. that this statement should go at the end of the eating statements: most people overestimate the effect of exercise and underestimate calorie intake, which has more effect on weight⁷
6. that people get confused, thinking if they exercise a lot, then they then can eat and drink a lot¹⁵
7. that healthy weight is influenced by factors other than food intake and activity levels¹⁵
8. that people may not understand the phrase ‘balance your intake...’¹⁵

Nutrition statement 2

“Enjoy a variety of nutritious foods every day [...]”

Further comments regarding this statement included:

1. that the statement should use the term ‘whole foods’ or ‘minimally processed food and drinks’ rather than ‘nutritious foods’^{2, 3 & 7}
2. inserting Māori concepts to make it meaningful i.e. kumara, kaimoana and including the other reasons why we need to eat this kai¹⁵
3. agreement on the statement for dairy and iron rich protein foods (statements 2c and 2d).³

Nutrition statement 2a

“Enjoy a variety of nutritious foods every day including [...] plenty of different coloured vegetables and fruit.”

Further comments regarding this statement included:

1. adding serving sizes to the guideline statement –
 - at least 7 servings per day of different coloured vegetables and fruit.
 - at least 3 of these servings should be leafy green vegetables and 3 of fruit, unless you are diabetic
 - each serving should be about the palm of a hand in size.⁷

Nutrition statement 2b

“Enjoy a variety of nutritious foods every day including [...] a range of grains and cereals that are naturally high in fibre.”

Further comments regarding this statement included:

1. that there is no evidence that grains protect against disease, and some risk that bran decreases the absorption of minerals, such as iron¹
2. that a range of grains and cereals naturally high in fibre need to be added³
3. a need to quantify how much grainy food is needed,³ and examples given^{2 & 10}
4. that the terms ‘fibre’, ‘bran’, ‘grains’ and ‘whole grains’ are hard to understand. Potential for ‘whole grain’ to be misleading and misused by food manufacturers^{3 &}
 - cereals seen as breakfast cereals (rather than whole grain cereals), so the exact meaning of this statement needs clarifying¹⁰
5. advising people to cut out all white refined foods such as white bread, white rice, biscuits and cakes^{1 & 7}
6. that almost all cereals except porridge and the most prickly bran cause blood sugar swings. Porridge, muesli or eggs make a better breakfast⁷
7. that legumes should be added to this group as they are high in fibre and can be eaten in larger quantities.¹⁹

Nutrition statement 2c

“Enjoy a variety of nutritious foods every day including [...] some low fat milk products and/or calcium-fortified milk alternative.”

Further comments regarding this statement included:

1. that scientific evidence shows that full-fat dairy products, and not low-fat milk, are protective against diabetes, cancer and cardiovascular disease, and that dairy fat does not contribute to obesity^{1 & 7}

2. that dairy fat is a source of vitamins not easily found in other foods and, like all fats, increases the absorption of the vitamins and antioxidants found in green vegetables; in fruits like tomatoes and capsicums,^{1 & 7} and in grains^{7 only}
3. that the statement needs to use plain English such as 'high calcium', 'added calcium' or 'yellow top milk' rather than 'calcium- fortified'^{7 & 10}
4. that milk and milk products make a significant contribution of essential nutrients to intakes in New Zealand, and are the richest dietary source of calcium⁸
5. that the statements should recommend limiting butter, hard margarine and lard and increasing the consumption of polyunsaturated fats such as margarines that are low in saturated and trans fats⁹
6. adding examples of milk, e.g. light blue top, green top, yellow top, knowing that, for example, Pacific people drink less milk and are probably calcium deficient¹⁰
7. that more information about alternatives to low fat milk products is needed.¹⁹

Nutrition statement 2d

"Enjoy a variety of nutritious foods every day including [...] some legumes, nuts, seeds, fish, eggs, lean poultry or lean red meat."

Further comments regarding this statement included:

1. recommending that people avoid industrially processed meat products^{1 & 7}
2. recommending that people eat meat no more than twice per week⁷
3. amending the wording to say 'with the fat cut off' rather than 'lean'⁷
4. recommending people eat two servings of legumes per day⁷
5. recommending that people don't avoid fatty cuts of meat in favour of lean muscle as it is wasteful and may be nutritionally inferior to a diet that also includes organs and other edible animal parts¹
6. a need to quantify proportions of food groups on each plate for dinner e.g. 1/2 plate of vegetables, 1/4 plate of rice, potatoes, taro, and 1/4 plate of meat with fat off⁷
7. that legumes should be added to nutrition statement 2b instead of 3a.¹⁹

Nutrition statement 3a

"Choose and prepare foods and drinks...with minimal fat, especially saturated fat; if you choose to add fat use plant-based oils and spreads."

Opinion on this statement was divided about whether the Ministry should be recommending the reduction in saturated fat or not.

Further comments regarding this statement included:

1. that the evidence shows saturated fat has little impact on the risk of cardiovascular disease^{1* & 7}
2. that there may be a protective effect of the various polyunsaturated fats gained from natural sources such as fish, nuts, seeds, meat, avocado and olive oil^{1*}
3. avoiding the fats (including polyunsaturated fatty acids) and non-traditional oils used in processed and deep fried foods¹
4. a request to just say 'oil based spreads' – remove the word 'plant based'¹³
5. that total fat intake is less important than fat type in relation to cardiovascular risk. The emphasis on this statement needs to be on replacing saturated fat with healthier varieties especially omega 3, fish, flax and nuts as promoting low fat can result in consumers replacing saturated fat with simple carbohydrate^{2 & 3}
6. that the Ministry should place less emphasis on total fat intake, and more emphasis on reducing saturated fat and increasing polyunsaturated fat intake^{9 & 11}
7. that this guideline is inconsistent with the Dietary Guidelines for Australians, Americans and Canadians
 - the risk of Cardiovascular Heart Disease is reduced when Saturated Fatty Acids (SFAs) are replaced with polyunsaturated fatty acids (PUFAs)
 - that no clear benefit of substituting carbohydrates for SFAs has been shown, although there might be a benefit if the type of carbohydrate replacing SFA is unrefined and has a low glycaemic index⁹
8. that this statement needs to be supported with something about label reading, i.e. how to tell what minimal fat or saturated fat is^{9 & 15}
9. why the Ministry recommends increased consumption of unsaturated fat and reduced consumption of saturated fat¹⁵
10. recommending the words are changed to 'if adding oil or fat, choose those that are plant based and high in monounsaturated or polyunsaturated fats'¹⁹
11. that a statement acknowledging the place of high fat, high sugar treats is needed¹⁹
12. the inclusion of some guidance around treats as the current statement is spartan and unrealistic – use words like 'being selective', 'occasionally' and 'rarely' e.g. 'keep treats special, have only once a week'.¹⁹

Nutrition statement 3b

"Choose and prepare foods and drinks [...] low in salt (sodium); if using salt, choose iodised salt."

Further comments regarding this statement included:

* Embedded AUT document

1. that restricting salt without making other diet and lifestyle changes only lowers blood pressure slightly, and may increase the risk of health problems^{1 & 7}
2. that the average intake of sodium in New Zealand has been estimated at 3900mg per day, a level within the range indicated as having no effect on death or disease risk (between 2,645 and 4,945 mg)¹
3. that 10 percent of hypertensive patients have salt sensitive hypertension; a low salt diet in non-hypertensive people is more likely to increase their blood pressure than decrease it⁷
4. a need to quantify what “low in sodium” is¹²
5. that this statement is not backed by good evidence
 - that processed food includes a lot of salt and is not recommended
 - that an alternative source of iodine such as kelp could be eaten daily⁷
6. changing ‘if’ using salt, to ‘when’ using salt.¹⁶

Nutrition statement 3c

“Choose and prepare foods and drinks [...] with little or no added sugar.”

There were no objections to this statement. One submitter expressed their support for this guideline statement as a high consumption of added sugars is strongly associated with heart disease, type 2 diabetes, tooth decay and obesity.

Further comments regarding this statement included:

1. that it would be useful to separate out the drinks statement into its own statement i.e. choose and prepare drinks with little or no added sugar¹⁵
2. that the Ministry needs a recommendation to limit processed foods high in sugar, and that highly refined starches may be similar to sugar in their metabolic effect.¹

Nutrition statement 4

“Make water your first choice for drinks.”

Seven submitters explicitly agreed with this guideline statement and no submitter objected to the guideline statement.

Further comments regarding this statement included:

1. that 'low fat milk' should be added as an alternative drink to water¹²
2. that emphasis on water should be stronger/higher up the statements^{3 & 7}
3. emphasising that tap water is safe to drink and quantify the amount needed⁷
4. recommending avoidance of all concentrated fruit juice soft drinks, even those labelled ‘diet’ or ‘zero’⁷

5. that making water the first choice is sensible, but the person needs to ensure that drinking water from their tap is safe, or that they have a reliable water supply (which can be an issue in smaller communities)¹¹

Nutrition statement 5

“Buy, prepare, cook and store food to ensure food safety.”

Further comments regarding this statement included:

1. quantifying time,^{2, 7, & 11} temperature and the ‘four C’s’¹⁰ for clarity – reword the statement to “keep food safe by being aware of time and temperature when buying, preparing, cooking and storing food”
2. that more information is needed about ‘how’ food safety may be achieved⁷
3. that cultural context needs including – ‘buying’ makes an assumption about how people obtain kai. There are many food safety aspects from a Māori perspective, such as how a person gathers their kai (e.g. gathering watercress, fishing hunting) that should be included¹⁵
4. that links to further information on how to follow this statement should be provided.¹⁶

Nutrition statement 6

“If you drink alcohol, keep your intake low. Don’t drink if you are pregnant or planning to become pregnant.”

Further comments regarding this statement included:

1. quantifying what the term ‘low’ means^{2, 3 & 10}
2. that some cultural relevance should be included in this statement. The current tagline of the ad on Māori TV – Te Matarae i Orehu promoting this message is really good - i.e ‘kai mau ki tou mana- tai hoa ake i te waipiro’¹⁵
3. replace ‘don’t drink’ with ‘avoid all alcohol’ for pregnant women¹⁹
4. the Ministry should add that breastfeeding mothers should also avoid alcohol.¹⁶

Overall physical activity statements

Eleven submitters made a comment about the physical activity guideline statements overall. Submitters found the guidelines useful, and were pleased that the concept of exercise intensity has been incorporated into these guideline statements, but questioned the time based recommendations for weight loss. Two submitters liked the physical activity section^{7 & 10}. Five submitters commented that the terminology was too technical and needs to be replaced with plain English.^{2, 3, 10, 13 & 14}

Further comments regarding the overall physical activity guideline statements include:

1. combining statements 2 and 3³

2. more detail about the 'extra health benefits' and including household activities such as vacuuming, gardening etc. would be good¹⁰
3. that if the person has been physically inactive for some time, are just starting out, or have certain health conditions, they may wish to consult a health practitioner or physical activity specialist to ensure their safety before starting⁴
4. that it is important the physical activity section has included draft 'why and how' explanations¹⁰
5. that the statements need more detail¹¹
6. that daily amounts of physical activity are easier to understand than weekly ones.¹⁴

Physical activity statement 1

"Sit less, move more! Reduce sedentary behaviour and break up long periods of sitting."

Further comments regarding this statement included:

1. that a guideline specifically around reduction of total sitting time is important²⁰
2. that movement is essential to health and wellbeing^{4, 7 & 20}
3. that the term 'sedentary behaviour' should be replaced with something more easily understood^{18 & 19}
4. that more information is needed on why sedentary behaviour is a risk¹⁶

Further comments regarding examples given in physical activity statement 1 included:

5. that additional examples could be given for the how and why section including:
 - at home:
 - additional examples of sedentary pastimes such as being on the computer, reading, watching TV or playing electronic games³
 - limiting screen time to less than two hours per day
 - at work:
 - standing up and take a break from sitting at least every 30 to 60 minutes
 - doing household chores standing, such as folding clothes, washing dishes or ironing, while watching television
 - standing desks in the workplace²⁰
 - using stairs instead of lifts^{6 & 20}
 - standing to answer the phone or check texts/emails
 - walking to a colleague's desk rather than phoning or emailing them
 - out and about:
 - parking the car further away from the destination and walking the rest of the way (often cheaper or free parking as well)
 - standing to greet visitors

- walking or cycling at least part way to the destination
- standing on public transport
- getting on/off public transport one stop/station earlier.⁴

Physical activity statement 2

“Do at least 150 minutes (2½ hours) of moderate-intensity or 75 minutes (1¼ hours) of vigorous-intensity physical activity spread throughout the week.”

Further comments regarding this statement included:

1. that the definitions of moderate and vigorous intensity need simplifying, e.g. by using the ‘talk test’^{3, 5, 11 & 12}
2. that using the phrase ‘30 minutes a day’ is better than using minutes or hours as people are more familiar with this message^{3 & 7}
3. that people may not understand the definitions of moderate- and vigorous-intensity physical activity.¹⁹

Physical activity statement 3

“For weight management and extra health benefits, aim to do at least 300 minutes (5 hours) of moderate- or 150 minutes (2½ hours) of vigorous-intensity physical activity spread throughout the week.”

Further comments regarding this statement included:

1. objections about time-based recommendations for weight loss. The time-based activity recommendations assume that greater total exercise duration is a legitimate and independent strategy for reducing weight. Evidence does not support this, at least evidence that would be considered robust enough to make public health recommendations^{20†}
2. that high intensity intermittent training (HIIT) has evidence to suggest it is a time-efficient and well-tolerated method to reduce weight and cardiovascular disease risk^{12 & 20}
3. that vigorous intensity exercise is more time efficient than moderate intensity exercise if finding time to exercise is a barrier^{4 & 12}
4. the combined importance of diet as well as physical activity for weight loss²⁰
5. that ‘extra health benefits’ need defining
 - add Green Prescriptions as an example
 - put in a recommended amount of time.¹⁹

Physical activity statement 4

“Include some muscle- and bone-strengthening activities on at least two days per week.”

† Embedded EAoNZ/AUT document

Further comments regarding this statement included:

1. that you don't need a hyphen after 'muscle' or 'bone' strengthening¹⁸
2. changing 'per' to 'each'.¹⁸

Further comments regarding examples given in physical activity statement 4 included:

3. that resistance training can be performed in a variety of settings, but the activities probably do not meet minimum threshold loading for adequate training^{11 & 20}
4. There are many home-based, or local environment options to include²⁰
5. that some of the examples are obscure or not accessible to lower income groups – use examples like lifting heavy items, gardening etc.^{18 & 19}
6. that some examples are needed in the short version of the statements¹⁹
7. that additional examples could be given for the how and why section including:
 - activities that use weights, and/or body weight as resistance e.g. press ups, squats, lunges, crunches, machine weights at the gym, handheld free weights etc.
 - using household items if you don't have proper weights e.g. cans, old bottles filled with water, bags of potatoes etc.
 - combining strengthening/resistance activities into your moderate or vigorous intensity cardiovascular exercise
 - aiming for two to three sets of 10 to 20 circuit reps. Aim to do each exercise for 30 seconds to 1 minute at a time⁴

Physical activity statement 5

"If you currently do no physical activity, start by doing some activity, and then build up to the recommended amount."

Further comments regarding this statement included:

1. reordering of the statements so this one is second in the physical activity list³
2. that as neither statement 3 or 4 are referred to as 'the recommended amount' rephrase physical activity statement 5⁵
3. changing the wording to 'doing any physical activity is better than doing none'¹⁸
4. including a safety message.¹⁸

Further comments regarding examples given in physical activity statement 4 included:

5. amending the statement so it reads 'walk or cycle to places you might normally drive to – you might be able to walk to work, a friend's house, your church, your community centre or marae'^{11 & 16}
6. expanding and identifying active jobs³
7. removing the word 'consider' as it is not part of the activity¹⁸

8. increasing the emphasis on fun activities that a person wants to keep doing¹⁸
9. increasing the emphasis that these activities do not have to be done in one go¹⁸
10. removing 'hinengaro' as it is not a Māori term that is used in everyday language¹⁹

Summary of key findings

The submissions received from the consultation on the *Eating and Activity Guideline series* statements were varied, but many of the results could be summarised under the following:

1. Overall:

- use plain English
- the statements are fairly European focused and don't take into consideration the variety of healthy and nutritious multicultural diets
- incorporate everyday Māori terminology where appropriate
- include an overarching statement summing up the relationship between food, activity and health/well-being
- include some behavioural suggestions i.e. eat together as a family, exercise with friends, play with children/grandchildren
- quantify recommendations – what is a healthy weight (nutrition #1), how much is 'low' when referring to alcohol (nutrition #6), how many servings of vegetables and fruit per day (nutrition #2a) how much is 'low in salt' (nutrition #3c), move every hour and limit screen time (pa #1), how much time is needed for muscle and bone strengthening (pa #4).

2. Nutrition statements:

- conflicting evidence/opposing views about the harm/benefit of diets high in saturated fat (nutrition #3a), the consumption of grains (nutrition #2b), and restricting the use of salt (nutrition #3b)
- more emphasis is needed on recommending increased consumption of unprocessed wholefoods and decreased consumption of processed foods
- advice for people to cut white refined foods is needed (nutrition #2b)
- that cereals are interpreted as meaning 'breakfast cereals', most of which are unhealthy and cause blood sugar swings (nutrition #2b)
- emphasising tap water is safe to drink in most places and that you don't need to buy bottled water (nutrition #4)
- include 'gather' in the statement as how you gather kai is also a key aspect of food safety – is the stream you are gathering watercress from clean? harvesting, hunting, fishing etc (nutrition #5).

3. Activity statements:

- needs more information on why sedentary behaviour is a risk (pa #1)
- include information on the 'talk test' (pa #2)
- give daily examples of exercise time rather than the weekly one as people understand the implications better (pa #2)
- move from time to intensity based exercise for weight loss (pa #3)
- high intensity intermittent training (HIIT) has evidence to reduce weight and CVD risk. It's about exercising smarter rather than longer (pa #3)

- the combined importance of diet as well as physical activity for weight loss (pa #3)
- vigorous intensity activity is more time efficient than moderate intensity activity
- activities may not meet minimum threshold for adequate training (pa #4)
- put physical activity statement #5 further up so it is in sequence.

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4. Length and complexity of statements:

- nutrition statement #5 and pa statements #2 and #3 need to be simplified
- the nutrition statements should use 'whole foods' or 'minimally processed food and drinks' rather than 'nutritious foods' as the public will find this easier to understand
- replace the words 'sedentary behaviour' and 'moderate/vigorous intensity activity' with easier to understand terms.

Next steps

The analysis of submissions will be used to inform the Technical Advisory Group about what stakeholders would like changing and will be considered when the Ministry finalises the statements.