

Consultation on draft guideline – deadline for comments 5pm on 28/1123

email: weightmanagement@nice.org.uk

Checklist for submitting comments

- Use this comments form and submit it as a **Word document (not a PDF)**.
- **Do not submit further attachments** such as research articles, or supplementary files. We return comments forms that have attachments without reading them. You may resubmit the form without attachments, but it must be received by the deadline. You are welcome to include links to research articles or provide references to them
- Complete the disclosure about links with, or funding from, the tobacco industry.
- Include **document name, page number and line number** of the text each comment is about.
- Combine all comments from your organisation into 1 response form. **We cannot accept more than 1 comments form from each organisation.**
- **Do not** paste other tables into this table – type directly into the table.
- Ensure each comment stands alone; **do not** cross-refer within one comment to another comment.
- **Clearly mark any confidential information or other material that you do not wish to be made public with underlining and highlighting. Also, ensure you state in your email to NICE, and in the row below, that your submission includes confidential comments.**
- **Do not name or identify any person or include medical information about yourself or another person** from which you or the person could be identified as all such data will be deleted or redacted.
- Spell out any abbreviations you use.
- **We do not accept comments submitted after the deadline stated for close of consultation.**

Note: We reserve the right to summarise and edit comments received during consultations, or not to publish them at all, if we consider the comments are too long, or publication would be unlawful or otherwise inappropriate. Where comments contain confidential information, we will redact the relevant text, or may redact the entire comment as appropriate.

Comments received during our consultations are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the comments we received, and are not endorsed by NICE, its officers or advisory Committees.

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	<p>Please read the checklist above before submitting comments. We cannot accept forms that are not filled in correctly.</p> <p>We would like to hear your views on the draft recommendations presented in the guideline, and any comments you may have on the rationale and impact sections in the guideline and the evidence presented in the evidence reviews documents. We would also welcome views on the Equality Impact Assessment.</p> <p>In addition to your comments below on our guideline documents, we would like to hear your views on these questions. Please include your answers to these questions with your comments in the table below.</p> <ol style="list-style-type: none"> 1. Would it be challenging to implement of any of the draft recommendations? Please say why and for whom. Please include any suggestions that could help users overcome these challenges (for example, existing practical resources or national initiatives). 2. Would implementation of any of the draft recommendations have significant cost implications? 3. [Insert any specific questions about the recommendations from the Developer, or delete if not needed] <p>See Developing NICE guidance: how to get involved for suggestions of general points to think about when commenting.</p>
<p>Organisation name (if you are responding as an individual rather than a registered stakeholder please specify).</p>	<p>First Steps Nutrition Trust</p>
<p>Disclosure (please disclose any past or current, direct or indirect links to, or funding from, the tobacco industry).</p>	<p>Nothing to declare</p>
<p>Confidential comments (Do any of your comments contain confidential information?)</p>	<p>Yes/No [please delete as applicable]</p>
<p>Name of person completing form</p>	<p>Victoria Sibson</p>

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Comment number	Document [e.g. guideline, evidence review A, B, C etc., methods, EIA]	Page number 'General' for comments on whole document	Line number 'General' for comments on whole document	Comments <ul style="list-style-type: none"> • Insert each comment in a new row. • Do not paste other tables into this table, because your comments could get lost – type directly into this table. • Include section or recommendation number in this column.
1	Guideline	General	General	<p>The guideline does not address the known effect of marketing on food/drink choices. In our view it would be appropriate to make explicit in appropriate places throughout that actions to help address obesity should include 1. restrictions on the inappropriate advertising of specific foods and drinks which are drivers of overweight and obesity, and 2. messaging to health care professionals and the public who are intended users/beneficiaries of these guidelines to be circumspect of food/drink marketing, such as health and nutrition claims on labels. Specific foods and drinks of concern would include high fat, salt and/or sugar foods/drinks as identified by the Ofcom Nutrient Profile Model and inappropriate foods and drinks marketed for infants and young children as identified by the WHO Europe Nutrient Profile and Promotion Model. It should be noted that there are examples of local authorities who are implementing such marketing restrictions already. Examples of where this recommendation would be relevant are pages 14, 21, 94-96, 117, 119.</p>
2	Guideline	General	General	<p>The guideline does not make reference to the Healthy Start scheme which certain low income families with babies under 1 and children aged 1 to 4 years of age are eligible for. This is relevant to the prevention and management of obesity in women in the post-partum phase and for children aged 1-4 as the scheme is meant to enable access to foods which can form the basis of a healthy diet. It is particularly important in the current cost of living crisis given the rising food inflation and because food insecurity is a driver of overweight and obesity. Suggest consider mentioning in appropriate places.</p>
3	Guideline section 1.2.22-1.2.29	17-19	General	<p>It is appropriate to see the Early Years Settings Statutory Framework referenced, and within this there is guidance for food provision. However, recent research highlights issues with this guidance that need addressing, and calls in to question to feasibility of its implementation without further resourcing. See Shining a light on early years nutrition: The role of councils Local Government Association. We feel that these factors ought to be acknowledged so that users of this guideline can take appropriate steps to address them, including providing financial support to settings as needed. The report also gives examples of best practice which could be shared to facilitate implementation.</p>
4	Guideline section	17-19	General	<p>SACN guidance on feeding young children aged 1-5 years reported evidence that larger portion sizes of snacks and meals provided in preschool settings are associated with higher food and energy intakes in the short term (less than 6 months). Could this be used to make a specific recommendation</p>

Weight Management: preventing, assessing and managing overweight and obesity (update)

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	1.2.22-1.2.29			about portion sizes offered in early years settings in addition to referring to the EYS statutory framework?
5	Guideline section 1.5.58	58	General	As has been done in other places in the guidelines, suggest making explicit that child care may be required for some families to make their participation possible (as per wording in 1.10.18 on page 85 “If possible, provide affordable childcare (for example, a creche) and provision for breastfeeding”.)
6	Guideline section 1.10.11	83	General	Consider reframing this point to counteract misleading messaging that commercial milk formula companies convey to women from pre-pregnancy and beyond; i.e. To state that a special diet is not needed to support breastfeeding. Consider also sharing explicitly that breastfeeding can facilitate return to pre-pregnancy weight.
7	Guideline	134	Lines 15-16	Is there a reason those that have been found to be effective are not mentioned in the guidelines? On page 103 the guidelines list evidence based interventions for adults (Slimming World and Weight Watchers). Is there a reason that evidence based interventions for children are therefore not included? An example of an evidence based intervention for pre-school children with sustained impact is: Planet Munch Healthy Lifestyle Programme - tackling childhood obesity through creative education NICE
8	Guideline	General	General	There is no mention among the relevant practitioners of midwives anywhere in the guideline and there should be with respect to the recommendation relevant to supporting pregnant/post partum women.

Insert extra rows as needed

Data protection

The information you submit on this form will be retained and used by NICE and its advisers for the purpose of developing its guidance and may be passed to other approved third parties. Please do not name or identify any individual patient or refer to their medical condition in your comments as all such data will be deleted or redacted. The information may appear on the NICE website in due course in which case all personal data will be removed in accordance with NICE policies.

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