

Building a Communication Strategy for a Public Comment Period

Public comments are a written submission from individuals, organizations or the public in response to a proposed policy, rule or regulation. They are part of a formal comment period, often 30-90 days, after which comments are reviewed by decision-makers and considered before final decisions are made. The primary goal in the policymaking process is to provide input for the record, making sure citizens participate in the process (which may be required by law).

Public comment periods are critical moments in an advocacy campaign to strategically use a combination of earned, owned and paid media to influence decision-makers and shape public narratives through detailed analysis of or support for the policy. They also present a valuable opportunity to activate the networks you've been building—demonstrating broad support, shaping the policy, driving participation and increasing pressure for policy change. This guide outlines the steps for building a submission strategy during public comment periods.

Overview of Steps

Step 1: Define Your Strategy

Step 2: Map Persuasive Arguments

Step 3: Develop Tactics for Grassroots and Grasstops Advocacy Based on Submission Strategy

Step 4: Track Comment Submission and Revise Your Strategy as Needed

1 Define Your Strategy

Your goal for any public comment period is to demonstrate support for a best-practice policy or opposition if otherwise. You first need to decide if your submission strategy is to emphasize **quality** or **quantity** or both.

Your decision is based on how the decision-makers will be using the public comment period. Are they soliciting technical feedback on the policy, counting support for the policy or both? You'll also need to know who they are soliciting feedback from—is it from specific experts, specific sectors, specific regions or the general public?

A **“quality”** approach to submissions—whether from individuals, organizations or coalitions—emphasizes knowledge and credibility and typically includes an in-depth rationale for why the policy should be passed.

Purpose	How it Helps
Provide a credible, in-depth rationale for the policy and/or counter industry claims	Builds trust with decision-makers by showing deep understanding and clear justification for the proposed policy and countering industry experts' claims.
Elevate the voices of those most affected	Brings authenticity and moral weight to the submission by showing real-world impact and lived experience.
Showcase organizational or expert backing	Signals that the submission is grounded in evidence, experience and public interest, not just opinion.
Demonstrate support through joint submissions	Highlights coalition strength and shows that diverse groups are aligned behind the policy change.

A **“quantity”** approach to public comment submissions is about generating a high volume of submissions—often from members of the public, allied organizations or grassroots networks—to demonstrate widespread support for a policy. It's less about in-depth argumentation and more about political pressure and/or meeting a requisite legal or constitutional threshold through visible public engagement.

Purpose	How it Helps
Demonstrates public support	Shows policymakers that constituents care and are watching. Assumes the communication fulfills its mandate to provide objective education and information on the subject.
Counters industry narratives	Offsets opposition “astroturf” campaigns claiming public resistance.
Builds grassroots power	Empowers individuals and groups to take part in policy change.
Media leverage	“Hundreds of parents support...” can be a useful media message and can help change narratives of opposition.

Best practice is to combine both approaches. Use a quality submission from an organization or expert voice and pair it with a quantity push from the public or partners. Together, they show both informed reasoning and public demand.

Quantity Approach	Quality Approach
Broad participation	Depth of argument
Fast to mobilize	More effort to draft
May be dismissed as “form letters”	Often seen as more credible
Political pressure	Policy persuasion

2 Map Persuasive Arguments

Once you know whether you will use a quantity, quality, or hybrid submission strategy, you can map which arguments will be most effective in strengthening and/or demonstrating support for the policy. You can also determine which voices will be the most impactful messengers. Your arguments could outline why the policy will solve the problem at hand, as well as opportunities for strengthening the policy (if applicable).

If you are pursuing a **quantity** approach, you may consider developing a sample submission to help the public align on messaging. For a **quality** approach, you should consider the following:

- Aligning with key government allies on which messages to prioritize.
- Reviewing comments among the coalition, determining who is playing which role, whether there should be individual comments or a joint submission.
- Determining whether global audiences (including but not limited to GHAI) should be engaged in the process, and what experiences/case studies should be highlighted.
- Obtaining comments from nearby countries, countries within trade blocs or spheres of influence, countries which have had success with the particular policy, etc. (as appropriate).

Contact GHAI for examples of submissions from other countries.

3 Develop Tactics for Grassroots and Grasstops Advocacy Based on Submission Strategy

Driving meaningful change requires a dual approach: directly engaging decision-makers to take action (grasstops), while simultaneously mobilizing the public to create pressure from the ground up (grassroots). Your tactics will depend on your comment submission strategy.

GRASSTOPS: Leveraging Decision Makers and Opinion Leaders as Influencers

Engaging decision-makers and opinion leaders in the public comment period can lend credibility to your ask and speak to experiences from other countries, showing breadth of support.

Examples:

- Explore letter of support by health care professionals, doctors, and health organizations that could be distributed to media.
- Use the credibility of national and international experts to put pressure on decision-makers (e.g. doctors, UNICEF, Marion Nestle).
- Develop social media cards featuring images and quotes from prominent persons talking about why we should support the policy.
- Ask prominent persons to share their support via their own digital channels, possibly tagging decision-makers.

GRASSTOPS: Generating Traditional Media Coverage

You can sway opinion among decision-makers and the public leading up to, during, and after the public comment period by generating media coverage. This should complement your steady drumbeat of media coverage about why the policy is needed.

Examples:

- Aggressive media outreach to promote studies/research, public opinion polls in support of the policy, etc. Amplify these efforts on digital media channels.
- Press conference with global and national public health experts to discuss benefits of the policy with media. If it will be hard to garner media participation for a press event, you can also explore setting up one-on-one interviews while the global experts are in the country.

GRASSROOTS

Raising awareness among the public about the public comments allows you to activate networks to submit comments, with the goal of demonstrating public support for the policy.

Examples - Generating Awareness and Mobilizing Public Comment

Submission:

- Live event where people can get information about the policy and submit a

comment in real-time. (e.g. Create an interactive experience for the public that demonstrates the need for the policy, like trying to guess the FOPWL different foods would have, etc – Contact GHAI for examples).

- Hold small, regional information events all over the country to get more comments. Leverage existing events where an aligned audience is likely to be attending (e.g. a farmers market).
- Drive submissions in the public comment period
 - Online countdown to the public comment phase, paired with messaging about its importance in the policy process.
 - Template letters or online forms that auto-generate submissions.
 - Social media call-to-actions linked to submission portals. See [some examples here](#).

4 Track Comment Submission and Revise Your Strategy as Needed

If possible, tracking which communications activities drive submissions can be a great way to pivot your strategy as needed to determine what is successful and what is not. For example, did you see an increase in submissions after you did a radio interview? That could mean your grassroots efforts with traditional media can drive submissions. If you see an increase in comments when you didn't have any activities planned, that could be driven by industry's counterefforts. In our experience, GHAI has found that in-person events engaging the public yield more submissions than online requests. We have also observed positive outcomes from direct engagement through your own distribution channels (email and/or WhatsApp), as these audiences tend to demonstrate higher levels of engagement.

For example, in Brazil, Idec's communications team tracked the daily increase in submissions in the official submission portal against their own communications activities to better understand in real-time which tactics were most effective.

Contact GHAI for examples of tracker templates.