

Writing Effective Public Comments

A guide for Industry, Academia, and Stakeholders

Before you get started

Find a proposed rule of interest at: <https://www.regulations.gov/>

1. Familiarize yourself with the proposed rule.
2. Gather necessary documents to support your points.
3. Look over comments previously submitted to the docket.

Who can submit a comment?

Anyone! Any person (individual, group, organization) can make a public comment.

Participate!

Check with your trade association, company, commodity group, or others in your field to see if they plan to submit a comment. You may be able to submit a joint comment or provide input on what they are submitting.

Getting Started



Comments can be submitted anonymously; however, it may be in your best interest to establish your expertise or understanding of the issue by providing your name and or position (i.e., "20 years experience in leafy greens", or "consultant in sanitation practices")



Clearly explain what aspects of the proposed rule you are FOR or AGAINST and why. Examples of this may look like citing another rule, regulation, or guidance, a copy of an article, or a study that supports your point.



Point out specific aspects, requirements, or logistics of the rule that you like or do not like. The clearest comments tend to be when a specific citation from the proposed regulation is included.



General Example:

Thank you for the opportunity to comment on [document title] [docket #]. I am [introduce yourself and credentials or expertise].

I would like to provide comment/concern/praise to the proposed regulation [insert regulation and specific text that you want to comment on].

[Follow each comment or concern with a suggested change to the language in the regulation].

Resources:

FDA guide to submitting comments:

<https://www.fda.gov/patients/guide-submitting-comments-fda>

Importance of Public Comment to the FDA:

<https://www.fda.gov/drugs/information-consumers-and-patients-drugs/importance-public-comment-fda>

Regulation.gov FAQ on commenting (halfway down the page):

<https://www.regulations.gov/faq>

Regulation.gov, where you can search for the rule or docket #:

<https://www.regulations.gov/>

The Public Comment Project provides resources to assist in effective comment writing including templates and examples:

<https://publiccommentproject.org/how-to>