



ACP Higher Education Committee
STATEMENT ON OPEN ACCESS PUBLISHING OF PUBLICLY FUNDED RESEARCH
20 August 2014

The Higher Education Committee of the Association of Canadian Publishers (ACP) has taken note of the draft Tri-Agency Open Access Policy released in October 2013 by the Canadian Institutes of Health Research (CIHR), the Natural Sciences and Engineering Research Council of Canada (NSERC), and the Social Sciences and Humanities Research Council of Canada (SSHRC). The Committee appreciates the consultation undertaken by the Tri-Agency group and looks forward to reviewing the final policy when the agencies release it later this year.

The Committee views with concern the trend to equate public funding for research with the right to public access to published versions of the research to which value has been added. When public funding for research does not include funding for publication itself, or make provisions for the recovery of those costs through sales, publication becomes insupportable, and both researchers and their audiences suffer.

The Committee has also read with interest "Open Access and the ASPP," the draft policy position regarding the Awards to Scholarly Publications Program (ASPP) prepared by the Federation for the Humanities and Social Sciences (the Federation) and released in May 2014. The ASPP is administered by the Federation and funded by SSHRC.

The Committee is encouraged that the draft ASPP policy notes:

- 1) "The discussion on Open Access and journals is important, but it is not sufficient to inform the discussion on Open Access for scholarly books" (p3);
- 2) "[A]dopting a mandatory Open Access policy for the ASPP could lead to serious and unpredictable effects on Canadian scholarly publishing, and may even threaten the viability of some presses" (p4); and
- 3) "Because of the lack of evidence on the effect of Open Access on scholarly book publishing, and the importance of a vibrant scholarly publishing industry to the Federation and its members, the Federation proposes it incentivize, not mandate, Open Access for ASPP-funded books." (p4)

The Higher Education Committee of ACP has also reviewed the open letter of 13 December 2013 on open access by John Yates, President of the Association of Canadian University Presses (ACUP); the paper released by ACUP in January 2014, "Monograph Publishing in an Open Access Context;" and John Yates's letter on behalf of ACUP of 9 June 2014 responding to the request from the Federation for input on the draft ASPP policy.



The Higher Education Committee of ACP endorses both 1) the qualified support expressed by ACUP for open access publishing of publicly funded Canadian research and 2) ACUP's assessment of the issues related to open access publishing that need to be addressed to avoid damage to scholarly publishing in Canada and unintended harm to the broad dissemination of publicly funded Canadian research. The Committee notes that the potential of harm may be especially high for publishers of Canadian research that do not receive operating funding or support from a university or college.

The Higher Education Committee of the ACP also strongly supports the flexible, incremental, voluntary, incentive-based approach proposed by the Federation for open access publishing of ASPP-funded books. The Committee recommends that such an approach should serve as a model for open access publishing, in preference to any mandatory approach or any approach that fails to recognize and provide for the real costs of publishing.

The Committee emphasizes further:

- 1) That an embargo-based policy carries significant risks. The Committee agrees that longer embargos would be preferred especially for monographs (ACUP proposes 36 months) and for other works with long lives in publication, such as materials used in instruction. It notes that the effects of embargos on cost recovery have so far not been tested, and that even long embargos may motivate purchasers to wait for open access, making it impossible for publishers to recover costs.
- 2) That any requirement for open access that shifts publication costs to researchers will either reduce their capacity for research by requiring them to redirect their funding, or force them to cover publication costs personally. Creating barriers to publication of the work of lower-income researchers would be an unacceptable and unintended consequence of open access policies.
- 3) That the overall success of an incentive-based approach to open access will depend on the level of the incentive, and the number of titles supported. We look forward to research-based trials of open access policy that carefully monitor and evaluate impacts before any wholesale changes to the ways in which publicly funded research is now published.

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