Opening Canadian Research to the World
Summary of Responses to Draft Tri-Agency Open Access Policy Consultation

Spring 2014

Introduction

Between October and December 2013, the Natural Sciences and Engineering Council of Canada (NSERC) and the Social Sciences and Humanities Research Council of Canada (SSHRC) ("the Agencies") held an online consultation on a [Draft Tri-Agency Open Access Policy ("the policy")](). The draft policy is modeled after the Canadian Institutes of Health Research's (CIHR) Open Access Policy, which remains unchanged and continues to be mandatory. We received 201 submissions from various stakeholders, including researchers, post-secondary institutions, libraries, non-governmental organizations, scholarly associations, journals and journal publishers from Canada and abroad (see Appendix A for a breakdown of respondents).

This report summarizes what we heard during the consultation. It represents the feedback from the 201 respondents, and identifies, where applicable, areas that were of special interest to particular groups of respondents.[1] The respondents' feedback and interests are summarized into the following themes:

    Theme 1:   General Remarks
    Theme 2:   Publication Choice and Impact on Research Careers
    Theme 3:   Approaches to Open Access (OA)
    Theme 4:   Implications for Journals and Associations
    Theme 5:   Implications for Researchers

We wish to thank everyone who took the time to share their views. All comments will be helpful in drafting and implementing a final policy that considers the needs and concerns of the research community and other stakeholders in an evolving open access landscape.

Theme 1: General Remarks

A number of respondents commented on the principle and rationale of the policy, and its scope and compliance requirements.

Open Access Policy – Principle and Rationale

Overall, there is clear support for the principle of the policy: that publications resulting from publicly-funded research should be made publicly available. One tenth of respondents questioned the need for the policy, noting that journal publications are already available to anyone who needs access to them. Of these respondents, some expressed concern over mandating open access across all disciplines, stating that disciplines often have their own unique publishing cultures (see Theme 3). Separately, several respondents suggested that the policy include a clearer definition of "open access".

---

[1] There is some crossover between stakeholder communities. For example, many scholarly associations publish a not-for-profit journal, and journal editorial board members are often active researchers.

Policy Scope

Avery small number of respondents suggested that the policy, either immediately or eventually, be broadened to include publication-related research data, as is the case with CIHR's Open Access policy. Furthermore, a few respondents recommended including other forms of published research output, such as monographs, book chapters, reports, editorials and conference proceedings in the policy scope.

Compliance

Various respondents asked whether compliance would be mandatory and how it would be monitored. Several respondents questioned if the policy would apply to graduate students, post-doctoral fellows and research teams with unfunded collaborators, and how the policy would apply to doctoral students who publish their theses as a collection of papers.

Some respondents said that it would be difficult for researchers from smaller institutions to comply with a digital archiving requirement because smaller universities do not always have a repository. Other respondents anticipated this concern and noted that some universities allow repository deposit by researchers from other universities.

> *What we heard:*
>
> *"This policy will bring many institutional benefits, including the likelihood of increased citation rates and download rates to our faculty's publications."* (University Library)
>
> *"While the idea of open access is a worthy principle, it comes with considerable economic, logistical, and intellectual implications. The proposed policy looks like it will substantially reshape scholarly publication in the Humanities and Social Sciences in Canada, and not particularly for the better."* (Researcher & Journal Editor)
>
> *"In general, this draft policy is well received and is seen as an advance in facilitating access to research publications. Concerns lie in its foreseeable effect on publication costs which researchers will have to cover."* (Institution)

Theme 2: Publication Choice and Impact on Research Careers

Many respondents expressed concern over the impact of the policy on publication choice and research careers. These concerns were particularly prevalent among researchers, faculties and departments, universities and university research offices.

Publication Choice

Respondents were concerned that the proposed policy would limit researchers' ability to publish in the journals of their choice. Of these respondents, approximately a fifth perceived open access journals are low impact and/or low quality, and that journals of choice do not allow open access, even after 12 months. Approximately one-third of researcher respondents suggested that top-tier journals are not open access and/or do not permit repository deposit.

Research Careers

Of the respondents who indicated that the policy would limit their publishing options to low impact, low quality journals, many worried that the policy could negatively affect their research careers, whether in applying for tenure or advancing through the professional ranks. Several researchers also stated that being required to publish in open access journals could compromise the credibility of their research and their reputation. A few respondents questioned how open access publications

and compliance with the policy would be considered by the Agencies and by peer review committees in future grant applications.

> *"Such policies are sometimes dismissed for ignoring or marginalizing scholars' academic freedoms: this policy expands academic freedom by ensuring a diverse and sustainable scholarly publishing ecosystem."* (University Library)
>
> *"When I go up for tenure and promotion, I am assessed according to the ranking of the journal. This policy would prevent me from 1. publishing, and 2. from publishing in journals that my colleagues would consider "leading" journals. It would completely compromise my standing and progress in my career.* (Researcher)
>
> *"(Name) supports the principle of open access and believes that it would lead to an overall improvement of costs, or at the very least, to a stabilization of these costs. We are, however, of the opinion that the Tri-Agency Policy must, to fairly redistribute system benefits, provide specifics and some university support mechanisms to ensure that researchers are not directly penalized (by the rise of direct costs of the right to access) to the detriment of other parties involved (gain in subscription fees, publishing costs, etc.)."* (University library)

Theme 3: Approaches to Open Access

Respondents commented on the approaches to open access in the policy, as well as policy elements such as embargo periods (i.e. the period of time before a publication must become open access), the unique needs of different disciplines, and the need to facilitate easy access to research findings.

The 'Options'

The draft policy specified two ways that grantees could comply with open access publishing requirements:

1. **Option 1**: Grant recipients submit their manuscript to a journal that offers immediate open access to published articles, or offers open access to published articles within 12 months. The Agencies consider the cost of publishing in open access journals to be an eligible expense under *Use of Grant Funds* in the *Tri-Agency Financial Administration Guide*.

2. **Option 2**: Grant recipients archive the final peer-reviewed full-text manuscript in a digital archive where it is freely accessible within 12 months (e.g. institutional repository or discipline-based repository). It is the responsibility of the grant recipient to determine which publishers allow authors to retain copyright and/or allow authors to archive journal publications in accordance with funding agency policies.

The consultation revealed varying levels of understanding and agreement about these options. Some respondents mistakenly thought that the consultation document was asking respondents to choose which of the two options should be included in the final policy. However, the intent of the policy is to allow for flexibility in compliance routes; grant recipients may choose between either of the options stated in the draft policy. Moreover, the two options are not mutually exclusive. The finalized policy will be developed to ensure the options for compliance are clear.

Several respondents suggested that researchers be required to deposit their paper into an institutional repository immediately upon acceptance, with the full text becoming publicly accessible after the embargo period, regardless of which open access option they choose.

Embargo Periods

Twelve months is too short:

Many publishers and scholarly associations stated that a 12-month embargo would be too short. They suggested that the embargo vary by discipline, with social science and humanities (SSH) journals afforded an extended embargo period of 24 or even 36 months (see section Recognizing the Unique Needs of SSH Disciplines). A major U.S.-based publisher commented that while most of its journals have a 12-month embargo, there are notable exceptions: one of its more popular top-tier journals is sustainable with only a six-month embargo, whereas others require 36 months embargo.

Several journals said that the policy would jeopardize their operations since one of their main client groups, institutional libraries, could opt to cancel their subscriptions knowing that articles would be freely available within 12 months. Both for-profit and not-for-profit publishers said a longer embargo would ensure that they could recover the cost of producing the final version of the manuscript including publishing, copyediting, marketing, and long-term website hosting. Many small, not-for-profit journals indicated that they would need financial support to remain viable.

"An embargo of 12 months would certainly mean substantial library cancellations for many of our journals, as many current subscribers would decide to wait a relatively short period for the material to be available in an institutional repository rather than subscribing." (Publisher)

"The purpose of scholarly research is to advance our knowledge and serve the public interest; any financial benefits to scholarly publishers is incidental and should be given an accordingly lower priority. The embargo period should be shortened to six months with a view of eventually eliminating the embargo period." (Researcher)

Twelve months is too long:

Conversely, many respondents, notably university libraries, suggested that a 12-month embargo period would be too long and highlighted the benefits of immediate open access to research. One scholarly association said that the embargo should be either shorter or "progressively removed" over time, while an open access publisher stated that the policy should reflect similar policies in the United Kingdom, the European Union and Argentina, which mandate a six-month embargo for science, technology, engineering and math (STEM) papers and 12 months for SSH papers.

Recognizing the Unique Needs of SSH Disciplines

While a large majority of SSH respondents said that they support the principle of open access, approximately one-fifth of those respondents said that the draft policy could better address issues unique to the SSH, notably the smaller research budgets (relative to NSERC and CIHR grants) and fewer open access journals. The comments pointed to disciplinary differences in publishing cultures and types of journals that could make it more difficult for SSH researchers to comply with the proposed open access policy.

Several researchers and publishers remarked that SSH papers are downloaded and read over a longer period than STEM articles, and that it takes longer for an SSH paper to receive citations and for an SSH publisher to break even or make a profit. As a result, many SSH researchers and publishers recommended a longer embargo period for papers in these fields (see Embargo Periods above).

One association commented that a policy governing SSH papers is unnecessary, since journal subscriptions in these fields are generally more affordable and, consequently, the journals already reach larger audiences than science journals.

> *"Research indicates differences between journals in the sciences and the social sciences in applicability of most Open Access models … while a one-year embargo period does not result in cancelled subscriptions for science journals, the social sciences require at least a two-year embargo, (and) ideally it would be five years."* (Journal Editor)
>
> *"This will place financial burden on small Canadian society journals particularly in the social science and humanities, many of whom depend on subscription fees to support the society."* (Dean of Research and Graduate Studies)

Facilitating Easy Access to Research Findings

A significant issue in the move to open access is identifying how to optimize repository systems to ensure that research papers held in institutional repositories and other digital archives are easily searchable and accessible to readers everywhere. An optimal system should also provide a seamless, user-friendly mechanism for researchers to deposit their articles.

Improving search functions

There was general agreement that current search capabilities are not ideal for finding research papers on the web (including personal web pages) or in institutional repositories. Some respondents said that the public may find Google Scholar user-friendly and effective in indexing content held in institutional repositories. However, one respondent pointed out that Google Scholar is less effective as a search tool for finding articles in French.

Several respondents stressed the need to invest in networks and infrastructure to link repositories for maximum search capability. Respondents also called for open access data management standards and suggested that full metadata be included with each paper stored in an institutional repository to make papers easier to find.

Where to post:

Feedback varied over the type of archiving infrastructure that would be the most accessible to researchers and the general public. Several respondents called for additional investments in the network of institutional repositories. Some respondents suggested the Agencies establish their own public repository or include links on Agency websites to all open access papers. Other respondents proposed a national archive similar to PubMed Central or the Ontario Council of University Libraries' Scholars Portal. Another called for the establishment of archives for research papers that are specific to particular disciplines, especially SSH disciplines. One U.S. publisher said that using the Clearinghouse for the Open Research of the United States (CHORUS), a public access database currently being tested, would provide easy and broad access to the most updated version of any manuscript. One researcher advised that any centralized archive should be located in Canada.

Ensuring long-term access to data

Several respondents suggested that the policy be broadened to apply CIHR's requirement for the long-term archiving of datasets to SSHRC and NSERC researchers. As one university library suggested, this could include a requirement that researchers use digital archives with a data management strategy that supports the re-use of data and its long-term preservation. One researcher said the Agencies should require researchers to include data management plans as part

of their grant applications to ensure compliance. Other respondents called on the Agencies to develop a plan and provide funding to support the preservation and long-term storage of data sets.

Theme 4: Implications for Journals and Associations

Most non-open access journals rely on institutional subscriptions as their main source of revenue to cover operating costs. One publisher estimated that moving to open access would cut up to one-third of its journal's revenue, including subscriptions, reprint royalties and aggregator fees. Another publisher estimated losing up to two-thirds of its revenue, forcing it to cease operations, since author publication fees and processing charges would not be high enough to cover publication costs, including editorial assistance and proofreading.

Some journals suggested that the policy would require them to adopt a new business model that sees individual authors, rather than journal subscribers (e.g. libraries and members of scholarly associations) bearing the lion's share of publication costs. One publisher said that, as a result of the policy, it may have to move its journals to lower cost jurisdictions outside of Canada.

Sustainability of Not-for-profit Scholarly Journals and Associations

Not-for-profit scholarly journals and associations were generally supportive of open access in principle, but were most concerned that their journals would lose a dependable and sustainable source of revenue – funds that are also used to support other scholarly activities. They stated that the open access policy, as worded now, would undermine scholarly publishing in Canada and threaten the sustainability of scholarly societies themselves, unless other avenues such as institutional or agency funding could replace subscription revenues. These respondents said that the policy could result in publications having to lower their high publishing standards, or even to cease operations or sell to a large international publisher. They also indicated that the policy could lead to fewer publishing options for Canadian researchers, particularly for research that is relevant to Canada.

More specifically, some universities and scholarly associations noted that researchers will lose vital knowledge mobilization channels if journals in small and/or specific subject areas cannot survive in an emerging open access business environment.

> *"There currently exists a hodgepodge of (institutional repositories) that are not necessarily entirely publicly available and that do not offer a single, easily accessed digital archive. A single repository is a more sensible solution (but funds for this are likely not available)."* (Scholarly Society)

> *"The major problem with option #2 [Repository Option] is that these repository manuscripts do not typically come up in the various search engines the public would use to find the material... Things to consider and debate: Have search engines access institutional repositories."* (Researcher)

Special Consideration for Francophone Journals

Concern was raised that the French research and scholarly communication ecosystem would be negatively impacted by the policy. Specifically, they suggested that the sustainability and survival of smaller journals would be threatened and that this would reduce the venues in which research in French could be published. Concerns were also raised about the ability to search French articles in repositories. Several respondents raised concern over the sustainability of *Érudit* – a repository that provides access to and preserves Francophone journals – as its revenue is based on subscription fees. One respondent noted that *Érudit* offers general access to most publications after two years.

Special Consideration for SSH Journals

As mentioned above (under Embargo Periods and Recognizing the Unique Needs of SSH Disciplines), several publishers and researchers stated that a longer embargo period would be needed for SSH journals, given that papers in these journals tend to be cited for a longer period of time than papers in STEM journals. Respondents commented that SSH articles are often significantly longer than STEM papers and more costly to produce, which results in fewer papers being published and fewer opportunities for revenue. They also mentioned that SSH journals tend to publish less frequently than many STEM journals.

Allowing a Transition Period

Some respondents recommended that the policy allow a transition period before the policy comes into effect, which would give publishers time to develop new funding sources and develop hybrid or "Gold" open access options.

> *"Your open access policy will most likely undermine funding for our journal, or may even make its on-line distribution impossible, if no compensation is planned to support the invaluable role that Érudit plays for us. From our perspective, option 2 of the draft policy—to give the authors the responsibility of making their publications public within 12 months following the release of an article—is the least damaging for the continuity of our journal."* (Journal)

> *"With a reduced revenue base, journals may be forced to lower publication standards by eliminating multiple peer reviews, plagiarism checking, copyediting, marketing, or online platform features."* (Publisher)

> *"The scale of the Canadian market needs to be taken into consideration, since even a small drop in subscription revenues may have an immediate negative impact on small journals and adversely affect the quality of the scholarship."* (Publishers' Association)

Theme 5: Financial Implications for Researchers

The majority of researchers commented on the impact that the policy would have on their grant funds. Universities, university research offices, and scholarly associations also raised this point. They noted that depending on the cost of article processing charges (APCs) and the volume of publications, researchers may have to use a large amount of their grant funds to publish in the top journals.

Respondents highlighted cost as a particular issue when it comes to 'hybrid open access' journals (subscription-based journals that also provide researchers the option of paying a fee to make their paper immediately available online for free). The hybrid model raised concerns about double-dipping as these journals continue to charge subscriptions for access to the majority of content even as they receive new revenue from researchers who choose to pay charges to make their articles open access.

> *"Although the OA proposed policy is well-meaning, it will escalate publication costs for individual researchers, cause an outflow of federal research money from Canada (open access journal fees), limit the number of journals where NSERC-funded researchers are able to publish their work, and thereby decrease the impact of NSERC-funded research."* (Researcher)
>
> *"What is required is a careful study of the cost implications bearing in mind the experience of other countries such as the U.K. This could result in a series of alternate cost models including the identification of a fixed percentage of research funds which could be spent on open source publications."* (Researcher)
>
> *"This policy addresses no real problem in the Canadian scientific community. The policy's main effect would be of diverting our research funds to the benefit of large publishing houses, without any benefits for researchers."* (Researcher)

Although the draft open access policy considers APCs allowable under *[Use of Grant Funds in the Tri-Agency Financial Administration Guide](#)*, several researchers indicated that, without additional funds to cover these fees, they would have less money available for student training and research, which would in turn result in fewer publications. Some respondents said it would be a misuse of public funds to divert scarce research funding to commercial publishers. One small Canadian journal said researchers at larger or wealthier institutions would have an advantage as their institutions may provide funding to defray such costs.

Questions were also raised as to who would pay open access publishing fees when a project involves multiple collaborators and different funding agencies.

Several respondents stated that the policy would result in researchers trying to minimize costs by publishing in open access journals with lower fees, limited impact, questionable quality and low readership. While this would technically meet the policy's requirements, researchers warned of unintended consequences, such as making it more difficult to publish in top-rated journals, reducing their competitiveness in winning future grants, limiting career advancement, especially for young scholars (see also Theme 2), and reducing the productivity and impact from Canadian-funded research.

Next Steps

The Agencies recognize the importance of the issues raised in the consultation and welcome the breadth of views on how Canada can effectively transition to an open access environment for scholarly works. Our goal is to announce a harmonized open access policy for peer-reviewed journal publications in fall 2014.

We will continue, individually and as a group, to engage in discussions with key stakeholders including scholarly societies, publishers, institutions, libraries, and other research funders, to explore cooperative approaches for continuing to move towards open access to research publications.

We would like to take this opportunity once again to thank all those that provided their feedback during the consultation process. If you have any questions or comments about this report, please contact openaccess@nserc-crsng.gc.ca.

Appendix A

We received 201 submissions from various individuals and organizations on the Draft Tri-Agency Open Access Policy consultation. Below is a breakdown of respondents:

Group	Number of Responses
Individual researchers	
Natural Sciences & Engineering	70
Social Sciences & Humanities	32
Health	4
Faculties/Departments	11
University Libraries (including individual librarians)	15 (incl. 3 librarians)
University Research Offices	6
Universities	20
Scholarly Associations	13
Other Associations	12
Publishers	7
Journals	11

Note: Categories are not distinct and mutually exclusive. For example, many scholarly associations publish a journal (not-for-profit) and several researchers are also journal editors.

There were 78 submissions from individuals and organizations working in, or representing, natural sciences and engineering (NSE) fields:

NSE Group	Number of Responses
Researchers	70
Faculties/Departments	2
Scholarly Associations	3
Publishers	2
Journals	1[2]

There were 60 submissions that came from individuals and organizations working in or representing social sciences and humanities (SSH) fields:

SSH Group	Number of Responses
Researchers	32
Faculties/Departments	6
University Research Offices	2
Scholarly Associations	10
Journals	10[3]

---

[2] Two NSE scholarly associations and one NSE researcher, in addition to presenting their own concerns, also speak on behalf of journals.
[3] Three SSH scholarly associations, in addition to presenting their own concerns, also speak on behalf of journals.