



INTERNATIONAL ASSOCIATION OF SCIENTIFIC, TECHNICAL & MEDICAL PUBLISHERS

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Mr Zilgalvis and Ms Ramjoué
European Commission: Research Directorate-General
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Dear Mr Zilgalvis/ Ms Ramjoué

Synthesis of Public Consultation on "Study of Scientific Publication Markets in Europe"

STM noted with interest the results of the public consultation on the "Study on the economic and technical evolution of the scientific publication markets in Europe", held between 31 March and 15 June 2006, in terms of the contributions of the 170 individuals and organisations that responded, the synthesis of these comments made by your consultant Fred Friend (a well-known open access advocate) and its subsequent use in an article on *CORDIS*.

Fred Friend's review comment that "publishers were generally critical" of the ULB study is a considerable understatement. A fairer summary of their positions on the study could be summed up as "the wrong data, wrongly analysed, giving the wrong conclusions" or "yesterday's answers to yesterday's problems". It is to be hoped that when final policy decisions are made proper weight will be given to the **substantial, fact-based** evidence supplied by ALPSP, the PA, the Biochemical Society, Elsevier, STM and its retained economics advisers MICRA, and others. It is noteworthy that many of the individual response contributions (60 out of a total of 170 responses) were only a couple of paragraphs in length expressing support for a particular advocacy position rather than any detailed, fact-based analysis. It is only by the questionable process of giving all comments equal weight (irrespective of their evidential quality) that the headline in the *CORDIS* article about the consultation ("Public supports overhaul of European scientific publication system") could remotely be justified.

On pages 3 and 9 of the review it is stated that "the importance of long-term preservation features strongly in the responses and is linked to the issue of access to content". Preservation and access issues are entirely separate and should not be conflated, a fact that has already been acknowledged by the report of the subcommittee on copyright of the High Level Expert Group on Libraries of DG Information Society and its i2010 Digital Library Initiative.

Evidence-based decision making is a central plank of the Better Regulation endeavour espoused by the Commission: STM hopes that due regard will given to information presented as to the current-day situation, as opposed to historic, often inaccurate, views on access, prices and availability.

Yours faithfully

Michael A Mabe
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