

The Hague, 21st May 2013

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STM submission on “Draft ICAR Open Access policy”

The International Association of Scientific, Technical and Medical Publishers (“STM”) is the leading global trade association for academic and professional publishers. It has over 127 members in 21 countries who each year collectively publish nearly 66% of all journal articles worldwide and tens of thousands of monographs and reference works. STM members include learned societies, university presses, private companies, new starts and established players.

STM publishers disseminate journal content, books and reference works, and databases, in a variety of forms including print and online, and in addition provide systems that enable access to individual articles and contributions (hereinafter: “Content”) of a multitude of international scientific, medical and technical authors and scholars. This Content is available widely in electronic and in print form for access by individuals, whether through academic and corporate libraries or directly, for use in research, education, in industry, the professions and business.

STM welcomes this opportunity to make its submission to the draft ICAR Open Access Policy.

STM wishes to contribute constructively to the debate by giving its general comments and specific replies to the outlined draft ICAR Open Access Policy.

STM’s submission consists of two parts:

A. STM’s general comments

B. STM’s specific comments to the ICAR draft

A. STM’s general comments

STM publishers support the maximum sustainable dissemination of the published record of science and for 350 years we have helped create, disseminate and (now) preserve the world’s body of knowledge. We do not oppose any funding body desire to make articles whose underlying research it funded in some manner freely available but counsel that this must be done in a sustainable manner.

STM has carefully read the draft ICAR Open Access Policy and believes that the Indian Council of Agricultural Research would benefit from an appreciation of the following key attributes of scholarly communication:

1. Funders may underwrite the cost of research but publishers underwrite the cost of certifying articles about that research as well as their dissemination and discovery

STM publishers recognize and applaud the efforts of private sector organizations and government institutions to supply funds to support scholarly research activity. These funding activities are an essential component of today's well-functioning and interdependent system of scholarly scientific communication that relies on each of its major stakeholders (e.g. authors, researchers, primary and secondary publishers, libraries, universities, federal government) to perform a key role in the development and dissemination of peer-reviewed papers. The essential role that publishers play in this system is to underwrite the creation, registration, certification, formalization, improvement, dissemination, preservation and use of scientific information.

Today over 2,000 scientific and scholarly publishers worldwide (including large and small commercial, university presses and learned societies) manage and fund the processing of some 2-3 million manuscripts submitted from researchers and finally produce annually in excess of 1.7 million peer-reviewed published journal articles in some 25,000 journals.

Since the early 1990s, STM publishers have invested heavily in the migration from print based products into electronic, digital versions, with the result that 96% of scientific, technical and medical journals¹ and 87% journals in arts, humanities and social sciences are available electronically, fully searchable, and accessible on the world wide web.

At the same time a variety of new business and access models are evolving (and continue to do so), which share the following points in common: they are (i) based on principles of sustainability, (ii) voluntarily collaborative, and (iii) market driven. Each of the evolving models has its own characteristics, serves a specific need and audience, and offers user flexibility (for particular target audiences or communities including e.g. visually impaired users). Examples range from pay per view/download; article rentals (e.g. as provided by DeepDyve); funder-, institutional- or author-paid access, site and user-based licensing; and delayed access. The STM industry is experimenting in the field of business models (such as Open Access), and was engaged in evaluative projects such as PEER² to generate evidence-based data for future policy-making.

All those ongoing initiatives and developments have helped to improve researchers' productivity, resulting in falling costs per journal and article for libraries (e.g. UK)³ and improved access to specialists and society, including those in the less developed world (e.g. via the Research4Life programme)⁴. Today, because of voluntary publisher investments, *more people have more access to more scientific information than at any time in human history.*

2. The value that publishers add to articles describing research findings, and their dissemination and discovery, requires significant investment and that investment must be recovered

STM publishers are true partners with researchers in scholarly communication — publishers identify new areas of science (or changes in disciplines) which are under-served; launch new journals or adapt existing ones to meet these needs; and add value to those journals through innovative web-centered tools and services. On a daily basis, their publishing staff is engaged in:

¹ Cox, J. and Cox. L. (2008) Scholarly Publishing Practice: Academic Journals Publisher's Policies and Practices in Online Publishing: Third Survey (ALPSP)

² <http://www.peerproject.eu>

³ RIN (2009) E Journals: their use, value and impact, <http://www.rin.ac.uk/our-work/communicating-and-disseminating-research/e-journals-their-use-value-and-impact>

⁴ Research4Life: http://www.research4life.org/Pages/R4L_homepage.aspx

- **substantive editing and interaction** with the research community;
- **improving quality** through organizing, managing, and financially and technologically supporting peer review;
- **easing researcher workloads and enhancing productivity** through web-based author, editor, and reviewer services such as e-submission and e-refereeing, as well as rapid and efficient author-friendly production workflows;
- **enhancing readability** through substantive copy/technical editing and the preparation of illustrations or special graphics;
- **broadening accessibility** through commissioning material that emphasizes the scope and significance of research results to broad non-specialist audiences;
- **branding excellence** through underwriting and managing the creation, maintenance, and evolution of peer-reviewed journals;
- **fostering dialogue** through the creation of global forums that both reflect, and help shape, the development of emerging scientific fields and foster the interchange of ideas and the cross-fertilization of knowledge to the benefit of human health and welfare;
- **globalizing knowledge** by contributing to the development of international standards and protocols⁵ that improve the accessibility of research and ensure the seamless flow of information;
- **improving skills through** forums and training for researchers to improve their knowledge of, and skills in, the use of online research tools and techniques.

STM publishers are at the forefront of innovation and constantly engaged in supporting, adapting, maintaining and developing cutting-edge technological solutions that enhance the ways in which the research community and society at large produces, accesses, uses and shares scientific knowledge, and how the research community works collaboratively to identify and solve the key challenges facing our world. STM publishers:

- **drive innovation** by experimenting with new content, functionality, and design, and by developing and investing in new tools to aid discovery and dissemination, such as text and data mining and visualization tools, semantic web applications, user-friendly navigation aids, flexible displays, and Web 2.0 applications such as blogging around articles, shared bookmarking, and other forms of online collaboration
- **enable discovery** through podcasts, RSS feeds, customized citation and table-of-contents alerting services, web platforms with sophisticated functionality and design geared to aid and enhance discovery through user-friendly navigation, graphics, taxonomy, personalization, search, browse, analysis, retrieval, and linking tools that provide scientists with seamless and instant access to essential research in a globally standardized format, that facilitate understanding of the relevance of new research tools and technologies, and that make content more accessible to general and specialist search engines
- **enrich content** by inserting tags to create online links to related information, coding for web dissemination and layout, visual enhancement, reference linking, and indexing

Such investments of time, high-level skills and infrastructure require significant financial investment by STM publishers and these costs must be recovered. Because STM peer-reviewed journals, which represent the main dissemination vehicle in the process of scholarly communication, are generally independent of the sources of research funding, any open access policy adopted by a funding body should foster publishers' ability to continue providing these essential services.

⁵ Crossref: <http://www.crossref.org> ; ORCID (Open Researcher Contribution Identification Initiative) <http://science.thomsonreuters.com/orcid/>

3. Publishers are open to dialogue about how open access to articles describing research findings may be enhanced, but oppose unfunded and unsustainable policies

Funding agencies/governments contribute significant funds for research, and researchers and their institutions provide the facilities and knowledge to support and perform research and informal communication about that research. STM supports the view that the public should have access to the research results that public grants have funded. Research results are the basis of many articles in scientific publishing, but the articles themselves are different works that include publishers' added-value, which is *not* funded by public money.

Green Open Access, or author self-archiving in institutional repositories, lacks a sustainable financial business model, and the assumption that costs for this model are "*paid through institutional journal subscription fees*" is misleading since the presence of free copies of articles in repositories may jeopardize the continued subscription to journals containing those articles. As yet, there are no evidence-based data about the possible impact of Green Open Access on the viability of journal subscriptions.

Gold Open Access may also be described as the "pay-to-publish" business model, where the payment may be made by the author, his/her institution, the funding agency of the research grant, etc.. Some publishers offer this model for all of their journals, others offer it for a subset of their journals, and others offer the so-called "hybrid" model, where open access rights can be paid for individual articles published in journals that are also supported by subscription income.

Policies by governments, funders or institutions for authors to deposit article versions that have benefited from publisher services should provide funding support for authors to reimburse publishers for services they have provided.

If the ICAR elects to consider such a course of action, then ICAR should determine in negotiations with publishers in what fashion such access could be provided and the relevant fees that might be necessary to compensate publishers for the use of their copyrighted works and the significant value publishers add to peer-reviewed articles.

In addition to these key points, STM requests that the ICAR also consider the following in its deliberations:

- Scholarly communication today is a well developed, established and balanced "ecosystem" where each stakeholder performs a certain task. Publishers raise money to fund the infrastructure that enables the discovery, registration, certification, finalization, dissemination, and (most recently) preservation of research articles through peer-reviewed journals and the web platforms that host them. Both journals and the web platforms that publishers underwrite are an integral part of the scholarly communication system.
- Scientific research forms the basis of many articles in scientific publishing, but the articles themselves are different works that include publishers' added-value that is *not* funded by public money. STM peer-reviewed journals, which represent the main dissemination vehicle of scholarly communication, are generally independent of the sources of research funding that support research. The value that STM publishers add to both journals and articles requires significant investments that must be recovered. Any policies and/or mandates by funding agencies to deposit article versions that have benefited from publisher services should provide funding support for authors to reimburse publishers for services they have provided.
- Green Open Access, or author self-archiving in institutional repositories, lacks a sustainable financial business model and the assumption that this activity will have no adverse impact on scholarly communication is unsupported. In collaboration with other stakeholders in scholarly communication,

STM was engaged in a large-scale project (PEER) to develop credible evidence on this important issue. The final results of this project can be found here: <https://www.peerproject.eu>

- STM publishers welcome discussions about the use of Gold Open Access but note that ICAR would like to require that articles be deposited in open access repositories, they should take into account the cost of publishing and make payment out of grants possible. Other funding bodies, such as the Wellcome Trust, explicitly do so.
- If speed, worldwide accessibility and transparency are the funder's primary goal, then it should immediately make public the research reports that it receives as a condition of grant-making and fund the creation of material that makes these reports accessible to the general public.

B. STM's specific comments to the ICAR draft

- The current draft policy document does not foresee any possibility for researchers to use ICAR funds to pay for Author publication charges (APC's) in order to publish the research article under the Gold Open Access model. STM would therefore urge ICAR to consider to set funds aside to offer researchers this publication avenue. By offering this opportunity, ICAR would follow the recently announced policy of the Research Councils in the United Kingdom where Gold Open Access is the preferred model.
- If ICAR requires immediate deposit of the final authors version manuscripts (preprints) in the ICAR OA repositories, then those preprints should be made available to the public (Internet) ONLY AFTER evidence-backed and sustainable embargo periods (12 or 24 months or more according to the discipline).
- In case that funds are available to pay the APC's, publication will be immediate. Where those funds do not exist, appropriate and evidence embargo times must apply (12 / 24 months).
- Different disciplines have (and indeed different researchers within disciplines) have differing views about the suitability of the different varieties of Creative Commons licenses. In STM's view no restrictions to researchers should be imposed in the ICAR draft policy.

Respectfully submitted

For and on behalf of the International STM Association

May 21st, 2013

Very truly yours,



Michael Mabe
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