

STM Association recommendations on the next EU Framework programme (FP9) on Open Access and Open Science

STM Publishers have long been committed to ensuring the widest possible dissemination of scholarly literature whilst safeguarding the quality, integrity, and preservation of the scholarly record. This commitment to scholarly communication is central to our mission. Publishers invest, innovate and evolve their services to meet researchers' needs in support of open science, including through the development and provision of new delivery methods and access options for scholarly literature.

The International Association of Scientific, Technical and Medical Publishers (STM) supports the European Commission's Open Science agenda and is currently serving as publisher representative on the Open Science Policy Platform. Publishers support open science through the provision of open access, open data, research metrics and additional initiatives which enhance collaboration, inclusiveness and transparency for researchers and others in the research ecosystem.¹ For example, publishers support FAIR principles for data and are engaged in discussions regarding the European Union Open Science Cloud. Publishers joined in the development of citation principles for data to assist researchers' needs, and a number of publishers endorsed the Joint Declaration of Data Citation Principles² to ensure researchers get appropriate credit for their work. STM has been involved in numerous projects³ exploring data citation and preservation, including RDA and APARSEN⁴.

Given publishers special position at the interface between researchers, their research and the global public, we are well placed to contribute to discussions around open science and to help translate aspirations into reality. Publisher efforts need to be complemented by support for education, awareness and skills training, as has already been recognised by the Commission.

STM makes the following recommendations to the Commission as it considers the next EU Framework Program, FP9.

STM recommendations on the next EU Framework programme:

STM welcomes the efforts of the European Commission to support open access and recognises the Commission's commitment to being a leader in this regard, specifically through its commitment to 100% OA by 2020. STM remains ready to work with the Commission to ensure open access can progress in ways that respect researcher choice and respect the diverse approaches to open access taken across different parts of the world, both outside and within Europe.

To ensure continued progress towards full open access, STM recommends the following:

¹ http://www.stm-assoc.org/2016_10_31_STM_Open_Science_Position.pdf

² <https://doi.org/10.25490/a97f-egyk>

³ <http://www.stm-assoc.org/standards-technology/integration-of-data-and-publications/>

⁴ <http://www.stm-assoc.org/standards-technology/integration-of-data-and-publications/>

- **Ensure adequate funding for gold OA and its administration in a researcher friendly way**

The Commission currently enables researchers to cover the cost of APCs from their research grants before a project ends and has additionally set up a temporary mechanism to enable post-grant funding for publications resulting from the Framework programme 7 (FP7), administered by OpenAire. Having a post-grant mechanism is vital, as many articles are published after a project ends. To make the policies work, the Commission should ensure:

- A mechanism remains in place to administer post-grant funding for gold OA;
- Active and clear communication informs researchers on how to obtain adequate funds for Gold OA during, and after their projects; and
- The administration of the EU Commission's policy aligns with what the policy allows, specifically on funding for the full spectrum of gold OA journals (see below).

- **Continue to support hybrid journals.**

It is important that researchers have the freedom to publish in the publication outlet of their choice. Many gravitate towards established journals in their field that have evolved to offer both subscription and open access options (hybrid). Studies have shown that much of the growth in gold OA publishing in the UK has been driven by publication in hybrid journals, which are seen as a marker of quality in the research community⁵. The Commission has appropriately taken a flexible approach to the funding of gold OA, that allows authors to take advantage of open access options across all journals. However, the way in which funding is currently administered for publications originating from FP7⁶, limits researcher choice and does not enable the highest uptake of gold OA publishing possible. STM recommends that funds for Gold OA are administered without any discrimination with respect to hybrid journals.

- **Avoid capping Article Publication Charges (APCs)**

APC caps would restrict authors' choice of publication avenues for gold OA, and thus hinder the overall growth in gold OA. APC prices continue to correlate with quality and authors should have options as the market for APCs continues to mature. While some studies⁷ indicate that the median APC is about 2000 Euro, STM fully believes that this does not reflect the current market⁸ and therefore it is too low for a 100% Gold universe. Flexibility is needed to enable researchers to take advantage of the full range of open access options available to them. We recognise that current Horizon 2020 policy does not seek to cap APCs, but remain concerned that APCs may be capped in practice by the way in which post-grant funding for gold OA is currently administered. Such unintended impacts should be remedied in FP9.

⁵ <http://www.universitiesuk.ac.uk/policy-and-analysis/reports/Documents/2015/monitoring-the-transition-to-open-access.pdf>

⁶ „The most controversial clause in the Pilot conditions is without a doubt the ‘no hybrids’ clause...“ see [OpenAire report](#)

⁷ http://pubman.mpg.de/pubman/item/escidoc:2148961:7/component/escidoc:2149096/MPDL_OA-Transition_White_Paper.pdf

⁸ http://www.stm-assoc.org/2015_12_04_STM_Response_to_MPDL_Open_Access_Transition_White_Paper.pdf

- **Allow flexible embargo periods**

Flexible embargo periods for self-archiving / green open access strike a balance between enabling authors to make versions of articles freely available as early as possible, while also ensuring that the journals publishing these articles can continue to operate. Embargos of 6 or 12 months do not strike an appropriate balance for all journals; while they are supported by some journals, these are far from the majority. A more flexible embargo period would broaden the range of options authors have for facilitating g OA and complying with anticipated FP9 OA requirements, while still enabling authors to opt for immediate access via the gold route. These issues are discussed in more detail in the STM Statement on Green Open OA⁹. We recommend the approach taken by the European Research Council after a project ends, which allows beneficiaries to use an extended embargo time for the self-archiving / green open access route if they cannot provide access within the set time limits or publish gold OA.

- **Address unique issues regarding long text formats**

Discussions with all stakeholders about the best methods for dealing with long text formats (such as books and monographs) to be enabled open access should continue. Open access for books is still nascent and diverse. Social Science, Arts and Humanities, in particular, - where longer formats are the default for research outputs, often lack financial resources. To make Open Access a requirement for long-text formats, sufficient funding for publication fees needs to be made available through the FP9 program and licensing requirements need to be defined flexible enough to meet the special requirements of these disciplines.

- **Integrate with existing infrastructure and platforms**

Existing infrastructures and platforms should be utilised as much as possible, and new initiatives should complement existing ones where possible. STM welcomes the open approach being taken by the Commission via the European Open Science Cloud, which works in partnership with all stakeholders to avoid duplication of efforts. The same principles should be applied to all areas of open science.

- **Enable competition and diversity**

No measures should be included that harm the diversity and competitiveness of the publishing market which includes new and established players, as well as scholarly societies, university presses, foundation supported not-for-profits, and commercial organisations.

Support balanced rules for text and data mining

- Support for balanced copyright rules for Text and Data Mining (TDM) will offer legal certainty for researchers by enshrining in EU law that which is already permitted in some Member States, and which is already offered by scientific publishers through licensing agreements¹⁰. The proposed new exception by the European Commission (COM (2016) 593) provides the commitment that any researcher who is part of a public research organisation, and therefore

⁹ http://www.stm-assoc.org/2017_05_01_STM_Position_Green_OA.pdf

¹⁰ http://www.stm-assoc.org/2017_05_10_Text_and_Data_Mining_Declaration.pdf

has lawfully acquired access, can reproduce works for the purpose of text and data mining at no additional cost or negotiation.

- **Use voluntary initiatives to Implement open science**

Open science should be implemented using a bottom-up approach that emphasises education and incentives rather than mandates and penalties.

- **Provide sufficient support to enable FAIR Data access**

Financial costs involved in making data FAIR (Findable, Accessible, Interoperable, and Re-Usable) should be supported by making them eligible cost in FP9.