



Society of College,
National and University
Libraries

Study on the economic and technical evolution of the scientific publication markets in Europe. Final report – January 2006

CURL (The Consortium of Research Libraries in the British Isles) and SCONUL (Society of College, National & University Libraries) are grateful for the opportunity to comment on and respond to this timely study, commissioned by the European Commission's Directorate-General for Research.

CURL and SCONUL welcome the publication of this important and thoroughly-researched report, which is evidence of the European Commission's recognition of the importance of scientific publication and dissemination for the economic and social development of the European Union member states, together with the Commission's awareness that the current state of the publications market certainly deserves investigation, and may require some far-reaching adjustments.

The report is especially strong in the economic analysis of its empirical findings. It is encouraging and illuminating to read the views of independent experts from the Université libre de Bruxelles. These views in general strongly support the position of CURL and SCONUL (arrived at as a result of pragmatic observation, rather than theoretical analysis), and that of other bodies such as the UK House of Commons Select Committee on Science and Technology, that there are many damaging imperfections in the present scientific publication system. As a corollary, the report stresses that intervention at a governmental level is necessary to balance the 'market power' of the large publishers resulting from the monopolistic tendencies of the current market.

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This response will concentrate on the report's recommendations, given in the Executive Summary and repeated in Section 10. The recommendations are divided into three broad areas, the first five (A1-5) relating to access issues, the next three (B1-3) covering the important market questions of barriers to entry and competition, followed by two more general proposals (C1-2) for further action.

In general, CURL and SCONUL support the thrust of all the recommendations, and we comment further in the following paragraphs.

A1: Guarantee public access to publicly-funded research results shortly after publication

- This is a key recommendation promoting open access to research findings, generating more effective research in the future, and ensuring more rapid scientific progress and economic development within the EU. We strongly support the suggestion that EC funding should be accompanied by a mandate requiring availability of resulting articles in open access archives, together with more exploration of how such policies can practically be implemented. The Commission may wish to refer to examples which already exist, including mandating organisations such as the Wellcome Trust and CERN, together with many institutional repositories plus some subject repositories such as for example the in-development UK PubMed Central.
- We believe that there is no requirement for an embargo period as discussed in the recommendation. To obtain maximum advantage of research (publicly-funded, as stressed by the report), it should be available to all on publication. There is as yet no empirical evidence that publisher sales and profitability are affected by immediate access, as indicated by the experience of physics publishers co-existing in harmony with the ArXiv repository.

A2: Aim at a 'level playing field' in terms of business models in publishing

- We welcome the recognition that a 'level playing field' does not at present exist, that the current market is heavily weighted towards the large commercial publishers, and that positive measures are required to change this situation.

- The report authors believe it is most important to allow experimentation with different models, given the drawbacks of the current system. They recommend that funders pay publication charges where these support open access journals, while libraries continue to receive budgets to buy subscription journals. They recognise that a 'key policy debate' is required to plan future support, but believe this is only feasible when more evidence is available. We strongly support this recommendation.

A3: 'Extended quality' rankings of scientific journals

- The report recognises that citation analysis will remain an important measure of scientific quality, but also wishes to measure 'quality of dissemination' by tracking such journal/publisher elements as self-archiving authorisation, archiving provisions, copyright provisions, etc. CURL and SCONUL acknowledge the vital need to maintain and reward scientific quality, but note that there is a growing body of research on alternative citation and impact measures, at the article level, and including open access publishing, and support efforts to develop new and more comprehensive measures of scientific quality.
- We support further work on 'quality of dissemination' measures, recognising the importance of these factors, although there are reservations on how practical it will be to come up with comparable metrics, that will achieve wide recognition and will affect author behaviour.

A4: Guarantee perennial access to scholarly journal digital archives

- This is a most important aspect of scientific publication. We support the specific recommendations on remote access to legal deposit library collections, on investigation of the feasibility of a 'European JSTOR', and on appropriate standards for and portal access to digital archives. In addition to any new initiatives, there should also be evaluation of existing initiatives such as LOCKSS/CLOCKSS and Portico.

A5: Foster interoperable tools to improve knowledge visibility, accessibility and dissemination

- We support the general recommendations relating to the adoption of XML and the wider implementation of the OpenURL standard and the OAI-PMH protocol. There are few specific recommendations on how this should be taken forward, although there is discussion of the EC's own forthcoming i2010 Digital Libraries funding programme (http://europa.eu.int/information_society/activities/digital_libraries/index_en.htm): we support the need to ensure that this study feeds into the development of that programme.

B1: Promote pro-competitive pricing strategies

- Alongside A1 and A2, this is one of the report's key recommendations. The authors are very concerned about the anti-competitive aspects of 'big deals', acting as effective barriers to entry for newcomers. Representing libraries, we recognise that big deals have enabled access to many more journals for many library users in recent years, but we are also very aware of the accompanying difficulties, including the cancellations and non-ordering of titles from smaller publishers (as cancellations from the big deal publishers are severely limited).
- We support the recommendations relating to the use of transparent indicators for pricing (as opposed to 'historical print subscriptions'), and are in favour of greater flexibility for bundles rather than the all-or-nothing approach prevalent today. We are wary of usage forming the basis of pricing, with its inbuilt incentive to restrict access in some way (the report notes that prices should not increase with rising usage across the board, but this might be difficult to enforce in practice). Some proxy of size or type of institution (FTE numbers etc) is much more acceptable, although again care would have to be taken against automatic inflation. The report suggests that 'rules ... could be promoted by the European authorities' although this is not spelt out in detail, and might be problematic in some respects.

B2: Scrutinize future significant mergers

- The report reviews, and agrees with, the evidence that mergers in the publishing industry increase market power and increase prices. In Section 3 there is extensive evidence that commercial publishers charge more (around three times more, comparing like with like) than not-for-profit publishers, and that pricing is based on value rather than costs, a sure indication of the existence of market power (as opposed to a competitive market) according to the authors. We strongly support the recommendation that 'further acquisitions by large publishers should be scrutinized by the relevant European authorities'.

B3: Promote the development of electronic publications

- There is a clear recognition in the report of the distorting effects of the current VAT regime in almost all EU states. We strongly support the recommendation that a remedy is required. Given that a reduced VAT rate for all information resources would entail unanimous action by all governments, a 'tax refund mechanism for research institutions', which can be implemented by individual member states, is probably the preferred practical solution to a long-standing problem.
- There is a recommendation on public funding specifically for social science and humanities journals, to assist them in the transition to electronic availability. For current volumes this may be a greater difficulty in some countries other than the UK, but there is a widespread backfile conversion problem in this area, which the existence of a 'European JSTOR' (A4 above) would go some way to alleviate.

C1: Setting up an advisory committee

- An advisory committee including all stakeholders might be a useful development, although it would have to ensure that it did not cut across the activities of existing bodies, that there was sufficient common ground to allow progress to be made, and that it had a specific remit that would encourage action and not just discussion.

C2: Further investigation

- Further investigation is always required, although targeting is very important. The three topics mentioned – copyright provision, economic analysis of alternative forms of dissemination, and technological developments – are all covered in various other fora, although there is merit in an analysis from an EC policy point of view, provided that investigations and reports lead to action.

CURL and SCOUNL support the recommendations of this study, as outlined above. We look for action to be taken as a result of this study, and recommend that the Directorate-General for Research accepts and takes forward the report. We recognise that this will require the involvement of other DGs, particularly the DG Competition, and look forward to vigorous discussion within the EC as a whole, leading to the speedy implementation of policy changes, in order to optimise the production, dissemination and impact of scientific research within Europe. We also recognise that much progress will be dependent on the actions of member state governments, and encourage the Commission to seek to influence governments to implement policies that promote change.

Yours sincerely



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CURL, Consortium of Research Libraries

Established in 1983 to bring together the larger research-based university libraries in the United Kingdom and Ireland, CURL has grown from a fairly informal grouping of seven university libraries into a strong, nationally and internationally recognised partnership of 25 major research libraries participating as full members, including 22 major university libraries and the UK'S three national libraries. It also has one associate member, the Wellcome Trust. CURL's mission is to increase the ability of research libraries to share resources for the benefit of the local, national and international research community. More information is available at www.curl.ac.uk

SCOUNL, Society of College, National and University Libraries

SCOUNL, founded in 1950, is an association representing the heads of library and information services in all universities in the UK and Ireland (and in most other institutions of higher education in the UK), together with the directors of the national libraries of the UK and Ireland. By sharing good practice, and facilitating collaborative schemes for the benefit of library users, SCOUNL (www.sconul.ac.uk) promotes excellence in its constituent library services.