

## HOUSE OF COMMONS BUSINESS, INNOVATION AND SKILLS COMMITTEE: INQUIRY INTO OPEN ACCESS POLICY

### Submission by RLUK

1. Research Libraries UK (RLUK) represents 33 major research libraries across the UK, including those in the Russell Group of universities. We believe that the UK should have the best research library support in the world.
2. Under the current model of scholarly communications UK HE libraries spend over £150 million annually purchasing subscriptions to a selection of academic journals, with some of our larger universities spending over £1 million per year on the journals of a single publisher.
3. No library can purchase all of the journals, and by extension all the articles, that researchers need to be fully effective. Not even the most well-funded libraries in the world are able to fulfil all the information needs of all their researchers. In 2012 Harvard library, possibly the world's best-funded university library, announced that it could no longer afford to sustain current levels of journal purchasing.<sup>1</sup>
4. This results in gaps in the knowledge base. Most worrying, a UK researcher being funded by one of the UK Research Councils may not have direct access to all of the research published by other UK researchers working in the same field and funded by the same Council.
5. Therefore, RLUK wholeheartedly welcomed the statement made by the Minister of State for Universities and Science, the Rt Hon David Willetts MP, that the 'Coalition is committed to the principle of public access to publicly-funded research results'<sup>2</sup>.

### THE FINCH GROUP

6. RLUK was one of the stakeholder groups represented on the Finch Group, through Phil Sykes the Librarian at Liverpool University and past Chair of RLUK. Therefore RLUK broadly welcomes the support for open access with the Report *Accessibility, sustainability, excellence: how to expand access to research publications*.
7. The Finch Group concluded that a move towards open access for UK-funded research was desirable and proposed mechanisms for an orderly and phased transition from the current model to a mixed, open access model. However, there were two areas within the description of the transition which RLUK believes could have benefitted from more careful consideration.

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<sup>1</sup> <http://isites.harvard.edu/icb/icb.do?keyword=k77982&tabgroupid=icb.tabgroup143448>

<sup>2</sup> <https://www.gov.uk/government/speeches/public-access-to-publicly-funded-research>

8. The Finch Group was explicit in that it did not commission research into the current state of scholarly communications, but relied on existing evidence to reach its conclusions. Therefore, it may have underestimated the success of existing UK policies on open access.
9. For example, following extensive consultation with all stakeholders, the Research Councils announced an initial open access policy in 2005 whereby their grantees were requested to deposit copies of their papers in suitable repositories, where allowed to by the copyright constraints of the journals they published in.
10. The initial RCUK policy was relatively 'soft', with no sanctions for those who did not follow it and options to opt-out if copyright conditions in specific journals did not allow for deposit.
11. However, despite the 'softness' of these policies we now see approximately 40% of UK articles freely available. This is double the global average of 20%. Relying on the figure for the global average led the Finch Group to conclude that the 'green' route to open access was not successful and created a focus on the gold route.
12. Evidence from institutions worldwide where deposit mandates have been strengthened show that compliance rates can very quickly (within a couple of years) exceed 70% of total research output.
13. Therefore, we believe that rather than sidelining the green route, a more efficient strategy would have been to strengthen the current RCUK policies to make deposit in green repositories mandatory, making all UK-funded research freely available through repositories irrespective of whether the papers are published in open access or subscription journals. This would create an invaluable resource allowing all of the UK's research outputs to be searched, discovered, read, and knowledge contained within them build upon.
14. Support for the gold route, through the provision of funds to pay for article processing charges (APCs) where levied, could then have been included as a parallel strand, supporting those disciplines in which gold OA is more developed and encouraging its development in other disciplines.
15. The second area of concern in the Report of the Finch Group is around the length of time following publication before a paper can be made freely available. Any embargo period is a compromise for the benefit of the publisher. Research is most valuable when it is immediately available and delays inevitably reduce its utility.
16. RLUK supports the shortest possible embargoes and we should work towards a point where embargoes are zero. This is already the case in some academic disciplines. For example, in high-energy physics researchers routinely share their papers well before publication on the subject-based repository arXiv. These papers are read, digested and often cited by other researchers *before* 'formal' journal publication.
17. There have been concerns raised that shorter embargo periods could result in a fall in subscription levels, leading to the failure of journals. However, over the past fifteen years of increasing levels of open access there has been no evidence to support the contention that short embargo periods damage journals.

- a. As mentioned above, high energy physicists have been sharing their papers freely for 20 years. No physics publisher has reported any adverse effect on their subscription levels.
  - b. Many journals already make their archives freely available with embargoes as short as 3 months.
  - c. Almost all journals allow the deposit of author versions of manuscripts in repositories on publication (60% allow the peer-reviewed version, 27% the pre-peer-reviewed version)
  - d. Some journals, such as *Nature*, explicitly encourage authors to deposit their papers in repositories with a six month embargo.
18. It is clear that publishers would not make their archives available after short embargoes or allow no-embargo deposit by authors if they saw any effect on their subscription levels.
19. In 2012 the extensive €4 million, multi-year PEER project reported.<sup>3</sup> This EC-funded project run by the international publishing association, STM, looked to address the issue of embargo periods by comparing journals with different deposit rates and policies. It found no evidence to support the contention that journals in which authors made their papers freely available after embargo periods suffered any greater subscription loss than those that did not.
20. In the Report of the Finch Group there is a distinction made between STEM subjects and social sciences, arts and humanities. While the suggested embargo for STEM subjects is 12 months, for research in social sciences, arts and humanities the suggestion is 24 months. Unfortunately, these figures are not supported by any strong evidence and there is no evidence that supports the need for variable embargo periods for different disciplines.
21. The standard argument in social sciences and arts and humanities is that as these journals have a longer citation half-lives (a longer 'shelf-life') and papers are still referred to after a longer period they must have a longer embargo. However, evidence of long-term interest is no evidence of lack of short-term interest. Researchers in all fields want access to the latest research and will not tolerate their library requesting them to return in a year or two's time when the articles they want to read will be freely available. Therefore, despite the longer shelf-life of articles in some disciplines libraries will continue to take subscriptions.

## RIGHTS OF USE AND RE-USE

22. Currently, the electronic journals and databases that UK libraries purchase access to are sold under a bewildering array of differing terms and conditions. Some of these terms and conditions place limits on the numbers of simultaneous users of the products, the people within the institution who can have access, whether the university can offer access to walk-in users, etc. While there has been some efforts to standardise terms and conditions there is still a high administrative overhead in our institutions keeping track of the numerous variations.

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<sup>3</sup> <http://www.peerproject.eu/>

23. Therefore, RLUK welcomes the move to standardisation of terms under which UK-funded research will be made available. We also welcome the move to the most liberal licenses, including those from the Creative Commons. Scholarly research is at it's most valuable when it is widely distributed and widely built upon. The Creative Commons licenses, and in particular CC-BY, allows this wide distribution, while giving researchers the traditional protection of ensuring that they are attributed for their work.
24. The CC-BY license also allows for greater clarity around text and data mining. A report in 2012, *Value and Benefits of Text Mining*<sup>4</sup>, highlighted both the potential benefits of text and data mining in promoting science and research, together with the barriers. One of the most prominent barriers is the uncertainty surrounding the current copyright regime and to what extent mining content to which one has legal access is permissible. Moving to a CC-BY license removes that ambiguity and allows for text and data mining.

#### COSTS OF ARTICLE PROCESSING CHARGES (APCs)

25. It is acknowledged by all stakeholders that to move from the current, limited-access, subscription-based environment to a fully open access environment will take a number of years. This transition will be complex as institutions will have to simultaneously pay publication fees to make their own papers open access while still purchasing subscriptions to journals. We note that RCUK is only offering to cover 80% of publications costs and believe that this shortfall will inhibit the transition. We also note that a move to APC payments will place an added administrative burden on institutions and we call on RCUK to allow for flexibility in spending of block grant monies to cover these costs.
26. A long term goal of a shift to open access will be to realise a fully-functioning market in article processing charges. An effective market will result in the total system costs of scholarly communications being lowered for the UK.<sup>5</sup> As a community we require better monitoring of spending through all channels (subscriptions and publication) to ensure that we manage this transition successfully. RLUK is already working with other stakeholder groups to put in place effective monitoring procedures and we look forward to support from RCUK in calling for greater transparency and openness in publisher pricing.
27. In particular, it is important that any increase in spending by the UK research community on publication charges is matched by decreases in the subscription costs UK libraries pay. It would be unacceptable for publishers to 'double dip' and receive payment from the UK twice - both through subscriptions and article processing charges.
28. We welcome the commitment of RCUK to review the effects of the open access policy in 2014. However, we would urge for a careful review and monitoring throughout the five year transition period to pick up on any trends in changes of publication licensing, embargo periods, author publication patterns, effects on different

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<sup>4</sup> <http://www.jisc.ac.uk/publications/reports/2012/value-and-benefits-of-text-mining.aspx>

<sup>5</sup> <http://www.rin.ac.uk/our-work/communicating-and-disseminating-research/heading-open-road-costs-and-benefits-transitions-s>

disciplines, interaction with preparations for the next REF, etc and to ensure that any unexpected consequences do not undermine the policy drivers of wider dissemination and efficient modes of scholarly communication.

## WORLDWIDE UPTAKE OF OPEN ACCESS

29. Although the UK is a vital player in research internationally, our total contribution to the research literature stands at only 6% of all papers published annually. It is therefore vital to consider our position in relation to other countries and important to note that the RCUK policy is part of a world-wide move towards open access.
30. The world's largest non-military research funding agency, the US National Institutes of Health (NIH), invests over \$30 billion annually in medical research. It has had an open access policy for a number of years whereby researchers who receive NIH grants are required to make copies of their papers freely available after an embargo period. Researchers in the UK now have free access to this repository of over 2.5 million articles in biomedicine and the life sciences. Discussions regarding the possibility of extending this policy to other US federal funders are ongoing.
31. While the NIH is the largest single funder, other research funders from around the world are increasingly realising that the dissemination of research findings are an integral part of the research process itself. Many of them have put in place, or are developing, open access policies. Of particular note are the policies from Swedish and Norwegian research funders that share similarities with the RCUK policy. There are also similarities with the proposed policy developed for the next European Framework programme, Horizon 2020. In addition, many universities worldwide are adopting open access policies. The RCUK policy should be seen as part of a world-wide drive towards open access.

## CONCLUSION

32. Open Access allows universities to plug the information gap described above, allowing all UK researchers access to publicly funded research output. (It also has the welcome benefit of giving access to researchers at SMEs, teachers, journalists, policy makers, life-long learners, patients and the insatiably curious.)
33. Therefore, RLUK strongly supports the lead that the Department of Business, Innovation and Skills and the Research Councils are taking in the move towards a fairer and more efficient model of scholarly communication. RLUK will work closely with other stakeholders to implement the revised policy in as streamlined and effective manner possible.

On Behalf of RLUK

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