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Re: Brock University Response to the Tri-Agency Open Access Policy

Dear Tri-Agency members,

Attached please find a collective response based on feedback gathered from the Brock University

community by the Office of Research Services and the James A. Gibson Library.

Respectfully submitted by:

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Liaison/Scholarly Communication Librarian

TRI-AGENCY OPEN ACCESS CONSULTATION: OFFICIAL RESPONSE FROM BROCK UNIVERSITY

BACKGROUND

This report presents the collective perspective of researchers and other members of the Brock University community who participated in an online survey between Nov. 20 and Dec. 6, 2013. There were a total of 29 responses, though not every respondent answered every question. Ten respondents said they had received funding from NSERC and 10 from SSHRC; none reported having received funding from CIHR.

EXECUTIVE SUMMARY

Issues regarding Open Access in general, and a mandatory publishing policy in particular, appear divisive to members of the Brock community who responded to the survey. Asked if it is important for Canada's research funding agencies to support Open Access with a formal policy, 15 respondents agreed or strongly agreed, five said they were neutral and nine either disagreed or strongly disagreed.

SUPPORT FOR TRI-AGENCY OPEN ACCESS POLICY BY DISCIPLINE

Discipline	Agree or Strongly Agree	Neutral	Disagree or Strongly Disagree
Applied Health Sciences	1	1	1
Education	1		1
Humanities	1	1	
Mathematics & Science	3	1	4
Social Sciences	3	2	
Goodman School of Business	2		1
Library	4		
Other (non-declared)			2

The highest numbers of respondents expressing the strongest support for the policy were from the Library and the Faculty of Social Sciences; respondents from the Faculty of Mathematics and Science, meanwhile, were the most polarized, with four indicating disagreement and three demonstrating agreement.

Those supporting the policy commented that Open Access fulfils a public good and deemed the Tri-Agency policy a fair and reasonable proposal allowing Canada to join other nations with similar funding mandates.

Comments from those opposing the policy reflect grave concerns:

- the costs of publishing in Open Access journals, which may levy article processing charges in the range of $2,000, may pose significant financial challenges. This is particularly worrisome for researchers receiving small federal grants

- making Open Access publishing mandatory could restrict a researcher's academic freedom to publish where he/she chooses

- Open Access journals are perceived to be of lower quality than their subscription counterparts

As well, respondents who favour Open Access noted that the policy should be implemented gradually and carefully rather than rushed to meet an arbitrary deadline of Sept. 1, 2014.

The remainder of this report focuses on responses to specific sections of the policy, as requested by the consultation document. Survey responses were analyzed for themes and sorted according to evidence of support for the policy.

SECTION 3. POLICY STATEMENT 3.1 PEER-REVIEWED JOURNAL PUBLICATIONS

Grant recipients are required to ensure that any peer-reviewed journal publications arising from Agency-supported research are freely accessible within 12 months of publication, either through the publisher's website (Option #1) or an online repository (Option #2).

Responses	24
For	11
Against	10
Neutral	3

Respondents who supported this section of the policy commented that making publicly funded research openly accessible is a public good and is fair and reasonable. It may also increase researcher accountability. Option 2 is the favoured choice for making research openly accessible.

Some respondents cited concerns about financing and academic freedom in objecting to this section of the policy. They commented that open access publishing charges will be a crippling financial burden. "I will no longer be able to afford to publish in the respected journals in my discipline. Without journal publications, my grant will never be renewed. The policy effectively extinguishes my research career."

Researchers also commented that forcing them to publish in open access journals is an infringement of academic freedom. There were also references to the dubious quality of open access journals, which were called "junk journals" operated as "money grab schemes".

SECTION 4. APPLICATION

NSERC and SSHRC
Note: The implementation date of this policy is still to be confirmed, however, the Agencies are proposing September 1, 2014, subject to the results of the consultation.

Responses	19
For	9
Against	8
Neutral	2

Those favouring the projected implementation date called it "good timing" and there was one suggestion that the policy should be implemented immediately.

Most respondents who did not support the projected implementation date noted that September 2014 is too rushed: a more gradual approach was suggested so that researchers' and publishers' perspectives could be fur-

ther explored along with issues of copyright and intellectual freedom. Concerns over time needed to set up institutional repositories were also expressed. Others reiterated that the policy should be eliminated.

SECTION 5. POLICY SCOPE

This policy applies only to peer-reviewed journal publications. Book chapters, reports, monographs, editorials, or conference proceedings arising from Agency-funded research are not currently covered under this policy.

Responses	18
For	6
For – broader scope needed	5
Against	7

Respondents noting their support for the policy either agreed with the scope as is, or argued that it should be broadened to include all forms of research publications. "If the principle is that tri-council funded work should be more accessible, it should apply to all of (it)."

Those disagreeing with the scope again noted financial concerns with open access journal publications. It was suggested that other options for making research openly accessible might be more cost-effective than journal publications.

SECTION 6. MONITORING AND ADHERENCE

Grant recipients are reminded that by accepting Agency funds they have accepted the terms and conditions of the grant or award as set out in the Agencies' policies and guidelines. In the event of an alleged breach of Agency policy, the Agency may take steps outlined in accordance with the Tri-Agency Framework: Responsible Conduct of Research to deal with the allegation.

Responses	18
For	6
Against	11

Respondents expressed concerns with punitive enforcement, noting that the policy could limit academic freedom while creating more bureaucracy and paperwork. The cost of Open Access journal publishing was again mentioned as a major problem in complying with the policy.

Those in favour of the policy agreed with the statement concerning monitoring and adherence.

Others commented on the lack of clarity regarding monitoring and adherence. The Tri-Agency has provided no information on who is responsible for ensuring researchers comply with Open Access requirements nor any details on how infringements will be handled. Gradual implementation of the policy was recommended to make it easier for researchers to successfully comply.

GENERAL COMMENTS ON THE POLICY

Respondents reiterated their fears about the negative financial impact of mandated Open Access publishing, calling it a "death blow" to research in Canada. This is felt to be particularly problematic for highly productive researchers who receive small amounts of grant funding. These researchers fear they would accumulate sever-

al thousands of dollars in article processing charges every year to publish in Open Access journals and these fees would consume a large proportion of their grant budgets.

Favourable comments cited the policy as a progressive measure allowing Canada to join the ranks of other nations with Open Access policies, such as the U.K. The need for an infrastructure of digital repositories was mentioned as crucial for successful policy implementation.