
RCUK Policy on Open Access and Supporting Guidance

Institute of Physics response to a RCUK
policy document

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consultations and inquiries can be viewed at
www.iop.org

20 March 2013

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Alexandra Saxon
Head of Communications
Research Councils UK
Polaris House
North Star Avenue
Swindon SN2 1ET

IOP Institute of Physics

Dear Ms Saxon,

RCUK Policy on Open Access and Supporting Guidance

The Institute of Physics is a leading scientific society. We are a charitable organisation with a worldwide membership of more than 45,000, working together to advance physics education, research and application. We engage with policymakers and the general public to develop awareness and understanding of the value of physics and, through IOP Publishing, we are world leaders in professional scientific communications.

The Institute welcomes the opportunity to offer its input to inform RCUK's policy and guidance on open access in the attached annex.

If you need any further information on the points raised, please do not hesitate to contact me.

Yours sincerely,



Professor Peter Main
Director, Education and Science

RCUK Policy on Open Access and Supporting Guidance

General issues

1. Both from a scientific and a publishing perspective, the IOP recognises and supports the principle that the results of publicly funded research should be made as widely available as possible. However, we feel strongly that the transition from the current arrangements to an open access (OA) model needs to be carefully managed to ensure sustainability in terms of the publishers' business models and to maintain the quality of the scholarly record.
2. In addition, we are of the firm view that the additional costs of implementing an OA policy in the UK must not be met by diverting money away from the Science Budget which, despite currently being ring-fenced, is being eroded on an annual basis due to inflation. It is imperative that if the government wants the UK's science base to move to an OA model, then it needs to source the requisite additional funding without placing a burden on existing allocations to the research councils and the funding councils, which are already under considerable pressure.
3. IOP would like to point out that the surplus from publishing made by charities such as the learned societies allows them to support science, business and education in a way which is valued by many stakeholders, including government and the research councils. Indeed, the Finch Group report clearly recognised the value of the UK's learned societies and, while we cannot expect any preferential treatment over other publishers, we would ask that the transition to OA is not carried out so precipitately as not to allow us to develop a sustainable business model. IOP, in common with most subject societies and professional bodies, receives no direct public funding for its core programme and without the income from publishing, the majority of our charitable activities would cease.
4. The government largely accepted the Finch Group's recommendations for a balanced package of measures in the transformation to OA. At present, RCUK has not taken that message completely on board. It would be of great benefit to all concerned, universities and publishers, if RCUK was able to formulate and implement clear policies consistent with the Finch Group's recommendations, as it essential that there is the greatest possible clarity for researchers on policy and its implementation as the UK pioneers this radical transformation of scholarly communications.

Introduction

5. We welcome RCUK's statement that: "...the journey to full Open Access is a process and not a single event..." and we especially welcome the inclusion of the decision tree in the revised policy and guidance which the government has endorsed as reflecting its policy; this will be particularly helpful to researchers and their institutions and publishers in the transition period during which there will be insufficient funding for gold OA publication of all relevant papers. However, some of the language used in the revised policy and guidance is not wholly compatible with the decision tree and we make recommendations below on how this might be improved, in the interest of improving clarity.

6. All of IOP's owned journals are fully compliant with RCUK's gold OA policy, making the final published version immediately universally accessible under a CC-BY licence on payment of an article processing charge (APC). We are working with our partner societies, whose journals we publish on their behalf, to make their journals compatible with RCUK policy, as well; we will be better able to do this when we have full clarity on that policy.

Embargo periods

7. The text of the revised policy and guidance fails to reflect both the simple choices for an author set out in the decision tree and government policy, which states clearly that general embargo periods of only six months are unsustainable. As the Minister for Universities and Science, David Willetts MP, stated at a conference on OA at the Royal Society on 25 February 2013: "Green with a six-month embargo is not a sustainable option...someone has to pay for academic publishing." He has reiterated this view elsewhere. RCUK's policy and guidance appear to be out of alignment with government policy on this.

8. The text of 3.6(i) – "...RCUK recognises that embargo periods are currently used by some journals with business models that depend on generating revenue through journal subscriptions. Therefore, where a journal does not offer an immediate Open Access option, RCUK will accept a delay between on-line publication and a paper becoming Open Access of no more than six months." – ignores the fact that the great majority of articles are published today in subscription-based journals and that most of those journals operate an embargo period of longer than six months. The second sentence simply does not follow from the first. It would be helpful if RCUK recognised that the starting point for its journey is a primarily subscription-based world and that until full funding is available to pay the costs of gold OA, its green policy will be largely unworkable.

9. The text of 3.6(iii) likewise suggests that embargo periods of longer than six months, as set out in the decision tree, will be required only in exceptional circumstances: "...in some circumstances, where funding for APCs is unavailable during the transition period, longer embargo periods may be allowable". RCUK's policy and guidance need to recognise that as long as there is insufficient funding to meet the costs of publishing all papers on a gold OA basis, these circumstances will apply to a large number of papers.

10. The text of 3.6(iv), in its reference to "non-STEM disciplines", implies that a six-month embargo period would be sustainable for STEM journals. RCUK has no basis for implying this. IOP's own journals in physics typically have a usage half-life of four years, and in mathematics it is eight years. Under a six-month embargo most usage would take place after articles were made freely available and we would expect to see substantial cancellations of subscriptions, endangering the viability of IOP Publishing and ultimately that of IOP itself. Government policy requires a 12-month embargo in STEM and, in the absence of funding for an author to pay an APC, RCUK's policy and guidance need to mirror this.

11. RCUK must revise the text of its policy and guidance to harmonise it with the choices for authors set out in the decision tree, otherwise there is a distinct danger of authors falling foul of the policy inadvertently. Green OA with a six-month embargo in STEM disciplines applies primarily in circumstances in which the author has funding available to pay an APC but the author's preferred journal does not support the gold model; in this case publishers have accepted the short embargo. Where the journal is

compliant with RCUK's gold OA policy but the author has no funding to pay an APC then in all cases the embargo period is extended in STEM disciplines to 12 months. In the early years of transition, when RCUK's block grants cover, by their own estimates, less than 50% of relevant papers, then it is likely that the majority of papers in physics will be published via the green route with an embargo of 12 months. RCUK's policy and guidance need explicitly to recognise this, in the interests of clarity for authors.

Licences

12. We welcome RCUK's recognition at 3.7(iii) that concerns exist regarding the blanket requirement to use the CC-BY licence for gold OA publication. While IOP has adopted this licence for its own gold OA publishing, it too has encountered concerns about the requirement for this specific licence in its discussions with its author communities and with some of its overseas society partners. We recommend that RCUK exercises flexibility over its requirement for the licence until concerns from the research communities are fully addressed.

13. RCUK sets out a range of options for the user licences to apply to green OA publication, expressing a preference for CC-BY and a minimum requirement of CC-BY-NC. To the best of our knowledge there has been no substantive discussion by RCUK with publishers, learned societies and others on this and we urge RCUK to engage in such discussions. IOP has not yet finalised its policy in this area but will not implement CC-BY for green OA and has reservations over a blanket requirement for CC-BY-NC.

Reviews of the policy and implementation

14. IOP welcomes RCUK's commitment to review its policy in 2014 and, we would hope, at regular intervals thereafter. We believe it is essential that any such reviews are undertaken with the full collaboration and involvement of other stakeholders, including the learned societies and scholarly publishers.

Article Processing Charges

15. RCUK's revised policy and guidance on this states that: "...the payment of APCs and other publication charges related to Research Council-funded research are supported through RCUK OA block grants..." RCUK needs to clarify which "other publication charges" might be met from block grants. For example, some journals make authors pay page charges or other charges (such as for colour diagrams). In such cases, can the block grants be used to pay page charges and a supplementary charge to cover gold OA publication?

International collaborations

16. Much research in physics is conducted by collaborations of researchers from multiple countries with multiple sources of funding. RCUK's policy and guidance is silent on how research emanating from such collaborations might be published. Does RCUK envisage that it would cover the entire cost of gold OA publication in cases where one of the authors received funding from RCUK? How does RCUK envisage addressing collaborations in which the requirements of one funder differ from those of another; or where the requirements of one funder might even be incompatible with the law of the country of another author?

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IOP Institute of Physics

76 Portland Place
London W1B 1NT

Tel: +44 (0) 20 7470 4800

Fax: +44 (0) 20 7470 4848

Email: physics@iop.org

Website: www.iop.org

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