

The Hague, August 22nd, 2005

Professor Ian Diamond Chair, RCUK Executive Group Councils UK Secrerariat Polaris House North Star Ave Swindon SN2 1ET

Re.: ACCESS TO SCHOLARLY RESEARCH: AN STM RESPONSE TO THE RCUK PROPOSAL

Dear Professor Diamond,

The International Association of Scientific, Technical and Medical Publishers ("STM") welcomes the debate and discussion concerning access to scholarly research as outlined in the May 2005 Research Council UK (www.rcuk.ac.uk) statement on the dissemination of and access to journal articles and conference proceedings. STM member publishers have made significant investments in electronic infrastructure and innovative licensing programmes to improve research access and to drive down the cost of access, the results of which are demonstrably and dramatically improved access to research journal content.

STM represents nearly 100 professional and scholarly publishers from 26 countries, including the UK, and includes commercial and not-for-profit organisations, representing many who experiment with "Open Access" programmes as well a variety of other business models. The STM sector is vital in evaluating and communicating the latest research results in the fields of pure and applied science, medicine and technology, and thereby supporting innovation in medical treatment, consumer and industrial products, product design, telecommunications and computing. STM is 'business model neutral' and does not favour one model over another. Its overriding concern is that business models must prove to be optimally of service to all constituencies and that decisions and choices are made freely by those constituencies based on open evaluation, not ideology or belief, and without government intervention or mandates.

STM member publishers have developed and continue to develop innovative and accessible business models to broaden information access such as:

- freely accessible abstracts or summaries;
- flexible subscription licensing arrangements for electronic journals;
- "pay per view" article access for those unable to subscribe;
- in some cases an "author pays / open access" option for the whole journals programme, in other cases for selected journals and /or scientific disciplines
- the implementation of discovery tools such as links to articles in thousands
 of journals from hundreds of different publishers (through CrossRef, see
 www.crossref.org) and novel searching tools;

- the establishment of standards and methodologies for electronic preservation (including archival linking); and
- the development of PatientINFORM projects with the American Cancer Society and the American Heart Association, and related projects such as the Diabetes Learning Center. This initiative will be expanded to other diseases and to other countries (including the UK) and assists patients to expert information on and free access to the latest articles on their particular ailment.

STM publishers have also formed and been significant contributors to projects such as HINARI and AGORA to ensure broad access to core health and agriculture materials for developing countries.

The four RCUK principles

STM fully supports the four fundamental principles for scholarly and research publishing identified by the RCUK. These can be summarized as follows: (1) widespread and rapid access to publicly-funded research ("public funding should lead to publicly available outputs"); (2) journal specific quality control assurance through rigorous peer review procedures; (3) efficiency and cost-effectiveness (publishing should be cost effective, financially sustainable and able to take full technological advantage of new discovery tools); and (4) long-term preservation and archival access, undiminished in quantity and quality. We find the RCUK recommendations for online subject matter and institutional repositories, requirements for publicly-funded authors to deposit articles in such repositories, and apparent support for open access (author pays) journal business models rather intriguing non sequiturs, as if the current publishing environment does not and can not possibly adhere to the four requirements noted above.

In our view, the RCUK conclusions are precipitous and lack scientific rigour. They appear to presuppose that there are unsolvable problems in the current scholarly information system, without debate or analysis, and without apparently considering the enormous strides that have already been made and continue to be made towards full adherence to the above principles. New solutions are then proposed without analysing the likely results and impact on the current information infrastructure and without apparent concern for the continuing quality of service to the scientific community. As we will demonstrate below, we think it far more likely that the creation of a new more routinised publishing system through RCUK-mandated repositories and systems as proposed will decrease diversity in journals and the peer review process, will threaten the value of investments made by STM publishers, and will improve neither access nor quality for scholars. The proposal will also exacerbate the nascent problem of differing versions of research papers existing on multiple systems, with researchers unsure as to which version has been subject to peer review and editorial rigour.

There is substantial and compelling evidence that the current publishing and licensing systems of STM publishers, combined with the practices of major institutions and resources such as the British Library, the NESLI and JISC national model licences, and the major university libraries, have created a vibrant research infrastructure in the UK in which all four RCUK principles are embodied and are functioning with enormous success. There is no evidence to the contrary, although

there are concerns about appropriate budgeting to support ever-increasing research outputs.

1. Access

The Publishers Association survey from January 2005 on "University Library Spending on Books, Journals and Electronic Resources" (the "PA Survey")¹, notes that the number of scholarly journal subscriptions has essentially doubled over the past five years, from approximately 550,000 nation-wide in the 1998-1999 school year to approximately 1,100,000 in 2002-2003 (the last year for which there is data). This is presumably in addition to access to purely electronic journal content (as some UK institutions have switched from print plus electronic access to electronic-only). A recent article by Simon Bevan in the July 2005 issue of *Serials*² described a recently concluded JISC study on the effect of current "big deal" journal licencing practices in the UK (NESLI), indicating that the number of downloaded articles increased by 42% from January 2003 through June 2004, to a total of 2,200,000 articles. The same report went on to state that the cost for access was described in the survey as low in relation to interlibrary loan costs and current payper-view charges.

These figures are confirmed by the feedback from researchers themselves as reported in the 2004 study "Scholarly communication in the digital environment: what do authors want?" (the "CIBER survey")³, where 76% of researchers report that access is significantly easier than five years ago. The Government itself, in its November 2004 response (the "UK Government Response")⁴ to the report of the Science and Technology Committee of the House of Commons called "Scientific Publications: Free for All?", noted that it did not see any "major problems in accessing scientific information", nor "any evidence of a significant problem in meeting the public's needs in respect of access to journals..." The Government further noted that "increasing amounts of material become accessible from the researcher's desktop," with the annual volume of downloads from UK publisher's material reaching 1 billion per year.

With respect to access through public libraries and university libraries, the UK Government Response lauded the British Library's document supply service and criticised the practices of academic libraries in restricting public access. Public access through "walk-in" license provisions are permitted by most STM member publisher licenses, as well as the NESLI and JISC model licences.

Notwithstanding the fact that most STM member publishers permit authors to deposit their works⁵, in some form, in the authors' institutional repositories ("IR" or "IRs"), such repositories do not appear yet to have created a substantial archive of research material. Only about a fifth of the CIBER survey respondents had

 $\frac{http://www.publishers.org.uk/paweb/paweb.nsf/0/460034df9bc9868b80256ffe003fddbf/\$FIL}{E/University\%20Library\%20Spending\%20Update\%202005.pdf}$

¹See

² "How usage statistics can inform national negotiations and strategies", Bevan et al., *Serials* 18-2 (UKSG), July 2005.

³ See http://www.ucl.ac.uk/ciber/documents

⁴ See http://www.publications.parliament.uk/pa/cm200304/cmselect/cmsctech/1200/1200.pdf

⁵ See the Romeo project on the Sherpa site, http://www.sherpa.ac.uk/romeo.php?all=yes

deposited any type of material in an IR (and only a small minority were research papers), and many expressed doubts about the viability of IRs. The UK Government Response is supportive of IRs, but notes that uncertainties exist about costs, technological aspects, coverage or scope, and quality. Institutional repositories do not seem to be able to provide improved access to verified research results, and the potential costs to improve such repositories to enable them to be successful have not been analysed properly to determine whether they are significantly less expensive than current publishing models.

Finally, it needs reminding that 'public access' does not necessarily mean 'free access', in the same way as 'public transport' does not mean 'free transport', even though in this country tax payers seem to contribute as significantly to the latter as they do to scientific research. The concept of 'reasonable access' is probably more appropriate in this case.

2. Quality Control

Researchers report a high level of trust in existing peer-reviewed journals. Existing open access journal publishers such as BioMedCentral and the Public Library of Science (PLoS) emphasise their peer review systems as important "selling points". STM is not aware of any assertions, proposals or studies that suggest that existing STM publishers are not doing an effective job in coordinating the peer review system for their journals. Quality can always be improved, but it is difficult to imagine how author-pays business models or repositories will be more effective with respect to quality than existing publishing systems. Mandating a centralised peer review system for repositories will not be an improvement on the current journal-based and highly diverse review procedures. In fact, the argument has often been made (and never successfully refuted) that the mixing of scientific and financial barriers to an author accessing the journal of his/her choice may lead to unintended consequences with respect to reviewing standards.

3. Cost

The enormous increases in access noted above, largely resulting from electronic access and innovative licensing schemes, have not involved commensurate cost increases. The PA Survey, which as noted above identified a greater than 100% increase over the past five full school years in available subscriptions, described only an approximately 40% increase in journal expenditures. The UK Government Response indicated that an explanation may be that "bundling deals do provide a means of increasing value", and noted that "spending on journal subscriptions continues to be only a small proportion of [the higher education sector's] total research costs... equat[ing] to 1% of HEFCE funding."

Many reports have now indicated that major research institutions would have to pay more for author-pays business models than in the traditional subscription models. The UK Government Response noted "that the UK would end up paying more being a net exporter of scientific information" given the large number of UK researchers and the volume of UK research output. The Government notes that the UK generates "5.3% of articles to global STM journals, but only contributes 3.3% of the global subscription market." Any alternative business models, including the author-

pays model, would have to deal with the difference between research output and current subscription expenditure. The Government report concluded that it "has seen no convincing evidence that the author pays model would be cheaper to operate than... under the current model." Finally, the Government also identified the problem of industry "free riders", noting that in an author pays system, companies would pay less (as they consume more than they produce), and would thus force the Government to pay more.

The cost of maintaining a large number of independent repositories, especially ones that would have substantial scale, is likely to be significantly higher and less cost-effective than current publisher-hosted systems.

STM agrees that there are significant and important concerns about the ever-increasing gap between the relatively high level of research funding, resulting in ever-increasing output of research results, and the relatively static level of library funding. This issue deserves serious debate and consideration, but the RCUK proposals do not seriously address these issues, if at all.

4. Archival issues

The British Library maintains one of the most complete academic libraries in the world, and the university research library community is similarly focused on preservation. Many UK university libraries now have access to very large collections of STM journals. With respect to digital archiving, most STM member publishers have made significant commitments to maintaining an internally-hosted permanent archive of their publications, and many have made arrangements with the Royal Library of the Netherlands, in the Hague, for an external archival deposit. STM member publishers are highly supportive of the archival mission, and many have had discussions with the British Library on archiving similar to the project with the Royal Library.

The cost of duplicating such archives in digital form on various e-repositories, as appears to be suggested by the RCUK, is daunting and unnecessary. Although such decisions in the context of institutional repositories are ultimately the prerogative of the individual institutions, such policies ultimately would require the UK tax payer to foot the (double) bill.

Conclusion

Scientific disciplines differ widely in their scholarly communication practices. Journals differ from one another in their editorial content, features, sales models, and how they serve the needs of their specific research communities. As noted, many STM members are currently experimenting with business models that incorporate elements of "Open Access" principles, whether in permitting authors to self-archive their papers on open institutional web sites, in providing open web sites for journals, or in providing such access via the Internet for journal issues within a certain period of time selected by the publisher as relevant for the particular scientific discipline. Some STM members have been engaged in Open Access journal projects for many years, although not (yet?) in ways that demonstrate significant longevity and sustainability. Generally these programs continue to require subsidy

funding of one kind or another, and in that sense require publishers or sponsors with substantial funding capacities.

The multitude of business models that have emerged over many years serve the needs of authors and customers by ensuring the wide and continuous dissemination of consistently high-quality, independently validated research, and we welcome new publishers and new business models to our markets. We see nothing new in the RCUK proposal other than unfunded mandates that arbitrarily favour some models over others.

STM submits that the research community, and the four RCUK principles, are well served by the many dynamic business models that are currently in existence and experimented with, as a result of competition and innovation, in the marketplace.

In summary, STM believes that it would be in the interest of the research community and the broader community as a whole if STM and RCUK start a serious and systematic dialogue, based on the mutually agreed "four principles", by jointly assessing and evaluating areas where the research information infrastructure can be improved and working with both the publishing and research communities to achieve this, including by the development of mediation and investigative bodies for research ethics issues, the support of the development of technical standards to identify versions and forms of research papers, and the like. This way we can all avoid the trap of prematurely promoting solutions that are based on unproven assumptions.

Yours sincerely,

Pieter S.H. Bolman, PhD Chief Executive Officer

London office per September 1st, 2005 Suites 301-302 344-354 Gray's Inn Road Kings Cross, London WC1 8BP