

Extended feedback on draft Amsterdam Call for Action

[STM](#) is an international association of over 120 scientific, technical, medical and scholarly publishers, collectively responsible for more than 60% of the global annual output of research articles, 55% of the active research journals and the publication of tens of thousands of print and electronic books, reference works and databases. We are the only international trade association equally representing all types of STM publishers – large and small companies, not for profit organizations, learned societies, traditional, primary, secondary publishers and new entrants to global publishing.

As was emphasised at the Amsterdam conference, publishers are committed to continuing to work collaboratively with all stakeholders to further the successful and sustainable development of Open Science. In so doing publishers can bring significant international experience to ensure that specific detailed policy elements do not, in the long run, undermine our joint aim of ensuring science is more reliable, efficient, and responsive to societal challenges.

We welcome the opportunity to make a contribution to the consultation on the Amsterdam Open Science Call for Action, and further to our press release issued 8 April, we have the following constructive feedback on the document designed to strengthen and enhance the proposals.

1. Assessment, evaluation and reward systems in science

We note concerns expressed during the conference about the use of existing measurements for article assessment. We agree that article level metrics can play an important role in adding to the measures currently used as a marker of quality, for example the impact factor. We favour a holistic approach, using a variety of robust measures, and stand ready to respond to the wider research community if and when agreement is reached on the types of alternative metrics that might play a useful role in assessment and evaluation. Publishers have actively responded to community demand for citation principles for data, and a number of publishers have endorsed the [Joint Declaration of Data Citation Principles](#) to ensure researchers get proper credit for their work.

2. Facilitate text and data mining of content

Publishers are actively supporting researchers who wish to text and data mine both individually and collectively, through cross-industry initiatives such as [CrossRef TDM](#). The claim that it is not currently possible to mine legally accessible content made available by academic publishers is not correct, as publishers are already doing just this. TDM is a clear case where legal services are already available and should be encouraged rather than undermined by unnecessary copyright exceptions.

3. Improve insight into IPR and issues such as privacy

In line with the [STM Declaration on research data](#) publishers are actively supporting researchers to make their research data freely available should they wish to do so. We are also mindful that there are circumstances in which data should not be made open, for example where there are concerns over privacy, security or intellectual property. There may also be discipline-specific exceptions or considerations that need to be taken into account. We look forward to continuing to support researchers to comply with data mandates as they evolve and to working closely with funding bodies as their plans evolve, to ensure these are workable.

4. Transparency on the costs and conditions of academic communication

There is a vibrant publishing market, with vigorous competition between publishers for authors, and the nascent open access market should be left to evolve naturally. Publishers are bound by and

respect competition law and do not share pricing information. However we are actively engaged in discussing varying models and partnerships with stakeholders. It should be noted however that a transition to open access and to open science will cost money and the suggestion that transparency on costs will reduce these is misplaced.

5. Introduce FAIR and secure data principles

In addition to supporting researchers to make their research data freely available should they wish to do so, publishers are developing tools and services to support researchers and funders to achieve their open data ambitions. To make data truly reusable requires coordination and cooperation amongst stakeholders and publishers have an important role to play in leveraging existing infrastructure, minimise cost and duplication of effort, and as an enabler of open and effective data.

6. Set up common e-infrastructures

We welcome further information on and engagement around a European Open Science cloud for data and want to ensure where possible, to minimize costs and avoid duplication of effort. We welcome the opportunity to contribute to these plans through the Open Science Policy Platform. We would strongly caution against duplication of effort in the field of open access to publications where myriad services already exist to support this. Publishers have invested for decades in robust, global-scale, and open infrastructure for the wide dissemination of scholarly articles and related data. Rather than duplicating this effort, opportunities for collaboration and partnership can and should be embraced as they are being in the way the United States implements its public access policies. A comprehensive audit of existing services should take place in advance of proposals to avoid redundant efforts at unnecessary additional cost and effort.

7. Adopt Open Access principles

Traditional publishers are open access publishers too and are intrinsic to the global transition process. Any transition to open access publishing where costs are paid up front – often called gold open access - will cost research intensive countries more than the current system. Therefore, the key point is that a transition to this form of Open Access must be shared by all stakeholders – universities, funders, researchers, policy makers and publishers.

In an environment where little or no additional money is available to support the transition to open access publishing, this means that the cost of the transition must be supported by the current subscription business model. In this type of open access, often called green open access, embargo periods are a necessary compliment to support open access and the high quality journals researchers choose to publish in. Publishers aim to support and develop a positive, diverse, flexible, interoperable and sustainable scholarly communication environment that includes Green OA policies that do not risk undermining sustainable funding for publication of the version of record (such as journal subscriptions), in the absence of clear evidence of the impact of Green OA in the longer term.

We stand ready to work with all stakeholders to continue to develop principles and actions to support a sustainable, workable transition to open access that ensures researchers can continue to exercise their academic freedom to publish in high quality journals. A transition to full open access by 2020 will only be possible if there is the necessary funding and support from all stakeholders to support a sustainable and workable transition.

8. Stimulate new publishing models for knowledge transfer

As noted above, traditional subscription publishers are open access publishers too and have consistently launched new fully gold open access journals alongside adapting the existing subscription model to additionally offer gold open access publication options in high quality journals, often known as ‘hybrids.’ As noted at the Open Science conference, there are thousands of publishers all competing for the very best authors in a diverse and healthy market. Publishers are also involved in initiatives to support the broader engagement of society in science. This includes through, for example, the Public Library Initiative in the UK, which provides free walk-in access for

public library users, alongside initiatives such as Research4Life, which provides low or no-cost access to scholarly articles. Publishers also open up content during disasters or emergencies, for example during the ebola crisis and spread of the Zika virus and have developed resource centres on their platforms to support research in these areas.

9. Stimulate evidence-based research on innovations in open science

Publishers welcome the opportunity to contribute to the collection of an evidence base to inform decision making and a coordinated stakeholder approach for mainstreaming open access.

10. Develop, implement monitor and refine open access plans

Publishers operate globally and therefore have a wealth of experience and information they can share with other stakeholders to inform the transition to open access. Whilst unification around one single open access policy is an understandable desire, the key element of success remains sustainability, be that through additional funding necessary to support gold open access or the utilisation of sustainable embargo periods that enable the subscription model to continue to operate and therefore support green open access.

11. Involve researchers and new users in open science

Publishers are in the business of working closely with the research community to support their publication, research data and other requirements. Publishers have also developed new ways of engaging both researchers and the wider community in open science, for example through the publication of lay summaries of articles analysing important research and through the opening up of scholarly communication to wider public audiences, for example through the Public Library Initiative in the UK. 206 local authorities are participating in the scheme, which provides free walk-in access to research at public libraries nationwide. Over 10 million articles are available through the Public Library Initiative from over 20 publishers, across subjects including art, architecture, business, engineering, history, languages, politics, philosophy, mathematics and the sciences.

12. Encourage stakeholders to share expertise and information on open science

We agree that more work is needed to explore and reach consensus on how open science can evolve. Publishers have a vital role to play in this and welcome the opportunity to continue the dialogue with all stakeholders to work towards our joint aim of ensuring science is more reliable, efficient, and responsive to societal challenges.

Respectfully Submitted



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STM

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