

Lord John Krebs
Chair of the House of Lords Science and Technology Select Committee
Science and Technology Select Committee
Committee Office
House of Lords
London
SW1A 0PW

From the Physical Secretary and Vice-President Professor John Pethica FRS

18 January 2013
Our ref: SciB/LD/OA/0113

Dear Lord Krebs

House of Lords Committee of Science and Technology consultation on Open Access publishing

The Royal Society has noted the Committee's consultation on Open Access with interest. This is an area in which the Society performs two relevant roles: one as the national academy of sciences and funder of research, and the other as a publisher.

In keeping with our role as the UK's national academy of science, the Royal Society is committed to the widest possible dissemination of research outputs. Consequently, our own publishing operation is one of the most open access of all science publishers. We offer the following types of open and free access to our journal articles;

1. *Gold open access*: Through *EXiS Open Choice*, authors may have their article made freely available to all, immediately upon publication, by payment of an article processing charge (APC). Such articles are covered by a Creative Commons license allowing redistribution and re-use, and we deposit them in [PubMedCentral](#)¹ on the author's behalf. *Open Biology*² is an entirely open access journal, where there are currently no charges to the author (although this will increase to a regular charge of £1200), the Creative Commons license applies here, and articles are also deposited in PubMedCentral on the author's behalf.

The Royal Society also offers an [open access membership programme](#)³ that enables academic and research institutions, funders and corporations to actively encourage open access in scholarly communication. Our membership programme grants a saving of 25% on all article-processing charges, allowing authors at member institutions to publish more content as open access, growing the institution's research exposure and citation of articles.

¹ <http://www.ncbi.nlm.nih.gov/pmc/>

² <http://rsob.royalsocietypublishing.org/>

³ <http://royalsocietypublishing.org/site/librarians/membership.xhtml>



2. *Green open access*: Authors may deposit a *pre-print* or a final, accepted manuscript version (*post-print*) of their article in a repository at any time.
3. *Delayed free access*: Articles more than 12 months old (biological sciences) and 24 months old (physical sciences) are freely available to all. This excludes articles in the Digital Journal Archive published between 1942 and 2002.
4. *Developing world access*: The Royal Society is a partner in a number of international schemes operated by the UN and WHO to make scientific journal articles available immediately and free of charge to the world's poorest nations. We currently belong to the following schemes: [PERII/INASP](#)⁴, [HINARI](#)⁵, [AGORA](#)⁶ and [OARE](#)⁷.

The Society also offers a waiver of article processing charges to Royal Society funded research fellows if they publish in one of the Royal Society journals.

In July 2012, the President of the Royal Society welcomed the publication of the Finch report on expanding access to published research findings. In a published letter to the Minister of State for Universities and Science (available on the [Royal Society website](#)⁸), Sir Paul highlighted the importance of publishing income to the Royal Society, and other learned societies, and the valuable reinvestment in science that this allows these organisations to undertake. He urged that a sustainable model for OA publishing be developed, which, through APCs and appropriate embargo periods, would allow scholarly publishing to flourish.

RCUK Open Access Policy

The Royal Society welcomes the government's commitment to move to an open access model of publication as there are potentially huge benefits to the research community and society in general.

Now that the details have been published of the method of distributing funds from RCUK to the research institutions to cover costs, it is clear that this will effectively impose a limit on the number of articles a given researcher may publish in 'gold' open access mode. On the basis of the number of RCUK funded scientists and the average number of articles they publish per year (26,000 peer-reviewed research papers between 2010-2011), it has been estimated that the cost to RCUK of funding 100% of APCs in full would be of the order of £55m per year (average cost APC article of £1727 plus VAT). The current assumption by RCUK is 45% compliance with the mandate in the first year for which £17m has been allocated (1 April 2013 to 31st March 2014)⁹. Once this money has been spent, the universities will be expected to cover the cost of APCs or the authors will be expected to comply via the green route. It is as yet not clear how articles with multiple authors will be funded, i.e. which author pays the APC.

The Royal Society has noted a number of issues that require clarifications. The principal concerns are;

1. That the level of funding provided will not meet the demand to publish via the gold route.

⁴ <http://www.inasp.info/file/5f65fc9017860338882881402dc594e4/perii.html>

⁵ <http://www.who.int/hinari/en/>

⁶ <http://www.aginternetwork.org/en/>

⁷ <http://www.unep.org/oare/en/>

⁸ http://royalsociety.org/uploadedFiles/Royal_Society_Content/Downloads/News/Royal%20Society%20Letter%20on%20Finch%20report.pdf

⁹ <http://www.rcuk.ac.uk/media/news/2012news/Pages/121108.aspx>

2. The potential impact on learned societies' publishing income from those authors forced to "go green".
3. How institutions will distribute the funds to researchers.
4. What happens in the case of multi-authored articles (especially where co-authors are not RCUK funded and/or from outside the UK).
5. How RCUK will work with publishers to ensure their copyright conditions do not undermine the RCUK definition of Open Access by preventing text and data mining.

Depending on how these issues are addressed, a number of unintended consequences may arise from the new policy;

1. Authors may find they have to publish in 'green' mode and accept an embargo.
2. Authors may not be able to publish in some journals at all (if those journals do not meet RCUK criteria). This may be a significant problem in small fields.
3. The extra impetus towards green open access caused by inadequate levels of gold funding may lead to subscription cancellations and loss of income to learned society publishers.
4. Downward pressure on APCs (due to limited funds) may damage journals from smaller society publishers who may not be able to meet their costs.
5. There may be pressure on high rejection journals (whose publishing costs per article are higher) to change their peer review standards in order to be able to set more competitive APCs.
6. Authors may feel pressured (as a consequence of limited block grants) to choose journals with cheaper APCs and lower standards of peer review.
7. If text and data mining are inhibited by publishers, the benefits of past results for future research may not be optimised.

The Royal Society with the Academy of Medical Sciences, Society of Biology, Royal Society of Chemistry, Institute of Physics, and Institute of Physics Publishing will be holding a conference to discuss these challenges on the 25th February, titled *Open Access in the UK and what it means for scientific research*, at the Royal Society.

The Royal Society continue to be interested in Open Access and await the outcomes of the Committee's review. If you have any questions about our policy please contact Stuart Taylor, Commercial Director (stuart.taylor@royalsociety.org), who will be able to assist you. We also look forward to discussing the committee's findings at the Open Access conference in February, to which I understand you have been invited.

Yours sincerely,



John Pethica FRS
Vice-President and Physical Secretary