

From: slotinga
Sent: 23 June 2021 12:44
To: UKRI CEO
Subject: 981 UKRI Open Access Review
Attachments: The practical implications of UKRI's proposed open access policy - June 2021 .pdf

Dear Ottoline,

I am writing in relation to UKRI's review into Open Access, to share a number of urgent concerns that have not yet been addressed by the review process.

Specifically, we would like to emphasize the practical implications of the policy proposals on the UK's research sector. As outlined in the attached, we believe that the current policy will lead to:

- Increased confusion for researchers.
- Significant restrictions on researcher choice and academic freedom.
- Researchers left without funding to publish.
- The fundamental undermining of OA progress to date.

Publishers are already on track to deliver nearly 90% open access coverage by 2022. We therefore urge UKRI to reconsider, before pushing through a policy that risks the progress to date.

I would welcome a meeting with you to discuss the attached further. I do hope your diary will be able to accommodate a short discussion.

Kind regards,
Stephen

Stephen Lotinga
CEO
Publishers Association

publishers.org.uk



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The practical implications of UKRI's proposed open access policy for the UK's research sector.

A note from the Publishers Association regarding the reality of the impact of UKRI's imminent Open Access policy and suggested next steps.

Executive Summary

Publishers support UKRI's goal of achieving full and immediate open access to 100% of articles arising from UKRI funded research.

Recent analysis indicates that constructive engagement and innovative thinking between UK funders, institutions and publishers has put us on a collective course to deliver nearly **90% open access coverage by 2022**, largely through transformative agreements.¹

However, as UKRI's review into its open access policy draws to a close, we remain concerned about the practical implications of the policy as proposed. One element of the policy will undoubtedly create inefficiency, through additional administration for UK researchers and will undermine effective management of the peer review process. These significant risks and their associated impacts are not only unnecessary but harmful, given the progress already made in delivering widespread open access publishing in the UK.

Specifically, we anticipate:

1. **Increased confusion for researchers.**
2. **Significant restrictions on researcher choice and academic freedom.**
3. **Researchers left without funding to publish.**
4. **OA progress will be fundamentally undermined.**

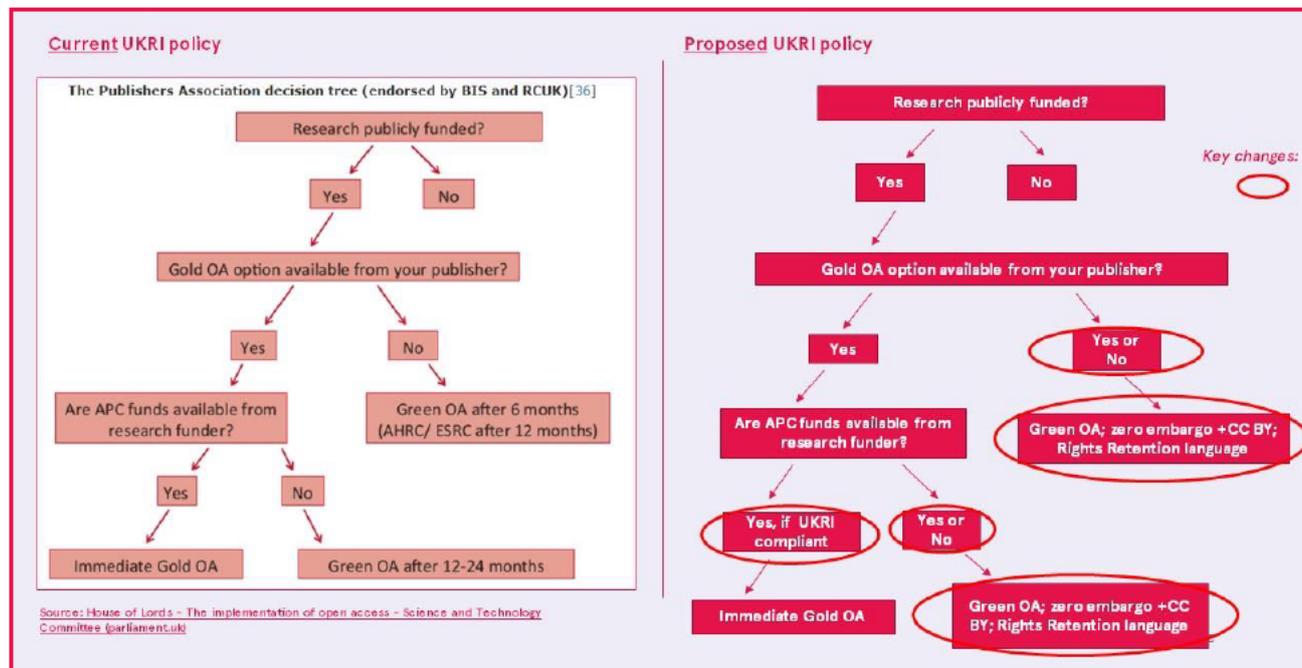
All engaged in these endeavours should be proud of the progress the UK has made as a world leader in open access. Nevertheless, we remain concerned that UKRI's policy, as it was consulted on, pre-dates much of the progress that has been made around transformative arrangements and, as such, introduces unintended risk into the equation. We urge UKRI to address these very real issues prior to implementation.

The solution is simple: Green OA should continue to remain a backstop only to be used for journals that do not offer a Gold route to compliance.

¹ Full details are available in the appendix.

Current and proposed UKRI policy:

When UKRI's current policy was published, the Publishers Association created the below decision tree. This was endorsed by BIS (now BEIS) and RCUK (now UKRI) and offers a useful framework against which to understand the proposed new policy.



Current UKRI policy is clear that UKRI-funded authors should first seek to publish via Gold OA.² Green OA is then a back-up option to only be used when Gold OA is not offered by the journal or cannot be funded.³ In such cases, Green OA is implemented with embargoes to ensure that this remains a sustainable option. The branches of the tree are independent and complementary paths.

UKRI's **proposed** policy presents four fundamental changes to existing policy.

1. Green OA becomes a blanket provision for all UKRI-funded researchers.
2. Green OA no longer has embargoes that enable publishers to recoup their substantial investment in peer review.
3. UKRI requires accepted manuscripts to have CC BY licences which means that they can be transformed by any other body into substitutes for the final published article.
4. New restrictions upon authors that will reduce their choice of publication venue, limiting the options currently available to them to receive UKRI funding to publish Gold OA.

Furthermore, these changes will be enforced by researchers being instructed to use Plan S "Rights Retention"⁴ language or similar in all articles arising from UKRI funded research.

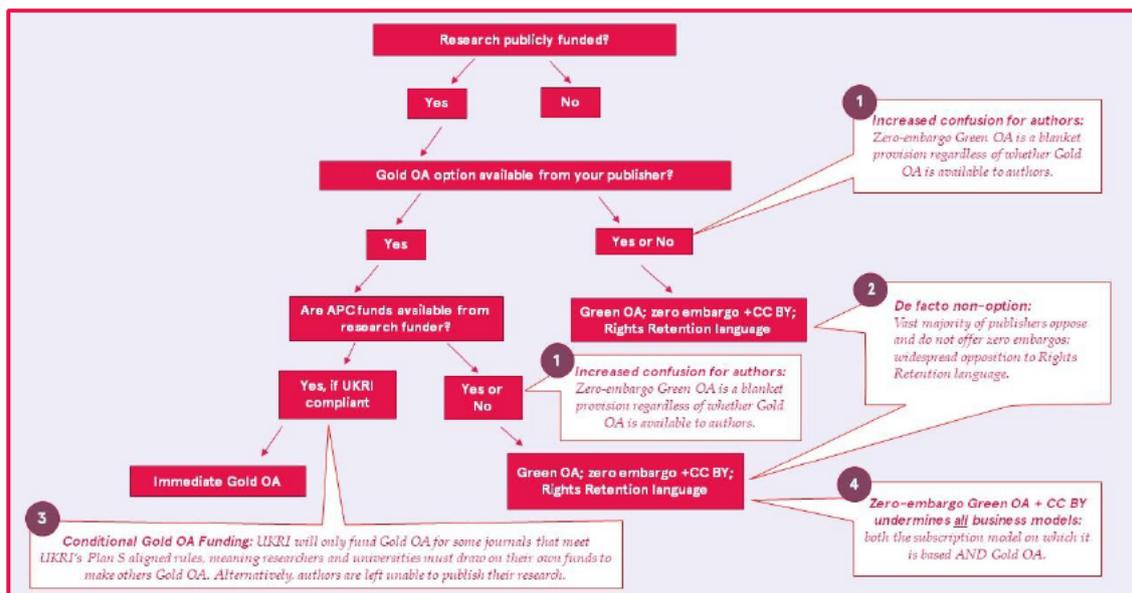
² Gold OA: makes the final version of articles freely and permanently available for everyone, immediately on publication, copyright is retained by the author, and articles are licensed to enable re-use and sharing. An article publication charge often applies. Gold OA articles can be published either in fully OA journals (where all the content is published OA) or hybrid journals (a subscription-based journal that offers an OA option which authors can choose if they wish).

³ Green OA: Accepted Manuscripts are archived in institutional or other repositories making them freely accessible for everyone. UKRI policy requires the Accepted Manuscript produced after the peer review process. Copyright often remains with the publisher. No charges are levied.

⁴ <https://www.coalition-s.org/rights-retention-strategy/>

Four key issues with UKRI's proposed policy:

The fundamental changes to UKRI's open access policy will in turn create four key issues. The impact of these will be felt immediately, and will be exacerbated over time.



- 1. Increased confusion for researchers:** The multiple routes to zero-embargo Green OA will confuse authors. Even where UKRI-compliant Gold OA is available, researchers will be informed that they can submit their articles with Rights Retention language asserting their ability to follow the Green OA route. UKRI is undermining the established practice that authors know and understand.
- 2. Significant restrictions on researcher choice and academic freedom:** Over 50 publishers - who collectively publish the majority of UK research - have already robustly and [publicly rejected](#) zero embargoes, especially with the Rights Retention language. Any requirement that the peer-reviewed version of an article is made immediately free through a repository undermines the economic viability of the whole system, including the management of peer review. The Green route to OA will thus become a *de facto* non-option for UKRI researchers, who therefore will *have* to publish Gold OA to comply with UKRI's policy.
- 3. Researchers left without funding to publish:** UKRI have not yet publicly shared their modelling of the costs of the proposals nor the funding streams that will be required to sustain the new policy. Because the policy is likely to align with Plan S requirements for funding open access, UKRI-funded authors will frequently not have access to UKRI funding to publish Gold OA – even though this will be the only viable mechanism for researchers to comply with UKRI's policy. The author or institution will thus have to pay for Gold OA themselves, or the researcher will have to publish in a different venue to their collaborators. This will lead to a two-tier situation that disadvantages those at smaller and less research-intensive universities.
- 4. OA progress will be undermined:** Zero-embargo Green OA with a CC BY licence offers a free, yet ultimately unsustainable alternative to paid Gold OA, and thus undermines the progress achieved through Gold OA and Transformative Agreements. Why would an author or institution pay to make an article Gold OA or support a Transformative Agreement when an immediately-posted manuscript with CC BY licence offers a free substitute for the final published article?

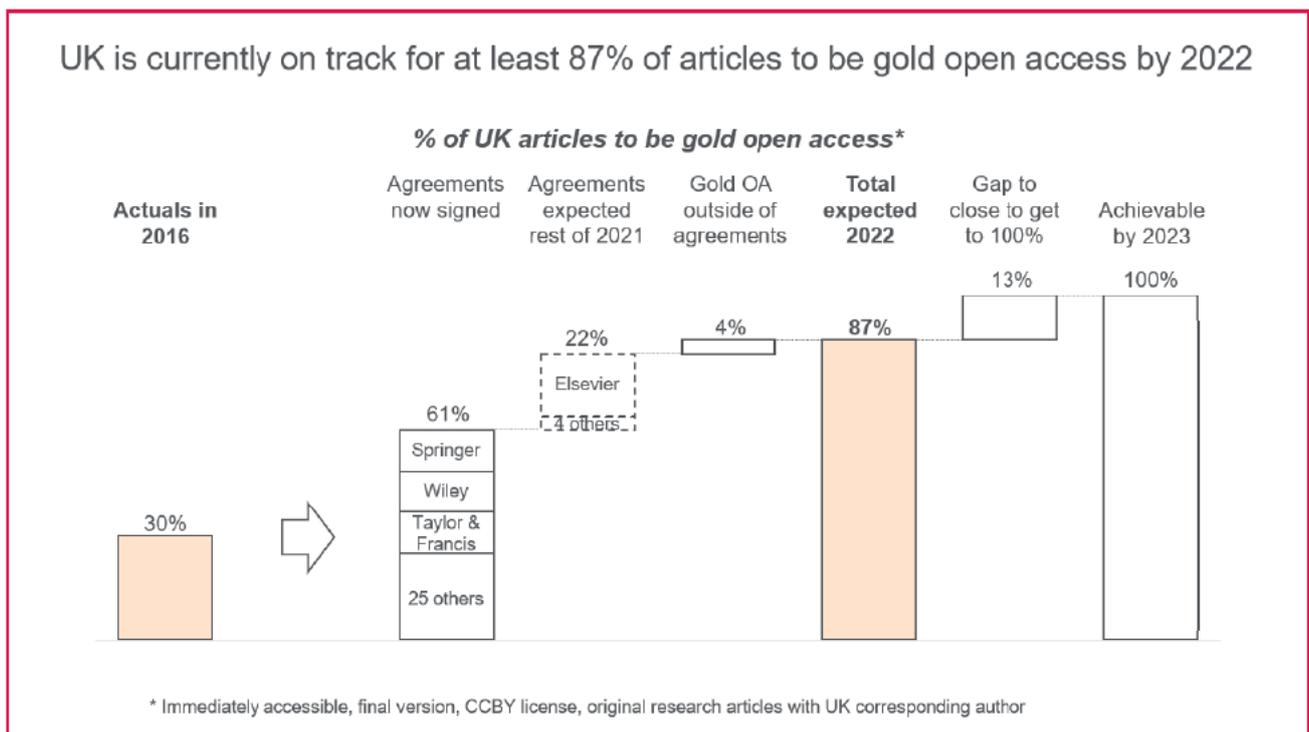
The solution:

UKRI is already on the brink of achieving its stated goals with the active support of publishers. As indicated in the Appendix below, the UK is on track to achieving close to 90% OA coverage in 2022. We urge UKRI not to unnecessarily derail this progress.

The blanket provision of zero-embargo Green OA (with a CC BY licence and Rights Retention language) component is the root cause of most of the risks outlined in this paper. These issues could be addressed with one simple change to the proposed policy: **that Green OA continue to remain a backstop only to be used for journals that do not offer a Gold route to compliance.**

Publishers remain hugely willing to work with UKRI and the university sector to deliver on the goal of 100% full and immediate open access to UKRI funded research. As the review draws to a close, we offer our engagement again – this time with a clear focus on eliminating the inevitable widespread confusion for UK researchers we foresee if the currently drafted policy is implemented as it is written.

Appendix 1:



Source: Scopus data.