Submission to the NSERC and SSHRC Consultation on the Draft Tri-Agency Open Access Policy

This document sets out the response from the Federation for the Humanities and Social Sciences (the Federation) to the Draft Tri-Agency Open Access Policy from the Natural Sciences and Engineering Research Council (NSERC) and the Social Sciences and Humanities Research Council (SSHRC).

I. Context
The rationale for open access to scholarly material is grounded in the belief that university-based research and scholarship represent a public good which freely draws on the work of others for its production and will in turn be freely used by others to build upon that knowledge. For work produced with public funds, there is a legitimate expectation that having underwritten the majority of the research costs, the public should freely access its results. This is critical for research in the social sciences and humanities, much of which is interesting to and understood by the broader public beyond academia. While it can be made available free of cost to the user, scholarly literature is by no means cost-free to publish; open access seeks to take advantage of reduced distribution costs associated with online publishing, while shifting the remaining costs away from the end user by using one or more alternative ways to finance the considerable costs of production.

Open access is rooted in scholars’ desire for the greatest readership and impact possible. Most academics have little expectation of making money from journal articles and only somewhat more from monographs (unlike from textbooks and popularizations). Instead, they weigh their remuneration in terms of citations, promotion and tenure decisions, profile and prestige. Open access maximizes the scholar’s potential readership and research impact since open access literature is, by definition, accessible to all.

Open access democratizes the diffusion of knowledge, particularly for researchers and students working in developing countries. By removing financial barriers associated with journal subscriptions, electronic information can fulfill the promise it holds to make knowledge more accessible throughout the world, helping to reduce the digital divide between rich and poor countries.

The Federation has previously indicated that it supports the principle of open access, signing the Berlin Declaration in September 2011. In March 2006, the Federation's General Assembly adopted the following principles:

1. Open access must be promoted, incremental and flexible, not mandated;
2. The scholarly contribution of open access and self-archived research must be better measured and recognized;
3. The Federation will undertake education and resource development to assist scholars and associations in adopting best practices for open access;
4. The financial viability of associations and journals must be assured in the transition toward open access;
5. The Federation will encourage publishers to adopt policies that support self-archiving;
6. Digitization is necessary for greater access to scholarship;
7. The Federation supports the development of international standards for metadata.
II. Recommendations
The Draft Tri-Agency Open Access Policy would require grant recipients to ensure that any peer-reviewed journal publications arising from Tri-Agency-supported research are freely accessible within 12 months of publication, either through the publisher’s website or an online repository.

The Federation welcomes the draft policy bearing in mind the principles that the Tri-Agencies put forward as having guided them in promoting open access to research publications, namely:

- Committing to academic freedom, and the right to publish;
- Maintaining the high standards and quality of research by committing to academic openness, integrity and ethics;
- Promoting recognized research best practices and standards across disciplines, and embracing and sharing emerging practices and standards;
- Advancing academic research, science and innovation;
- Effective diffusion of research results; and
- Aligning activities, programs and policies between Canadian and international research funding agencies.

The Federation recommends that the Tri-Agencies strengthen their policy by integrating the following measures:

- That the Tri-Agencies require deposit of peer-reviewed journal publications, upon acceptance, in an institutional repository or open-access repository with full metadata (having proper metadata will ensure accessibility and visibility);
- That curriculum vitae formats for grant applications and requirements for grant-end reports be modified to require researchers to report on the repository location of deposited publications and/or the open access status of journal publications;
- That long term preservation and persistence of content be a priority at a time when research output is increasingly only available in a digital format;
- That the potential costs to authors of publishing in open access formats are recognized as eligible expenses under the use of grant funds.

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The Federation for the Humanities and Social Sciences works to promote the value of research and learning in the humanities and social sciences. Created in 1996, its membership comprises over 80 scholarly associations, 79 institutions and six affiliate organizations, representing 85,000 researchers, educators and students across Canada.

Relevant to this consultation, the Federation has recently launched a multi-year project to develop an open access policy for the Federation-administered, SSHRC-funded Awards to Scholarly Publications Program (ASPP). This project will include an international scan of open access policies for monographs and an extensive consultation period. The final open access policy for the ASPP will be implemented in April 2015.

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