

29th May 2020

Elsevier response to UKRI OA Policy Review consultation

Section A: Research Journals

Q1. To what extent do you agree or disagree that it is clear what research articles are in-scope of UKRI's proposed OA policy (see paragraph 46 of the consultation document)?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

No opinion.

If anything is unclear, please explain why (1,350 characters maximum, approximately 200 words).

It is clear what research articles are in-scope of UKRI's proposed OA policy. UKRI's policy could consider the range of research outputs beyond peer-reviewed articles, to enhance scientific rigour and comprehensive access to research.

Given the format of this policy consultation, here we comment on our overall approach to our response, particularly Section A:

- *We identify below key principles pertaining to "research articles".*
- *In Question 4 we give an executive summary of key points.*
- *Thereafter we detail these points in response to relevant questions.*
- *We do not respond to questions that are not fundamental to our key points.*

Key principles regarding research articles include:

- *They incorporate value-added features of the peer-review-publishing system*
- *These features result from publishers' investments.*
- *Publishers must be able to recoup their investments via sustainable business models to continue publishing research articles*

Two business models are proven at scale: (a) "Pay-to-Read" – in which readers license access to articles (representing around 80% of articles globally); and (b) "Pay-to-Publish" – in which the author, their funder or institution pays an Article Publication Charge (APC) to make the article free to all readers (representing around 20% of articles globally).

Q2. Are there any additional considerations that the UK HE funding bodies should take into account when defining research articles that will be in-scope of the OA policy for the REF-after-REF 2021?

Yes

No

Don't know

No opinion.

If yes, please expand (1,350 characters maximum, approximately 200 words).

While we will do our utmost to support REF-after-REF-2021 processes, since we are not directly affected by its outcomes (compared to researchers or universities) we opt here not to elaborate on responses to questions related to its design. Broadly, we recommend a consistent approach towards both UKRI and the REF-after-REF policies to avoid confusion and challenges for researchers when working to ensure compliance.

Q3. In setting its policy, should UKRI consider any other venues for peer-reviewed research articles which are not stated in paragraph 47 of the consultation document?

Yes

No

Don't know

No opinion.

If yes, please expand (700 characters maximum, approximately 100 words).

No, we consider the venues specified (journals; OA platforms; institutional and subject repositories) to be sufficient.

Q4. Are there any specific challenges for you, your community or your organisation in terms of complying with the requirement in UKRI's proposed policy for immediate OA of in-scope research articles?

Yes

No

Don't know

No opinion.

Please explain and, where possible, evidence your answer. UKRI notes that there will be a period allowing for implementation before the policy comes into force (see paragraph 70 of the consultation document). (2,650 characters maximum, approximately 400 words.)

UKRI's proposal poses significant challenges for the industry and broader research community. These can be overcome if all stakeholders collaborate to address them. Here we set out our fundamental points concerning UKRI's proposals, noting where we provide additional detail.

- 1. Elsevier supports UKRI's objectives to make articles authored by UKRI-funded researchers immediately and freely available to the world. We note that UK researchers will need to continue accessing research articles published by non-UK researchers (around 93% of the world's total, of which around 80% are not currently OA).**

- 2. To publish research articles, publishers must be able to recoup their investments via sustainable business models – i.e. Pay-to-Read or Pay-to-Publish. UKRI's policy should support the UK's global leadership position in the Publishing and Research sectors. [See Question 1]**

- 3. The most effective mechanism to meet UKRI's objectives for published articles authored by UKRI-funded researchers is the Pay-to-Publish (Gold OA) model; in conjunction with Pay-to-Read for non-UK articles that are not yet OA.**

- 4. To achieve this there are key challenges that must be addressed:**
 - a. There will be funding implications, particularly for research intensive institutions, to implement UKRI's proposals. We do not believe that existing funds for publishing in the UK research system would be sufficient to pay to publish all the UK's research OA and pay to read the rest of the world's non-OA research. [See Question 21]**
 - b. Researchers will need to comply fully, which elsewhere has not happened even where OA policies exist and payments for APCs are provided on behalf of researchers. [See Question 17]**

- 5. There are ways to overcome these challenges:**
 - a. We are keen to contribute, alongside all stakeholders, to find solutions. In light of the above challenges, and the broader fiscal challenges faced by the UK currently, a viable Green OA approach should be maintained, ensuring that opportunities to advance OA are not lost due to fiscal pressures. Under Green OA, embargos cannot be removed altogether, as this will significantly harm the Pay-to-Read model supporting Green OA, and constitutes a de facto price cap. [See Questions 20/ 28]**
 - b. Researcher compliance can be significantly increased by enabling authors to Pay-to-Publish in hybrid journals, because it will support their publication options. [See Question 24]**

- 6. Elsevier is committed to collaborating pragmatically and in good faith with all stakeholders to address challenges in support of UKRI's objectives. [See Questions 19/ 28]**

Q5. Should UKRI's OA policy require a version of all in-scope research articles to be deposited in a repository, irrespective of whether the version of record is made OA via a journal or publishing platform?

Yes

No

Don't know

No opinion.

Please explain your answer (700 characters maximum, approximately **100 words**). Please note that some Research Councils already require articles to be deposited in specific repositories, as detailed in the terms and conditions of funding. UKRI does not expect this to change.

UKRI's objectives of immediate access to research can be met under the Pay-to-Publish, or Gold OA model, which also enables the final article, Version of Record (VoR), to be deposited into repositories. Equally, Accepted Manuscript versions of research articles can also be deposited into repositories following an embargo period under the Green OA route. Additionally, since repositories have significant fixed and operational costs there should be a clear understanding of the benefits and whether these justify the costs before requiring a version of all in-scope research articles to be deposited in a repository.

Q6. For research articles, are there any additional considerations relating to OA routes, publication venues and embargo periods that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021?

Yes

No

Don't know

No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

We respectfully suggest that researchers ought to be able to comply for purposes of the REF-after-REF 2021 if they either (a) publish under the Pay-to-Publish (i.e. Gold OA) model in a pure gold or hybrid journal; or (b) make the Accepted Manuscript available after the appropriate embargo period (depending on discipline). Including mechanism (b) would enable researchers to have a broader range of options, while challenges related to funding flows associated with Paying-to-Publish UK articles Open Access (in addition to Paying-to-Read non-OA non-UK articles) are addressed.

Q7. To what extent do you agree or disagree that where compliance with UKRI's OA policy is achieved via a repository, a CC BY licence (or Open Government Licence where needed) should be required for the deposited copy?

Strongly agree

Agree

Neither Agree nor disagree

Disagree

Strongly disagree

Don't Know

No opinion.

Please explain your answer (1,350 characters maximum, approximately 200 words)

We support and implement a policy under which Versions of Record (VoR) of research articles are made immediately available under a CC BY license through the Pay-to-Publish model.

Where Pay-to-Publish funding is not provided, we rely on subscriptions (the Pay-to-Read model) to publish articles. However, a CC BY license in conjunction with the immediate deposit of Accepted Manuscripts (AMs) into repositories would fundamentally undermine the subscription business model. An immediately available AM with full reuse rights via CC BY constitutes a free substitute that would eliminate the need to have the Pay-to-Read published article. If journals publishing Pay-to-Read articles collapse as a result, then so too will the publishing model that generates AMs in the first place (Journal studies: The Annals of Mathematics; Journal of Clinical Investigation; Genetics). Unfunded immediate deposit of AMs (in the absence of a Pay-to-Publish model) is a self-destructing proposition: the quality and level of UK research outputs, and therefore the leading status of the UK publishing industry, will inevitably suffer in this scenario.

In further answers on licensing and copyright, we highlight a flexible environment that preserves author choice and enables reuse rights, balanced with publishers' ability to safeguard and disseminate content.

Q8. To what extent do you agree or disagree that UKRI's OA policy should have a case-by-case exception allowing CC BY-ND for the version of record and/or author's accepted manuscript.

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

No opinion.

Please explain your answer. UKRI particularly welcomes evidence supporting: specific cases where ND is considered necessary; an ND exception not being necessary; any implications an ND exception could have for access and reuse (2,000 characters maximum, approximately **300 words**).

We support all options that enable authors to determine the use and reuse of their works. Authors need to have broad choices because their publication records affect their careers. Enabling authors to use a license of their choosing is consistent with this principle. In this case, we believe an exception for all alternative reuse licenses would be the most pragmatic implementation of UKRI's policy.

To note, while Elsevier offers CC BY licenses, we frequently find that authors prefer alternative licenses, e.g. to avoid the possibility of distortions, misinterpretation or undue exploitation of their works. Various studies¹ support this view. In this regard, Creative Commons licenses such as CC BY NC ND, for instance, serve to protect the integrity and quality of research outputs; provide ways of ensuring that publisher investments in publications can be recouped; and still enable that research to be easily made available and developed upon.

Q9. Would the proposed licensing requirements for UKRI's OA policy, which exclude third-party content (see paragraph 55 of the consultation document), affect your or your organisation's ability to publish in-scope research articles containing third-party content?

Yes

No

Don't know

No opinion.

If yes, please explain how (1,350 characters maximum, approximately 200 words).

UKRI's proposals with respect to third-party content could cause confusion and pose unnecessary obstructions to publishing works. Permissions for third party material will in many cases be granted on more restrictive terms than the CC BY license. Attempting to apply the CC BY licenses to works that include such third-party content may create the risk of copyright infringement and limit the ability to share the entirety of the article. For researchers publishing through a commercial publisher like Elsevier, copyright exceptions for non-commercial use cannot be relied upon. Moreover, UKRI's rationale that researchers should be able to understand and rely on a non-commercial research copyright exception is not consistent with its proposals elsewhere, which specifically prohibit the use of the CC BY NC license because of possible author uncertainty as to definitions around 'commercial' and 'non-commercial' uses.

Q10. Are there other considerations UKRI should take into account regarding licensing requirements for research articles in-scope of its proposed OA policy?

Yes

¹ <https://www.tandf.co.uk//journals/explore/open-access-survey-june2014.pdf>
<https://onlinelibrary.wiley.com/doi/abs/10.1002/asi.23710>
<https://www.nature.com/news/biologists-debate-how-to-license-preprints-1.22161>

No

Don't know

No opinion.

If yes, please expand (1,350 characters maximum, approximately 200 words).

We have addressed our key points on licensing in our above answers.

Q12. Which statement best reflects your views on whether UKRI's OA policy should require copyright and/or rights retention for in-scope research articles?

- a. UKRI should require an author or their institution to retain copyright and not exclusively transfer this to a publisher
- b. UKRI should require an author or their institution to retain specific reuse rights, including rights to deposit the author's accepted manuscript in a repository in line with the deposit and licensing requirements of UKRI's OA policy
- c. UKRI should require an author or their institution to retain copyright AND specific reuse rights, including rights to deposit the author's accepted manuscript in a repository in line with the deposit and licensing requirements of UKRI's OA policy
- d. UKRI should not have a requirement for copyright or rights retention**
- e. Don't know
- f. No opinion

Please explain your answer. UKRI particularly welcomes views as to whether it is necessary to require copyright and/or rights retention if its policy were to require a CC BY licence, which enables reuse. If you selected answer b or c, please state what reuse rights you think UKRI's OA policy should require to be retained (2,000 characters maximum, approximately **300** words). Please note that views are not sought on whether institutions should hold the copyright to work produced by their employees as this is subject to Section 11 of the Copyright, Designs and Patents Act 1988 and institutional copyright policies.

We support and implement policies under a Pay-to-Publish, or 'Gold' OA model, which enables researchers to retain copyright over their works and to utilise the CC BY license. Again, this attests to the fact that UKRI's policy proposals are best matched with a fully funded Gold OA model for UK outputs, as standard practices are then already in place to enable copyright retention and author choices in this regard.

Conversely, as outlined above, Green OA (manuscript-posting to a repository after an embargo) relies on the (Pay-to-Read) subscription model to continue to operate. Above, we have highlighted our strong concerns with UKRI's proposal to remove embargo periods (Evidence for this includes journal test studies referenced in Q7, plus

<https://www.msri.org/attachments/workshops/587/MSRIfinalreport.pdf>;

<https://scholarlykitchen.sspnet.org/2009/02/26/end-of-free-access/>). We have also advocated that authors have flexibility to select license terms under the Green OA model. A key additional factor is the need for publishers to utilise copyright in (Pay-to-Read) subscription articles in order to sustainably publish, disseminate and safeguard researchers' content. This is balanced with

researchers' broad rights to use and share their articles under our sharing policies. The transfer of copyright combined with flexible licensing and these author rights ensure that researchers can reuse and share their works and that we can protect works from, for instance, plagiarism or infringement, while having the ability to recoup investments. Requirements by UKRI for rights retention under the Pay-to-Read model would substantially undermine publishers' incentives to invest in publishing research articles, which supports the features and services valued by researchers.

Q13. Regarding research articles in-scope of UKRI's OA policy, to what extent do you agree or disagree with each of the seven proposed technical standard requirements for journals and OA publishing platforms? For each of the seven standards (see paragraphs 67a-67g of the consultation document):

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

No opinion.

For each of the seven standards (see paragraphs 67a-67g of the consultation document), please explain your answer (700 characters maximum, approximately 100 words, per standard).

Elsevier implements a range of these technical requirements, as part of our commitments to measures which ensure transparency and rigour in line with broad sector standards. We support the publisher community's work on industry standard initiatives. For example, we are one of the first endorsers of ORCID, which provides standardized persistent identifiers to individual researchers through integration with our data and systems. Nevertheless, all these technical requirements do not scale to all types of publishers. Several contradict standard practices or undermine publishers' incentives to invest in content. Compliance with all these standards will therefore not be to the benefit of science.

- a. Persistent digital object identifiers (PIDs) for research outputs must be implemented according to international standards such as DOI URN or Handle
- b. article-level metadata must be used according to a defined application profile that supports UKRI's proposed OA policy and is available via a CC0 public domain dedication; the metadata standard must adhere to international best practice such as the Crossref schema and OpenAIRE guidelines
- c. machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format

- d. long-term preservation must be supported via a robust preservation programme such as CLOCKSS, Portico or an equivalent
- e. openly accessible data on citations must be made available according to the standards set out by the Initiative for Open Citations (I4OC)
- f. self-archiving policies must be registered in the SHERPA RoMEO database that underpins SHERPA/FACT
- g. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors

Q14. Regarding research articles in-scope of UKRI's OA policy, to what extent do you agree or disagree with each of the five proposed technical standard requirements for institutional and subject repositories? For each of the five standards (see paragraphs 68a-68e of the consultation document):

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

No opinion.

For each of the five standards (see paragraphs 68a-68e of the consultation document), please explain your answer (700 characters maximum, approximately 100 words, per standard).

- a. PIDs for research outputs must be implemented according to international standards such as DOI, URN or Handle
- b. article-level metadata must be implemented according to a defined application profile that supports the proposed UKRI OA policy and is available via a CC0 public domain dedication; this should include the persistent identifier to both the author's accepted manuscript and the version of record; the metadata standard must adhere to international best practice such as the OpenAIRE guidelines
- c. machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format
- d. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors
- e. the repository must be registered in the Directory of Open Access Repositories (OpenDOAR)

Q15. To support the adoption of technical standards for OA, are there other standards, actions and/or issues UKRI should consider?

Yes

No

Don't know

No opinion.

Please explain your answer (2,650 characters maximum, approximately 400 words).

Q16. To support the implementation of UKRI's proposed OA policy requirement for research articles to include an access statement for underlying research materials (see paragraph 69 of the consultation document), are there any technical standards or best practices that UKRI should consider requiring?

Yes

No

Don't know

No opinion.

Please explain your answer (1,350 characters maximum, approximately 200 words).

We agree with proposals that will support sharing of underlying research materials. Best practices could include:

- *Data should be posted in a repository that is CoreTrustSeal certified or meets as many CoreTrustSeal requirements as possible.*
 - o <https://www.coretrustseal.org/about/>
 - o <https://www.coretrustseal.org/why-certification/requirements/>
- *Data should be cited following the FORCE11 data citation standards.*
 - o <https://www.force11.org/datacitationprinciples>

Q17. UKRI's OA policy is proposed to apply to in-scope research articles accepted for publication on or after 1 January 2022. Which statement best reflects your views on this?

a. The policy should apply from 1 January 2022

b. The policy should apply earlier than 1 January 2022

c. The policy should apply later than 1 January 2022

d. Don't know

e. No opinion

Please explain your answer. UKRI particularly welcomes detailed evidence as to the practical implications of the choice of date. If you selected b or c, please also state what you consider to be a feasible implementation date (2,000 characters maximum, approximately **300** words).

Elsevier will fully support UKRI's chosen timeline to implement its policy on research articles. As stated above, UKRI's objectives of free and immediate access to UK outputs can be achieved via the Pay-to-Publish model. However, there will be funding implications to make 100% of UK research outputs freely and immediately available, while UK institutions also pay to read the 93% of non-UK research articles, of which around 80% are not yet OA.

While these challenges can be addressed by adjusting funding flows, experience from other countries (e.g. Germany) indicates that even when national Publish-and-Read agreements are in place with publishers, to shift funding flows is highly complex and takes several years. It is unclear whether UKRI will need to adjust its timelines to address this complexity and take the necessary steps to adjust funding flows in support of its policy.

As a side note, while it may not affect policy implementation timelines, it is pertinent to note that compliance by researchers with UKRI's policy will impact actual policy uptake and impact. Even in national agreements where OA policies exist and payments for APCs are provided on behalf of researchers, researcher compliance is not close to 100%.

Q18. For research articles, are there any considerations that UKRI and UK HE funding bodies need to take into account regarding the interplay between the implementation dates for UKRI's OA policy and the OA policy for the REF-after REF 2021?

Yes

No

Don't know

No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

We suggest consistency and alignment between the two policies to avoid a confusing and cumbersome implementation for researchers and stakeholders.

Q19. Do you think the proposals outlined in Section A will have any financial cost implications for you or your organisation?

Yes

No

Don't Know

No opinion.

Please expand, providing evidence to support your view, where possible (2,000 characters maximum, approximately 300 words).

To be clear, as requested, here we discuss cost, not revenue, implications.

Implementing UKRI's policy via a combination of Pay-to-Publish for UK-authored articles and Pay-to-Read non-UK authored articles, which are not OA, will have operational cost implications. For example, costs will be incurred via additional staff time and systems workflow process redesigns required to negotiate, agree, and implement relatively complex Publish-and-Read agreements across a broad range of stakeholders, i.e. Elsevier, funders, institutions and researchers. However, these operational cost implications are ones that we are very willing to undertake as part of our ongoing costs of addressing the sector's objectives as we collaborate in good faith - consistent with our approach in other countries.

Q20. Do you think the proposals outlined in Section A of the consultation document will result in financial benefits for you or your organisation?

Yes

No

Don't Know

No opinion.

Please expand, providing evidence to support your view, where possible (2,000 characters maximum, approximately 300 words).

UKRI's proposals imply Paying-to-Publish 7% of the world's articles that are UK-authored, while also Paying-to-Read almost 93% of non-UK articles (those that are not OA). Enabling such a proposition would not deliver financial benefits to Elsevier, though the mix of revenues from UK vs non-UK countries would likely change. If the UK paid to publish its output OA, non-UK countries would no longer have to Pay-to-Read those UK articles. As such, the UK would effectively be fully subsidizing the cost of global access to its articles so that other countries no longer pay subscriptions to access them. However, if non-UK countries didn't make their output OA in return, the UK would continue paying to read them. As a result (notwithstanding savings made by the UK on national subscription costs), the UK would pay proportionally more of the global system's costs, while the rest of the world would pay proportionally less. Again, publishers don't benefit from this arrangement. The effect would lessen if other countries also made their output OA. However, even in an entirely Pay-to-Publish world, the UK would almost certainly pay proportionally more than it does today, because its share of articles (7%) is higher than its share of payments to journal publishers (3%).

What would have significant negative financial impact for any publisher are mandates for UK outputs to be freely and openly accessible through manuscript posting without embargos, and without any Pay-to-Publish arrangement. To do so would undermine the Pay-to-Read model by making free substitutes available that compete with the paid-for version. This would harm an industry and the quality of UK science,² given the impacts to published articles with all the features valued by researchers. For this reason, we strongly oppose the suggestion of manuscript-posting without embargos.

Q21. Can you provide any evidence of a changing balance of costs across research organisations arising from an emphasis on publishing costs rather than read costs?

² <https://scholarlykitchen.sspnet.org/2009/02/26/end-of-free-access/> ;
<https://www.msri.org/attachments/workshops/587/MSRIfinalreport.pdf>

Yes

No

Don't know

No opinion.

Please expand (2,000 characters maximum, approximately 300 words).

If research-intensive institutions are required to fund Article Publishing Charges (APCs) of the articles that their researchers produce, they will disproportionately pay more to fund the publication of their outputs, compared to those institutions that have no published output and so would pay no APCs.

The most prolific UK universities today publish around 10,000 articles annually. At an APC of £2,000 (using APC levels from the 2017 [UUK report](#)), annual Pay-to-Publish fees for individual institutions would be around £20 million, several times more than they pay today in Pay-to-Read fees.

The same challenges are illustrated by research-intensive universities in Germany, the so-called [U-15 statement](#). The Bibsam Consortium in Sweden also conducted a 2019 [study](#) on internal costs reallocation. Its findings state that 'calculations of distribution model changes show a significant financial impact on individual consortium participants. To solve this financial impact one must also look beyond distribution model changes with the help of national research funders and government.'

Finally, the Pay It Forward study funded by the Mellon Foundation and conducted on behalf of the University of California Libraries also found added costs and open questions around financing models, noting: "[F]or larger research-intensive institutions," a flip to a single pay-to-publish model will cause a "significant funding gap" as "the total cost to publish...will exceed current library journal budgets."

This also speaks to the challenges of adjusting library budgets to new models: funding flows mapping to how institutions read (i.e. their licence payments to access journals), are very different to institutions funding more to publish (i.e. their APCs to make articles authored by their researchers Gold OA). Institutions will therefore need to commit efforts, resources and costs towards adjusting their budgets and processes accordingly.

(No room in wordcount for references but happy to provide.)

Q22. Can you provide any evidence on cost increases and/or price rises (including in relation to OA article processing charges (APCs) and subscriptions) and reasons for these?

Yes

No

Don't know

No opinion.

Please expand (2,000 characters maximum, approximately 300 words).

With respect to the Pay-to-Read model, journal subscription list price adjustments are determined by a range of factors, including the volume of all articles published on a Pay-to-Read basis, which has historically grown in line with R&D spending. (Elsevier's Pay-to-Read article volumes have grown at c.4% annually). UK universities, however, typically pay fees for collections of journals that have increased at rates well below journal subscription list prices, such that the price per accessible article continues to fall. For example, our prices per subscription article agreed with JISC have consistently

fallen: price increases are below list price increases as well as volume growth, while journal quality consistently rises.

With respect to the Pay-to-Publish (Gold OA) model, APCs will develop as publishers continue to experiment with OA models and price points, since this model is still maturing. Publishers are increasingly differentiating APCs: journals with high rejection rates, high-touch editorial processes and significant marketing and communications functions have above average costs, while the converse have lower costs. Additionally, new Gold OA publishers are increasing APCs as they seek to become financially [viable](#).

Putting the two together, the research sector globally is Paying-to-Publish around 20% of articles, while also Paying-to-Read around 80% of articles. Many publishers now have income streams from both models, but this absolutely does not amount to double-dipping: APCs fund the publication of Gold OA articles; journal subscriptions fund the publication of Pay-to-Read articles. We acknowledge the challenges for nations and institutions to keep paying to read articles while also paying to publish their own output OA. We are willing to work constructively to share the burden of such a transition; however, no stakeholder – publishers, funders, nor institutions – can be expected to shoulder the structural challenge of shifting funding flows alone.

Q23. Do you think there are steps publishers and/or other stakeholders could take to improve the transparency of publication charges?

Yes

No

Don't know

No opinion.

Please expand. Views are also welcome on how greater transparency might inform future funding levels (2,000 characters maximum, approximately 300 words)

Elsevier fully supports making transparent the services that our journals provide relative to their APCs so that payers of APCs are clear about the publishing services that they are getting in return.

Elsevier already aims to be transparent about our journal APC and subscription pricing, metrics for quality and services we provide. Examples include:

- *The APC prices for all Elsevier journals provided in our APC price [list](#)*
- *[Journal Finder](#) provides service standards for individual journals, including impact metrics and timelines from acceptance to publication, as well as the APC*
- *Journal home pages and other [web pages](#) provide information on services and publishing processes*
- *We consolidate information on our [Pricing Policy](#) page, as well as articulate criteria behind how our prices are set.*

We acknowledge that we can go further, and we commit to better articulating rationales behind our pricing within the confines of legislation and accepted practices. We welcome and will actively participate in efforts to communicate service levels consistently, enabling purchasers of APCs to assess the value delivered by our journals. This, for example, could include work on cross-industry benchmarks or standardisation to provide a clear method of comparing publisher offers in a meaningful way.

Q24. Regarding UKRI's consideration about restricting the use of its OA funds for publication in hybrid journals (see paragraph 80 of the consultation document), please select the statement that best reflects your views:

- a. UKRI OA funds should not be permitted to support OA publication in hybrid journals
- b. UKRI OA funds should only be permitted to support OA publication in hybrid journals where they are party to a transformative agreement or similar arrangement
- c. UKRI OA funds should be permitted to support OA publication in hybrid journals**
- d. None of the above
- e. Don't know
- f. No opinion

Please explain and, where possible, evidence your answer (2,650 characters maximum, approximately 400 words).

Hybrid journals ("hybrids") have a key and constructive role to play in [enabling OA](#), as per the 2017 UUK report, while contributing to the quality of scientific output in the UK, thereby meeting UKRI's objectives. As referenced in our executive summary, hybrids provide options for researchers to have clear choices in their preferred publication, while enabling them to more easily choose to publish OA. Data from Scopus shows that there are 8,400 hybrid journals. If made ineligible for UKRI funding, this would amount to an 88% drop in funded OA venues for researchers. Excluding hybrids from funding will ultimately remove OA options for researchers, and will not, therefore, accelerate OA adoption as per UKRI's policy objectives. Hybrids also offer quality publication options to researchers. Excluding them so that researchers are forced to publish in Pure Gold OA journals, many of which are nascent, could negatively affect the visibility and citation performance of UK research. In turn, this could impact the UK's strong performance in university rankings, which influences choices of student and faculty that the UK is seeking to attract.

Hybrids have been criticised as preserving the 'status quo' of the Pay-to-Read model. We reject this criticism: if hybrids have not become fully OA, it is due to lack of demand, not an issue with supply. If all researchers opted to publish on a Gold OA basis, then hybrids would be fully OA. In the interim, articles made Gold OA in hybrid titles are no less Open Access than ones in Pure Gold OA titles. Hybrids will transition to full OA should enough researchers choose to publish OA within these journals.

Hybrids have also been criticised for double-dipping. We reject this too. Hybrid journals do have income streams from both Pay-to-Publish and Pay-to-Read models, but this absolutely does not amount to double-dipping: APCs fund the publication of Gold OA articles; subscriptions fund the publication of remaining Pay-to-Read articles. The reason subscription fees for hybrid titles have generally not yet fallen is because despite a proportional increase in OA uptake, a still-growing number of articles are published on a Pay-to-Read basis.

Finally, we disagree that withdrawing funding for hybrid APCs will lead to cost-efficiencies that would serve UKRI's policy objectives. Withdrawing funding will reduce choice, quality and growth in OA research outputs.

Q25. To what extent do you agree or disagree that UKRI OA funds should be permitted to support OA costs that support institutional repositories?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

No opinion.

Please explain and, where possible, evidence your view (2,650 characters maximum, approximately 400 words).

Q26. To help accelerate policy adoption, should UKRI introduce any other restrictions on how UKRI OA funds can be used?

Yes

No

Don't know

No opinion.

Please explain your answer, including any views on how this could be implemented (1,350 characters maximum, approximately 200 words).

Q27. There are many business models that can support OA. A common model for journals is based on APCs, but there are also other models (such as membership models and subscribe to open). Are there changes or alternatives to the present UKRI funding mechanisms that might help support a diversity of OA models?

Yes

No

Don't know

No opinion.

Please expand (2,650 characters maximum, approximately 400 words).

While the overriding focus in our consultation response has been on the Pay-to-Publish model to meet UKRI's objectives of immediate access to the VoR, we support any model that would reach this goal in a sustainable and pragmatic manner. We welcome testing and learning new models to

understand their efficacy in achieving immediate access to content. For instance, we have previously trialled submission fees and we are currently piloting the use of an Editorial Processing Charge, or [EPC](#), to this end. We publish and partner on subsidised journals in our portfolio and, for instance, through Digital Commons, we have worked with institutions to help them publish their own journals.

In a similar vein, we have implemented over ten pilots with consortia to fund Pay-to-Publish models in conjunction with Pay-to-Read models. Thinking is still evolving as to the application of OA models to different tiers of journals, which require higher price points to reflect the level of services and investment allocated to these journals.

UKRI's support for a diversity of models attests to the fact that OA models are still evolving in the research ecosystem. A range of models have developed in recent years. [Research](#) commissioned by UKRI identified 27 different models to transition to OA. Flexibility in OA policies is therefore key to ensure freedom to test and evaluate these models, at different price and access points across the broadest possible range of venues.

Q28. As discussed in paragraph 74 of the consultation document, transformative agreements are one way of moving to OA in a more cost-effective way. Are there approaches to managing transformative agreements or other mechanisms and developments that UKRI should consider to help manage the transition to OA in a way that is cost-effective and offers public value to the UK?

Yes

No

Don't know

No opinion.

Please expand (2,650 characters maximum, approximately 400 words).

In countries with similar ambitions to make their output immediately and openly available, we have worked together with funders and institutions to reach mutually beneficial arrangements. We have implemented over ten pilots with consortia to fund Pay-to-Publish models in conjunction with Pay-to-Read models.

As the consultation notes, nevertheless, Transformative Agreements are nascent in their implementation. For Elsevier, we focus on delivering bespoke agreements to countries with varying needs. We would therefore caution against attempts to impose uniform approaches or mechanisms to agreements in such early stages. Moreover, these agreements take considerable time and resources, and are therefore not easily scalable for all stakeholders.

We would also caution against cost-effectiveness becoming an end goal in Transformative Agreements, to the detriment of shared objectives of increasing OA uptake. As noted in our above responses, there will be increased costs when making 100% of UK research outputs OA. These can be managed (see below), but the financial burdens must be shared. An overriding focus on achieving cost-efficiencies therefore conflicts with the ambition to transition all UK outputs to OA, while UK researchers still need to access the vast volume of articles (around 2 million each year) from the rest of the world that are not OA.

We contribute to sustainable OA transitions in the following ways:

- *Sharing learnings from our international agreements.*

- *Sharing and underwriting a reasonable portion of costs in a transitional period through Transformative Agreements.*
- *Investing in piloting customised agreements, e.g. systems savings to institutional repositories; improving efficiencies for researchers.*
- *We shoulder costs relating to operations, reporting and workflow solutions in our OA agreements.*

For UKRI to achieve its policy goals as cost-effectively as possible, we suggest:

Funding implications should be thoroughly assessed by UKRI. We welcome submitting data to UKRI's economic assessment.

- *A pragmatic focus on achieving UKRI's goals of immediate access to the VOR, using established models. A Pay-to-Publish model for immediate access will be the most effective mechanism.*
- *Should there not be a viable singular Pay-to-Publish route, UKRI's policy could also utilise a sustainable Pay-to-Read or 'Green' OA model, in a transitional period, including appropriate (i.e. 12-24 month) embargos and licensing options.*
- *Consideration could be given to pacing the timeline to achieve a transition in a measured way, alleviating the funding pressures noted above.*

Q29. Are there any existing or new infrastructure services that you think UKRI should fund the maintenance and/or development of, to support the implementation of its OA policy for research articles?

Yes

No

Don't know

No opinion.

If yes, please state what these are and explain and, where possible, evidence why UKRI should provide support (2,650 characters maximum, approximately 400 words).

Infrastructure to support insights and take-up of OA will be crucial to monitor the success of UKRI's policy implementation. We are happy to provide UKRI with insights as to the kinds of technology and operations we implement that support take-up of OA. This could cover analytics to better understand OA uptake, or information on services we provide to aid discoverability and author matches to relevant OA journals.

Q30. To what extent do you agree or disagree that UKRI should provide or support a national shared repository?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

No opinion.

Please explain and, where possible, evidence your answer (1,350 characters maximum, approximately 200 words).

Q31. Should UKRI require preprints to be made OA where there is a significant benefit with regard to public emergencies?

Yes

No

Don't know

No opinion.

If yes, is there a recognised definition of 'public emergency' and/or protocols that UKRI should consider if this policy is implemented? (1,350 characters maximum, approximately 200 words.)

Elsevier actively encourages preprints to be shared anywhere at any time because we have not invested resources or added value to them. We fully support the facilitation of access to early research, in a range of situations beyond public emergencies. Early visibility of their work helps researchers gain feedback and recognition for their outputs, and by extension facilitate new collaborations and ideas. Our ownership of preprint server [SSRN](#) and our [sharing](#) policies demonstrate our commitment to access to preprints and to authors' freedoms to share them without limitations. We have also worked with SSRN on a range of pilots, such as [Sneak Peek](#) and [First Look](#), which enable researchers to discover preprints from a range of titles, including those from The Lancet and Cell Press.

Moreover, looking beyond Open Access, the COVID-19 pandemic provides a clear example of when we can work collaboratively and pragmatically to make both early research as well as peer-reviewed articles freely available. We have therefore committed to provide additional free access to relevant content during the COVID-19 pandemic, for instance through our [resource centres](#). We are keen to explore further avenues of collaboration in this regard.

Q32. Are there any supporting actions that UKRI could take alongside its OA policy to support the use of preprints in all disciplines?

Yes

No

Don't know

No opinion.

If yes, please expand (1,350 characters maximum, approximately 200 words).

As above, we support broad author sharing and reuse of preprints, given that no value has been added by publishers (through editing, peer-review, and other processes). We suggest that UKRI's draft policy could also be used to incentivise sharing of preprints. We would also welcome further dialogue on how to ensure best practice and safeguard research integrity when utilising preprints.

More broadly, we suggest that UKRI consider the range of research outputs that are publicly funded and/ or do not yet include any value-add from the private sector. These outputs, including preprints, research data, project reports and methods can and should be made immediately available. We would welcome further discussions on how best to make this kind of research available.

Section B: Monographs, Book Chapters and Edited Collections

Q33. To what extent do you agree or disagree that the types of monograph, book chapter and edited collection defined as in-scope and out-of-scope of UKRI's proposed OA policy (see paragraphs 96-98 of the consultation document) are clear?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

No opinion.

If you disagree, please explain your view (2,000 characters maximum, approximately 300 words).

These types of works can be difficult to define, given that they can change over time as the corresponding research is disseminated (for example, a work can start out as a monograph but can ultimately become a trade book for broader dissemination). Clearer definitions will be required to avoid confusion, taking into account the often fluid nature of these works.

Here we provide an overall steer for our answers in Section B, with general reference to our fundamental points set out in Section A of our response. We support UKRI's objectives to make content freely available. Equally, publishing research requires sustainable business models in order to contribute to a leading UK publishing sector.

UKRI's proposed OA policy for long-form research outputs presents challenges, including:

- *OA in long-form research outputs is a space where publisher models are still evolving.*
- *Clarity, particularly regarding funding, is necessary to understand how best to meet UKRI's objectives in its policy for long-form publications, for instance in relation to Pay-to-Publish models.*
- *Researchers will need more detail and clarification to fully comply with this policy.*

Importantly, while we welcome that UKRI acknowledges the need for embargo periods under a Pay-to-Read route, embargos should reflect the investments and efforts put into the relevant content, and the period over which we recoup our investments. The Pay-to-Read model that supports Green OA will be undermined if free substitutes are made available at too short a time period, because buyers and subscribers will not pay for something that has been made free elsewhere. This would also constitute a de facto price cap. UKRI's proposal for a 12-month embargo period is therefore not viable for all types of long-form publication currently being invested in.

We suggest that UKRI takes a flexible approach towards its long-form research policy to enable further development of suitable models.

Q34. Should the following outputs be in-scope of UKRI's OA policy when based on UKRI-funded doctoral research?

a. Academic monographs

Yes

No

Don't know

No opinion

b. Book chapters

Yes

No

Don't know

No opinion

c. Edited collections

Yes

No

Don't know

No opinion

Please explain your view (1,350 characters maximum, approximately 200 words).

We advocate for a consistent policy as far as possible. Nevertheless, the nature of these works can lead to complexities relating to funding. For instance, in edited works, a scenario can easily occur where only one of potentially 20 chapters is UKRI-funded, and the collection will be authored by multiple researchers. UKRI will need to take this complexity into account, and resolve it via further clarification, to ensure a successful policy implementation that will not hinder researchers.

Q35. To what extent do you agree or disagree that UKRI's OA policy should include an exception for in-scope monographs, book chapters and edited collections where the only suitable publisher in the field does not have an OA programme?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

No opinion.

Please explain and, where possible, evidence your view (1,350 characters maximum, approximately 200 words).

We support all options that enable the researcher community to determine the most suitable publication venue. The fact that OA in long-form publishing is still evolving should be taken into consideration, and therefore a flexible approach, including the use of exceptions, will make for a more successful OA policy implementation.

Prioritising researcher choice also supports researchers in their goal of publishing high quality research outputs. We support UKRI's goals in increasing OA uptake in the UK, but this should also complement and support the UK's international status for leading in high quality research output.

Q36. Are there any other considerations that the UK HE funding bodies should take into account when defining academic monographs, book chapters and edited collections in-scope of the OA policy for the REF-after-REF 2021?

Yes

No

Don't know

No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

Please see paragraphs 29-31 of the consultation document before answering this question

As per previous answers relating to the REF-after-REF 2021, we would advocate for a consistent approach towards both policies to avoid confusion and challenges for researchers when working to ensure compliance. Further we would advocate for a flexible approach, particularly in relation to long-form publications given their nascent and evolving profile.

Q37. Regarding monographs in-scope of UKRI's proposed OA policy, which statement best reflects your view on the maximum embargo requirement of 12 months?

- a. 12 months is appropriate
- b. A longer embargo period should be allowed**
- c. A shorter embargo period should be required
- d. Different maximum embargo periods should be required for different discipline areas
- e. Don't know
- f. No opinion

Please explain and, where possible, evidence your answer. If you answered b, c or d please also state what you consider to be (an) appropriate embargo period(s) (1,350 characters maximum, approximately 200 words).

We agree with the general principle of an embargo period to ensure a sustainable publishing model. We also ask for consistency of principles across UKRI's policy. If UKRI is committed to following a Pay-to-Read Green OA route, this should be sustainable for both research articles and long-form publications – a key aspect of which is reasonable embargo periods.

Publishers make significant investments into long-form publications, including development costs at the Accepted Manuscript stage. Incentives for publishers to invest will be harmed by a 12-month embargo, which is often an insufficient amount of time to recoup the above-mentioned investments. This system becomes unsustainable: buyers will not pay for content if there is a freely available substitute. This would undercut the Pay-to-Read business model which enables these works to be published, and would in turn harm the UK publishing industry. A flexible approach to embargo periods should therefore be maintained under UKRI's policy.

Q38. Regarding book chapters in-scope of UKRI's proposed OA policy, which statement best reflects your view on the maximum embargo requirement of 12 months?

- a. 12 months is appropriate
- b. A longer maximum embargo period should be allowed**
- c. A shorter maximum embargo period should be required
- d. Different maximum embargo periods should be required for different discipline areas
- e. Don't know
- f. No opinion

Please explain and, where possible, evidence your answer. If you answered b, c or d please also state what you consider to be (an) appropriate embargo period(s) (1,350 characters maximum, approximately 200 words).

Please see our answer as at Question 37. We believe a flexible approach towards embargos will best meet UKRI's policy.

Q39. Regarding edited collections in-scope of UKRI's proposed OA policy, which statement best reflects your view on the maximum embargo requirement of 12 months?

- a. 12 months is appropriate

b. A longer embargo period should be allowed

c. A shorter embargo period should be required

d. Different maximum embargo periods should be required for different discipline areas

e. Don't know

f. No opinion

Please explain and, where possible, evidence your answer. If you answered b, c or d please also state what you consider to be (an) appropriate embargo period(s) (1,350 characters maximum, approximately 200 words).

Please see our answer as at Question 37. We believe a flexible approach towards embargos will best meet UKRI's policy.

Q40. Do you have any specific views and/or evidence regarding different funding implications of publishing monographs, book chapters or edited collections with no embargo, a 12-month embargo or any longer embargo period?

Yes

No.

If yes, please expand (2,000 characters maximum, approximately 300 words). Please note that funding is further considered under paragraph 110 of the consultation document (question 53).

Publishing OA for long-form research is still an area where experimentation, as for OA in research articles, is still taking place. Elsevier has recently implemented its own [OA Books Policy](#) utilising the Pay-to-Publish (Gold) OA model, and much is being learned from its implementation. UKRI is forging ahead of others with its OA policy for long-form publications, but an unclear policy approach, particularly in relation to funding, will cause confusion for researchers and inhibit UKRI's objectives of increasing OA uptake.

While UKRI's policy proposes access to a final version of record, the policy does not clarify details for funding this kind of access. In order for publisher experimentation and implementation of book and monograph OA publishing to continue, UKRI's policy could be clear and supportive of funds for Book Publishing Charges under the Pay-to-Publish model. This model will meet UKRI's objectives in enabling free and immediate access to the final content.

Equally, and perhaps more importantly in the absence of funding mechanisms for the Pay-to-Publish model, UKRI could support a sustainable Pay-to-Read route to achieve its policy goals, which we would fully support. However, implementing a policy that doesn't provide a flexible and sustainable approach towards the Pay-to-Read (Green) OA route, with the use of reasonable embargo periods, will prove unviable and would ultimately risk harming UK publishing sector more broadly (as at Question 37).

In addition, and to note, researchers receive royalties from publishers from their publications. Incentives for researchers to publish books may be undermined if they instead must Pay-to-Publish and hope for royalties from any sales.

UKRI's proposals therefore risk being unworkable if no viable funding options are proposed for a Pay-to-Publish route, while the Pay-to-Read route is governed by unsustainable embargo periods.

Q41. To what extent do you agree that self-archiving the post-peer-review author's accepted manuscript should meet the policy requirement?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

No opinion.

Please explain and your view (1,350 characters maximum, approximately 200 words).

UKRI's objectives of access to research can be met under the Pay-to-Publish model, enabling deposit into repositories. Equally, Accepted Manuscripts can also be deposited into repositories following an embargo period under the Pay-to-Read (Green) OA route. These embargo periods must nonetheless reflect the time needed to recoup investments. For instance, as part of our investments, Elsevier actively commissions books, meaning that value has been substantially added to Accepted Manuscripts. If UKRI is to implement the Green OA route, its policy should provide a flexible and sustainable approach towards Green OA, including the use of reasonable embargo periods, i.e. beyond 12 months where appropriate.

Q42. Regarding monographs, book chapters and edited collections, are there any additional considerations relating to OA routes, deposit requirements and delayed OA that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021?

Yes

No

Don't know

No opinion.

If yes, please expand (2,650 characters maximum, approximately 400 words). Please see paragraphs 29-31 of the consultation document before answering this question.

Please see our answer at Question 36.

Q43. To what extent do you agree or disagree with CC BY-ND being the minimum licencing requirement for monographs, book chapters and edited collections in scope of UKRI's proposed OA policy?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Don't know

No opinion.

Please explain and, where possible, evidence your view (1,350 characters maximum, approximately 200 words).

We support all options that enable the researcher community to determine the use and reuse of their works. Researchers should have the options to choose the license that best reflects their preferences. We believe an exception for all alternative reuse licenses would be the most pragmatic implementation of UKRI's policy, particularly for such a nascent area as long-form research. Limiting license choices here will also be harmful to publisher incentives to develop and experiment in OA long-form research.

We frequently find that researchers prefer alternative licenses when given the option. Creative Commons licenses such as CC BY NC ND protect the integrity and quality of research outputs; provide ways of ensuring that publisher investments in publications can be recouped; and still enable that research to be easily made available and developed upon.

Q44. To what extent do you agree or disagree that UKRI's OA policy should include an exception for in-scope monographs, book chapters and edited collections requiring significant reuse of third-party materials?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

No opinion.

Please explain your view (1,350 characters maximum, approximately 200 words). Questions 45-46 concern how 'significant reuse' may be defined.

We agree that an exception of this nature should be included to avoid further complexity, given that content within works may be licensed under more restrictive terms. The lack of an exception could

even mean that content is ultimately not published if the right permissions are not granted. We again suggest that UKRI maintains consistency across its policy with regards to these kinds of exceptions.

Q45. To what extent do you agree or disagree that if an image (or other material) were not available for reuse and no other image were suitable, it would be appropriate to redact the image (or material), with a short description and a link to the original?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

No opinion.

Please explain your view (1,350 characters maximum, approximately 200 words).

We agree with the general principle here, to avoid complexity. We nonetheless question the practicality of this kind of approach should a substantial amount of content be unsuitable for reuse. This could cause challenges for researchers (and publishers, including extra costs) in expressing their research clearly and efficiently, while also further burdening them with requirements to redact and re-label content.

Q46. Do you have a view on how UKRI should define 'significant use of third-party materials' if it includes a relevant exception in its policy?

Yes

No

Don't know

No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

Guidance and clarification from UKRI would be helpful for all stakeholders working to comply with UKRI's policy.

Q47. Do you have any other comments relating to licensing requirements and/or the use of third-party materials, in relation to UKRI's proposed OA policy for academic monographs, book chapters and edited collections?

Yes

No.

If yes, please expand (1,350 characters maximum, approximately 200 words).

Q48. Regarding monographs, book chapters and edited collections, are there any additional considerations relating to licensing requirements and/or third-party materials that you think that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021?

Yes

No

Don't know

No opinion.

If yes, please expand (2,650 characters maximum, approximately 400 words). Please refer to paragraphs 29-31 of the consultation document before answering this question.

Q49. Which statement best reflects your views on whether UKRI's OA policy should require copyright and/or rights retention for in-scope monographs, book chapters and edited collections?

- a. UKRI should require an author or their institution to retain copyright and not exclusively transfer this to a publisher
- b. UKRI should require an author or their institution to retain specific reuse rights, including rights to deposit the author's accepted manuscript in a repository in line with the deposit and licensing requirements of UKRI's OA policy
- c. UKRI should require an author or their institution to retain copyright AND specific reuse rights, including rights to deposit the author's accepted manuscript in a repository in line with the deposit and licensing requirements of UKRI's OA policy
- d. UKRI's OA policy should not have a requirement for copyright or rights retention**
- e. Don't know
- f. No opinion

Please explain and, where possible, evidence your answer. If you selected answer b or c, please state what reuse rights you think UKRI's OA policy should require to be retained (2,000 characters maximum, approximately 300 words). It is not necessary to repeat here, in full, information provided in response to question 12.

Please note that views are not sought on whether institutions should hold the copyright to work produced by their employees as this is subject to Section 11 of the Copyright, Designs and Patents Act 1988 and institutional copyright policies.

We support and implement policies that fully enable researchers to retain copyright over their works. Equally, it is a pragmatic and typical approach to utilise copyright in order to publish, disseminate and safeguard researchers' content. Publishers rely on monetising reuse as part of the broader

ecosystem of recouping investment in publishing. Without acknowledgement of publisher business models, applicable policies could damage publisher incentives to invest, and the longer term quality of research outputs, as revenues and subsequent investments deteriorate. We therefore do not agree that author retention of copyright should be mandatory at this stage.

Q50. Regarding the timing of implementation of UKRI's OA policy for monographs, book chapters and edited collections, which statement best reflects your view?

- a. The policy should apply from 1 January 2024
- b. The policy should apply earlier than 1 January 2024
- c. The policy should apply later than 1 January 2024**
- d. Don't know
- e. No opinion

Please explain and, where possible, evidence your answer. If you selected b or c, please also state what you consider to be a feasible implementation date (2,000 characters maximum, approximately 300 words).

While we support UKRI's objectives, we request that more time is allocated to the implementation of this aspect of UKRI's policy focusing on long-form publications. Key reasons include:

- *This component of UKRI's policy – i.e. OA in long-form research – goes further than many other countries, meaning that we are treading into unknown territory and will need to better assess impacts*
- *The evolving nature of OA models in books, monographs and long-form publications*
- *The length of time taken to plan and prepare for book publication means that publishers simply have too short a time frame to implement this policy by the 2024 deadline*

Q51. In order to support authors and institutions with policy implementation UKRI will consider whether advice and guidance can be provided. Do you have any suggestions regarding the type of advice and guidance that might be helpful?

Yes

No.

If yes, please expand (2,000 characters maximum, approximately 300 words).

Researchers will need clarifications as to aspects of this policy, including definitions of long-form publications, as well as understanding on obtaining adequate funds and models for publication. For example, the policy is unclear on some fronts as to how funding will apply under the differing circumstances that books, monographs and edited collections are published, particularly when there are multiple contributors. Funding levels and mechanisms must cover these range of considerations and information made clear to authors.

Q52. Regarding monographs, book chapters and edited collections, are there any other considerations that UKRI and the UK HE funding bodies need to take into account when considering the interplay between the implementation dates for the UKRI OA policy and the OA policy for the REF-after-REF 2021 OA?

Yes

No

Don't know

No opinion.

If yes, please expand (2,650 characters maximum, approximately 400 words).

Q53. Do you have any views regarding funding levels, mechanisms and eligible costs to inform UKRI's considerations about the provision of funding for OA monographs, book chapters and edited collections in-scope of its proposed policy?

Yes

No.

If yes, please expand (2,650 characters maximum, approximately 400 words).

We ask for clarity and consistency in UKRI's policy as it relates to funding to support OA in long-form research. UKRI's policy could be met via a number of models, but these are evolving and UKRI is unclear on funding mechanisms to support this developing space. In the absence of further details on funding mechanisms, UKRI's proposals for a 12-month embargo are unsustainable and will not support UKRI's objectives of increasing OA in long-form publications. We therefore ask for a policy focusing on reasonable embargo periods to support the Pay-to-Read model.

Q54. To support the implementation of UKRI's OA policy, are there any actions (including funding) that you think UKRI and/or other stakeholders should take to maintain and/or develop existing or new infrastructure services for OA monographs, book chapters and edited collections?

Yes

No

Don't know

No opinion.

If yes, please state what these are and, where relevant, explain why UKRI should provide support (2,650 characters maximum, approximately 400 words).

UKRI's economic assessment could help uncover how funds could be allocated or used to promote OA in long-form research. Models are developing under both the Pay-to-Read and Pay-to-Publish routes, but understanding how these will be funded will be critical to implementing a successful OA policy.

Q55. Are there any technical standards that UKRI should consider requiring and/or encouraging in its OA policy to facilitate access, discoverability and reuse of OA monographs, book chapters and edited collections?

Yes

No

Don't know

No opinion.

Please expand (2,000 characters maximum, approximately 300 words).

We advocate encouragement of the use of accepted industry standards within technical requirements, for instance to incentivise open research data practices; to ensure the use of DOIs to identify research; and to encourage transparency and integrity in research publication.

Q56. Do you have any other suggestions regarding UKRI's proposed OA policy and/or supporting actions to facilitate access, discoverability and reuse of OA monographs, book chapters and edited collections?

Yes

No

Don't know

No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

Section C – Monitoring Compliance

Q57. Could the manual reporting process currently used for UKRI OA block grants be improved?

Yes

No

Don't know

No opinion.

If yes, please explain how (2,000 characters maximum, approximately 300 words).

Q58. Except for those relating to OA block grant funding assurance, UKRI has in practice not yet applied sanctions for non-compliance with the RCUK Policy on Open Access. Should UKRI apply further sanctions and/or other measures to address noncompliance with its proposed OA policy?

Yes

No

Don't know

No opinion.

Please explain your answer (2,000 characters maximum, approximately 300 words).

Rather than imposing sanctions for non-compliance, it would be instructive to understand the reasons for non-compliance so that barriers can be identified and removed. Reasons may pertain to a range of factors -e.g. lack of awareness or confusion about policy or how to implement it; lack of funding to pay for APCs; and other factors. Building researcher buy-in and addressing genuine obstacles is likely to be a more effective long-term path to achieve OA than imposing sanctions that are perceived by stakeholders to be punitive.

Q59. To what extent do you agree or disagree with the example proposed measures to address non-compliance with the proposed UKRI OA policy (see paragraph 119 of the consultation document)?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

No opinion.

Please explain your answer (2,000 characters maximum, approximately 300 words).

Please see response to Q58: we suggest the focus is first on understanding reasons for non-compliance so they can be addressed, rather than on the measures for addressing (i.e. communicating that there has been) non-compliance.

Section D – Policy implications and supporting actions

Q60. Do you foresee any benefits for you, your organisation or your community arising from UKRI's proposed OA policy?

Yes

No

Don't know

No opinion.

Please expand (2,650 characters maximum, approximately 400 words).

We support and share UKRI's objectives in making research freely and immediately available. We believe that the most effective means to achieve UKRI's goals is via a Pay-to-Publish OA model, and while we have outlined the challenges with this model, we are keen to contribute, alongside all stakeholders, to its successful implementation.

Publishers' investments help ensure that trust and integrity of peer-reviewed works, the high quality of which has made the UK a leader in both Research and the publication of Research. An OA policy which lacks consistency, clarity and acknowledgement of publisher investments may ultimately harm this ecosystem. A successful OA policy is one where all stakeholders contribute and collaborate to ensure its pragmatism, sustainability and resulting perpetuity. It does not follow that this outcome will mean financial benefits to us. Nevertheless, a policy of this nature will ensure continued dialogue and partnership between stakeholders in the research system, as well as ensure effective and immediate access to research outputs. This will of course lead to a range of benefits for all stakeholders in the UK research community, and to the continued success of UK research on the global stage.

Q61. Do you foresee UKRI's proposed OA policy causing and/or contributing to any disadvantages or inequalities?

Yes

No

Don't know

No opinion.

If yes, please expand, referencing specific policy elements and including any comments on how UKRI could address any issues identified (2,650 characters maximum, approximately 400 words).

We have outlined above that the funding implications of the UK transitioning to a Pay-to-Publish model for UK articles (alongside Pay-to-Read for non-UK, non-OA articles) may lead to imbalances, for instance with some research institutions paying more than others, depending on the volume of their research outputs. Institutions will of course be affected differently and, therefore, unequally.

A policy that excludes hybrid journals could disadvantage Early Career Researchers if they cannot publish in such titles, since 88% of journals fall into this category.

More broadly, we recommend that a full audit of UKRI's policy for Equality, Diversity and Inclusion (EDI) considerations takes place to ensure that any relevant issues are addressed. We welcome supporting such an assessment and providing our own insights, gathered from relevant research and activities we have carried out in this area. These include:

- *We recently published our third [Gender Report](#), examining research participation, career progression and perceptions of gender globally. The insights gathered aim to be used by Governments, researchers, institutions and Funding Bodies alike, and include specific suggestions for interventions.*
- *To further improve gender balance and improve inclusive research both within Elsevier and across academic research globally, our CEO Kumsal Bayazit and Editor of The Lancet Richard Horton have established a distinguished board of academic scientists, policymakers, Inclusion & Diversity/gender researchers, and professionals in STEM who are committed to driving change in gender balance and more inclusive research.*

- *In 2018, all Lancet journals committed to achieving gender parity on their advisory boards by 2020; The Lancet Infectious Diseases met their target in February with 12 women and 11 men. Today, our journals average a 22-78% female to male ratio across the board. We are committed to tracking and improving these numbers going forward.*

We welcome dialogue on these kinds of activities, with particular reference to UKRI's policy.

Q62. Do you foresee any positive and/or negative implications of UKRI's proposed OA policy for the research and innovation and scholarly communication sectors in low-and-middle-income countries?

Yes

No

Don't know

No opinion.

If yes, please expand, referencing specific policy elements and including any comments on how UKRI could address any issues identified (2,650 characters maximum, approximately 400 words).

An objective behind UKRI's policy is to encourage a global shift to OA. This combined with the policy's focus on a model for immediate access that aligns with the Pay-to-Publish (Gold) OA route, could present barriers for Low and Middle Income Countries (LMICs). These countries have previously expressed [concerns](#), in particular around funding Article Publishing Charges under Pay-to-Publish (Gold) models, and that subsequently the Gold OA model increases the likelihood of global inequities. That is why alternative models such as Diamond OA are often more appealing to them. We, as an industry, partner to ensure that many within LMICs are still able to access and fund the publication of their research via [Research4Life](#) and other programs, but this won't resolve every challenge to LMICs in adapting to Pay-to-Publish models at an increasing scale. Coordination must therefore take place amongst all stakeholders to ensure increasing adoption of OA does not exacerbate these inequities. Again, at a global level, flexible approaches to OA, including a range of OA models, timelines and partnerships, can alleviate transitional pressures.

Q63. Do you anticipate any barriers or challenges (not identified in previous answers) to you, your organisation or your community practising and/or supporting OA in line with UKRI's proposed policy?

Yes

No

Don't know

No opinion.

If yes, please expand, including any supporting actions you think UKRI could undertake to remove or reduce any barriers identified (2,650 characters maximum, approximately 400 words)

Elsevier fully supports OA and is now one of the world's largest open access [publishers](#).

However, the fact that Pay-to-Publish has existed as a model for almost two decades, and still accounts for only 20% of articles published indicates that there are significant barriers to the model's adoption ("demand"), particularly since the vast majority of journals enable this option ("supply").

These barriers can be addressed, but not if they are ignored. They will not simply disappear with a top-down mandate. They are structural, reflecting the global nature of publishing, including the need for researchers to read articles from around the world, alongside the desire to make articles from a location (in this case the UK) Open Access.

The two key barriers are: (a) funding flows and levels, so that a research-intensive nation (the UK) and its research-intensive institutions can pay to make their own outputs OA on a Pay-to-Publish basis in the long term, while in the short to medium term also continuing to access 93% of non-UK articles, most (80%) of which are not OA. [See Question 20]; and (b) Researcher preference, since even when policies exist and funding for Gold OA is made available, authors do not always comply. These reasons need to be understood and addressed at source.

No single stakeholder can or should address these complex challenges. All stakeholders will need to engage. We strongly advocate for collaborative and sustained engagement among funders, universities, publishers and researchers to identify pragmatic ways to address challenges.

Q64. Are there any other supporting actions (not identified in previous answers) that you think UKRI could undertake to incentivise OA?

Yes

No

Don't know

No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

Given the magnitude and complexity of UKRI's ambition, we suggest that UKRI forms a multi-stakeholder forum to ensure collaborative and sustained engagement among funders (i.e. UKRI), institutions, publishers and researchers. Its aim would be to shape and monitor policy implementation, identify barriers to overcome, and to recommend pragmatic ways to address them. We also propose pilots to test out ideas, and we welcome partnering with UKRI so that the risks and benefits of models can be tested and validated before wide-scale implementation.

Q65. Do you foresee any other implications (not identified in previous answers) for you, your organisation or your community arising from UKRI's proposed OA policy?

Yes

No

Don't know

No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

We have raised our points about implications in previous answers, so have none further to add here.

Section E – Further comments

Q66. Do you have any further comments relating to UKRI’s proposed OA policy?

Yes

No.

If yes, please expand (2,650 characters maximum, approximately 400 words.)

We have raised our points about implications in previous answers, so have none further to add here.

Q67. Do you have any further comments relating to commonality between UKRI’s proposed OA policy for outputs acknowledging UKRI funding and the OA policy for the REF-after-REF 2021?

Yes

No.

If yes, please expand (2,650 characters maximum, approximately 400 words.)

Q68. Do you have any further thoughts and/or case studies on costs and/or benefits of OA?

Yes

No.

If yes, please expand (2,650 characters maximum, approximately 400 words)

We presume that UKRI has the relevant facts, e.g. volume and annual growth of articles published annually within and outside the UK; the price paid by UK institutions to access all Pay-to-Read articles; the average APCs that would be applied to make UK articles available on a Pay-to-Publish basis; the revenues of UK-based publishers (overall, and from journals vs books vs. other content); the tax contributions of UK publishers. We can provide these data should they be needed.

We also presume, and would expect, that the Economic Impact study which UKRI is commissioning will take into account these facts when modelling the cost and benefit of proposed policies.