

December 13, 2013

Re: Consultation on the draft Tri-Agency Open Access Policy

To: openaccess@nserc-crsng.gc.ca

Dear Sir/Madam,

Thank you for the opportunity to provide input to the Canadian Tri-Agency Open Access Policy, available at http://www.nserc-crsng.gc.ca/NSERC-CRSNG/policies-politiques/Tri-OA-Policy-Politique-LA-Trois_eng.asp

For full background prior to our input, here is a summary of our organization, including our activities and credentials in open access publishing and policy.

About Elsevier

Elsevier is a world-leading provider of scientific, technical and medical information products and services. The company works in partnership with the global science and health communities to publish more than 2,000 journals, including *The Lancet* and *Cell*, and close to 20,000 book titles, including major reference works from Mosby and Saunders. Elsevier's online solutions include ScienceDirect, Scopus, SciVal, Reaxys, ClinicalKey and Mosby's Suite, which enhance the productivity of science and health professionals, helping research and health care institutions deliver better outcomes more cost-effectively.

Open Access Articles and Journals at Elsevier (Gold Open Access)

Elsevier has been providing open access publishing options since 2005. Today, researchers can choose to publish open access in over 1,600 established peer-reviewed journals as well as 73 full open access journals and these numbers will continue to grow rapidly. All of Elsevier's gold or hybrid open access publications have been peer-reviewed, ensuring that the broader community not only reads the latest research but that it is factual, original and of the highest quality and ethical standards.

Open Archives (a.k.a. Delayed Access) at Elsevier

Elsevier enables subscribers and the general public to have <u>open access to archived material in 97 journals</u> on the original publication platform. This includes all Cell Press articles after 12 months via the Cell Press website.

Articles are made open access after an embargo period which begins from the final publication date of the article. The embargo periods are determined by the characteristics of the journal

including subject area, usage patterns and frequency of publication. The final published articles featured in the archives are permanently free for everyone to read and download from their official publication platform, are the guaranteed version of record with any future updates included, and sustained by their initial subscription period.

Posting and Archiving Policies at Elsevier (a.k.a. Green Open Access)

Authors who publish in Elsevier journals can post a free draft copy of their article to a repository or website following <u>some simple guidelines</u>. This is often referred to as green open access. Unlike the gold open access model:

- There are no article publishing fees for the author to pay under this model of open access
- Open access is not immediate, but happens after an embargo period this is because
 publication costs are paid for by library subscriptions and libraries will (understandably)
 not subscribe if the content is available for free immediately or after an overly short
 embargo
- It requires effort by the author and his/her institution the author needs to save the correct version (depending on a journal's or publisher's policy) of the article for posting to a repository, and the repository will need to add links and metadata to the hosted article

For full information about Elsevier's open access program and policies, please visit www.elsevier.com/openaccess

Input into Tri-Agency Open Access Policy, by Section

Section 1 & 2

Elsevier shares the mission of all three agencies in disseminating scholarly output to the widest possible audience, and strongly supports the principles guiding the Agencies in promoting open access to research publications. These resonate well with our own commitment to universal access to scholarly information in ways that protect the quality and integrity of the scientific record and that are sustainable for all stakeholders.

Section 3.1 Peer-reviewed Journal Publications

We particularly welcome the clear statement in Section 3.1 - that the cost of publishing in open access journals is an eligible expense under the "Use of Grant Funds". Elsevier firmly believes that gold open access is a sustainable form of open access, and would recommend budgeting funds specifically for this, as has been done by Research Councils UK, in order to get the highest levels of compliance. As we mentioned above, we provide very many gold open access options to authors, and also have 97 journals which make their archives available after a certain period of time (many, like Cell Press journals and more, do this after 12 months).

As regards Option 2 (archival of the final peer-reviewed full-text manuscript in a digital archive) our input is that the blanket 12-month embargo prior to public availability is not always sustainable. Unlike option 1 this is not a business model, and needs to work in tandem with an

independent model such as gold open access or subscriptions. If used in tandem with subscriptions, an appropriate amount of time is needed for journals to deliver value to subscribing customers before the manuscript becomes available for free. Journals are different from one another, so one size does not fit all. Ideally, embargoes should be set on a title-by-title basis by publishers who bear the financial burden and who are best placed to determine when posting manuscripts would not damage the journal which publishes the final versions of the items being posted. We welcome working with other stakeholders – in particular funders – who we recognize seek influence over embargo lengths.

Elsevier uses an evidence-based approach to setting embargo periods for its journals, which takes into account the usage profile of the journal over time, and helps us decide at what point we believe it is sustainable to allow parallel distribution of a free version of the article. Our embargo periods typically range from 12-24 months, but some are longer and some are shorter depending on the specific characteristics of the journal. For example our news-breaking Lancet titles can be sustainable with only a 6 month embargo period, and some review titles require a longer embargo of 36 months in order to be sustainable. We regularly review and refine these embargo periods as necessary.

It is worth noting that very many Elsevier journals <u>do</u> have an embargo period of 12 months, but not all. It would limit the freedom of authors to publish in their preferred journal if they had to choose only ones with a 12-month embargo period.

As such we strongly recommend the language be altered to allow more flexible approaches to embargo periods, and not a blanket 12-month embargo period.

Section 3.2 Publication-related Research Data

At http://researchdata.elsevier.com/ we outline Elsevier's goals which are aligned with yours:

- Help increase archiving and sharing of research data
- Help increase the discoverability and value of shared data with annotation, context, provenance
- Foster and assist with the credit and impact assessment of research data for the researcher, the institution, and the funding bodies, making research data first-class research outputs

As such, we fully support efforts from funders to encourage authors to retain, share and manage underlying research data. If our Research Data Services group can be of any assistance to the Tri-Agency team in this regard, please let us know.

Section 4

No input.

Section 5

Open access models for other publication types are at a very early stage of development and are not as immediately suited to the existing OA models and mechanisms, therefore we agree that it is not appropriate to include these in the policy at this time.

Section 6

We recommend encouragement and enablement over strict policing, in order to maximize compliance by researchers with good will. From our experience of similar policies, researchers are generally happy with open access in principle, but 100% compliance is extremely hard to guarantee, and the monitoring itself can potentially divert time and resources away from research. We believe that the FundRef (http://www.crossref.org/fundref/) initiative, of which Elsevier is a part, would be extremely useful to help you identify and report on articles resulting from Tri-Agency funding. We would also recommend you encourage all your grant recipients to register with ORCID (http://orcid.org/) to better distinguish themselves from other researchers, and help all funders, institutions and publishers better monitor research activity.

Section 7

No input.

Managing the transition to more open access via policy is best done in partnership, and we firmly believe that policies that allow maximum participation from all stakeholders will enable the smoothest and most comprehensive implementation. We look forward to working with you, and appreciate this opportunity to share our views.

Yours faithfully,

Dan Morgan Senior Manager – Global Academic Relations (North America) ELSEVIER 201 Mission St. 26th floor, San Francisco, CA 94105, USA

Office: +1 415-616-4450 :: Cell: +1 619-246-3600

d.morgan@elsevier.com