Summary of Elsevier's response to UKRI[1] Open Access Review consultation

Elsevier believes in advancing research and healthcare outcomes through more open, reproducible and collaborative scholarly communication and knowledge systems.

We fully support UKRI's objectives to make articles authored by UKRI-funded researchers immediately and freely available to the world.

The vast majority (over 90%) of Elsevier's journals already offer an immediate open access (Pay-to-Publish) option and we are committed to work towards immediate open access options across all remaining titles.

Publishers serve the research ecosystem, in the UK and globally, in the production and dissemination of peer-reviewed research. Key principles regarding published research articles include:
- They incorporate value-added features of the peer-review-publishing system
- These features are enabled by publishers' investments
- Publishers must be able to recoup their investments via sustainable business models to continue publishing research articles

Two funding models are proven at scale, and we believe acknowledging these in UKRI's policy will support the UK's global leadership in the Publishing and Research sectors:

"Pay-to-Read", or the subscription model – in which readers subscribe to access articles (representing around 80% of articles globally)

"Pay-to-Publish", or the Gold OA model – in which the author, their funder or institution pays an Article Publishing Charge (APC) to make the article free to all readers (representing around 20% of articles globally).

In our view, 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 (via subscriptions) for non-UK articles that are not yet open access (OA).

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 Open Access).

What are the challenges that must be addressed?

- There will be **funding implications** 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 the UK's research OA, as well as pay to read the rest of the world's non-OA research. Nevertheless, we are categorically not asking for, nor expecting, additional funds to bridge these gaps.
- **Research institutions will be particularly affected.** 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

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[1] UKRI is United Kingdom's national funding body. UKRI stands for UK Research and Innovation.

publication of their outputs, compared to those institutions that have no published output and so would pay no APCs.

- **Researchers will need to comply fully with UKRI's policy,** notwithstanding the fact that elsewhere this has not always happened even where OA policies existed and payments for APCs were provided by funders on behalf of researchers. At the same time, we hear from researchers that they want to have a say in where and how they publish their research, because their publication records affect their careers and the influence that their research can have globally.

How can we overcome these challenges?

- Elsevier is firmly committed to open and frictionless access to knowledge for everyone. Almost all of our journals already offer immediate (Pay-to-Publish) open access options and we will work with stakeholders to find sustainable paths for extending this to all our titles.
- In light of the size of the gap and the scale of the broader fiscal challenge that is faced by the UK and its research sector at this time, it is imperative that a viable Green OA approach (via the pay-to-read model) is maintained to ensure that opportunities to advance OA are not lost due to fiscal pressures.
- Under Green OA, <u>embargos cannot be removed altogether,</u> as – combined with a requirement for CC BY licenses – this will significantly harm the Pay-to-Read model supporting Green OA by making free article substitutes available that compete with the paid-for version. This also constitutes a de facto price cap. Undermining subscriptions in this way upends a model used by 80% of the world, and would significantly undermine the value and investments made to research outputs.
- Researcher compliance can be significantly increased by enabling authors to Pay-to-Publish in hybrid journals. Hybrids provide clear choices for researchers in their preferred publication, while enabling them to more easily choose to publish OA. Excluding hybrids from funding will ultimately remove OA options for researchers, and will not, therefore, accelerate OA adoption as per UKRI's policy objectives.

In summary, we fully support the UKRI's objectives and will work pragmatically and in good faith with all stakeholders to address the challenges posed by UKRI's draft policy.