

Elsevier response to Draft National guidelines for open access to scientific information

Elsevier welcomes the opportunity to offer comment on the Swedish Research Council's draft national guidelines on open access to scientific publications and research data. We support the Council's mission to make research funded with public funds openly available to other researchers and we welcome the Swedish Research Council's desire to align its own guidelines with the rest of Europe. We also note the ambitious targets set out for full transition to gold open access, for journal articles, books and artistic works funded with public money, by 2025 and VR's comments that the exact details to deliver this ambition require further consideration.

Open Access

Enthusied by VR's intention to cooperate with relevant stakeholders on how Open Access can be achieved by means of this open consultation on the web, we would like to offer the following comments on the draft guidelines in order to support the VR's mission and inform further thinking as to how to deliver the 100% gold OA target. In so doing we draw on our considerable experience of working with other funding bodies and institutions both in Europe and worldwide to help successfully deliver sustainable open access policies.

Hybrid titles

- Whilst fully open access journals operate the gold open access model alone, hybrid journals operate two distinct business models within the same journal: the traditional subscription model, typically for the majority of articles published in the journal; and the gold open access model, for those articles where an APC has been paid. For gold open access articles the final version is made immediately available for everyone to read.
- We believe that hybrid should play an important part in the transition to gold OA, as it offers authors a wider choice of publication outlets and enables them to publish in established journals, with well recognised 'brands' within the research community and established quality standards.
- We note the criticisms of hybrid open access journals as more expensive than fully open access journals, but would point out that this is a highly volatile market and most published pricing data is not current or does not factor in fee waivers granted by publishers. Elsevier, for example, reduced and varied its APCs for hybrid journals from April 2013 making our prices extremely competitive. Where APCs are higher this is often because of the publishing services provided, for example our premium titles – for example from Cell Press and The Lancet – have APCs that reflect the high rejection rate of articles (peer review costs must be covered for both accepted and rejected articles), expert editorial and statistical review of manuscripts, etc.
- We would therefore be concerned about the impact on researchers of any plans to "impose a ceiling on expenditure on hybrid publication" or that APCs for either gold or hybrid journals be "regulated", because the market for hybrid is very nascent and competitive, and because this could prevent academics having the freedom to publish in journals of their choice.

Funding for gold OA publication

- We welcome the Research Council's recognition that to achieve its ambitious target of transition to gold OA by 2025 additional resource will be required, specifically that the Ministry of Education and Research "push(es) for extra funds for OA publishing" during the transition period. This is crucial, as a transition to gold OA can only happen if there is funding to pay for this and a sound financial plan to support the implementation.
- We would also remind the Swedish Research Council of the fact that even if all of its research is published on a gold open access basis, libraries will still need to continue to subscribe to close to 90% of the rest of the world's research, published under the subscription model. Whilst open access content continues to grow at pace, the number of subscription articles published each year continues to rise too (by 3-4%). That is to say, gold OA publication costs will not *replace* subscription costs for at least the next few years, but will instead be additive.
- We would strongly caution against any list of journals eligible for gold OA funding. As well as posing a number of problematic issues such as the journal criteria for funding, adopting this approach would significantly undermine author choice as to the best publication vehicle for their research.

Green Open Access

- So as to assist with the transition to open access, VR may wish to consider a green open access option alongside gold. Such flexibility and the provision of an additional route to OA is helping to facilitate the transition to OA in the UK.
- Elsevier supports sustainable green OA, which allows for author self-archiving of an accepted manuscript and which can be made publically available after an embargo period. As green OA is supported by subscriptions, embargo periods for green open access must be carefully considered. The importance of variable, journal specific embargo periods to support green OA has been concluded by studies such as <http://www.publishers.org/attachments/docs/journalusagehalfife.pdf> Elsevier's own embargo periods similarly reflect this need for variation and our journal specific embargo periods typically vary between 12-24 months.

Open Data

- Elsevier is a signatory to the [STM Brussels Declaration](#) and supports the principle that raw research data should be made freely available to all researchers. We are working with other stakeholders to address the challenges associated with making research data accessible and shareable and a summary of the solutions we are developing to support researchers to store, share, discover and use data can be found here: <http://www.elsevier.com/about/research-data>
- We agree with the sentiment expressed in the draft policy that data sharing practices differ across disciplines and that these differences must be accounted for in any research data policy.

- We are actively engaged with a number of European and global study groups and research data organisations looking at open access to research data, for example the Research Data Alliance, FORCE 11 and RECODE. In line with the VRs desire to align its own guidelines with the rest of Europe, we would welcome the opportunity to discuss our activities with you further.
- We also believe we are well-positioned to partner with you on the proposed five year pilot project to make available publicly funded research data, across the spectrum of data storage, sharing access and reuse, and would welcome the opportunity to discuss this with you further.