



September 12, 2014

Elsevier response to Independent Review of RCUK policy

1. Elsevier welcomes the opportunity to respond to the independent review of the implementation of the RCUK's policy on Open Access.¹ Elsevier has consistently supported the implementation of the UK Government's open access policy, as set out in the recommendations of the Finch Working Group in June 2012, of which RCUK's open access policy is an extension. We outline the steps we have taken, some concerns that remain, and then answer the specific review questions posed by RCUK.
2. We are very happy to discuss any aspect of this submission further. Please contact Gemma Hersh, Director of Policy (g.hersh@elsevier.com).

Executive Summary

3. Elsevier supports sustainable open access, we believe the UK policy framework for open access is sustainable, and we have made a significant financial and operational commitment to the successful implementation of RCUK policy. This includes:
 - a. the launch of over 110 new gold open access journals
 - b. the availability of a gold OA publication option in over 1600 hybrid titles
 - c. we reduced and varied the Article Publication Charges (APCs) in our hybrid journals
 - d. we introduced an institutional prepayment scheme which brought cost savings of £250k in 2013 on top of the savings brought about by our reduced APCs
 - e. the shortening of our embargo periods to assist RCUK-funded authors with green open access compliance
4. These steps have helped compliance with the RCUK policy.
 - a. 26% of RCUK-funded grant recipients who published with Elsevier complied with the policy via the gold route. This compares with just 5% of other UK authors.
 - b. 95% of RCUK-funded authors that chose to publish on a gold open access basis chose to do so in one of our hybrid journals. Hybrid journals and their proven track record are attractive to authors, and encourage them to comply with the policy while publishing in the best journal for their research
5. Despite our efforts to support universities as they seek to fund two separate streams of content – the broadcast of RCUK-funded gold OA articles to the rest of the world, alongside subscription to the rest of the world's subscription content – it is clear that a funding shortfall remains. This is because the RCUK block grant falls short of the targets RCUK has set for gold OA publication. Gold OA will only be successful if it is properly funded and supported by all UK universities, and we suggest ways in which efficiencies in the system can be realised, for example through the central administration of funds.

¹ We refer to RCUK policy to describe the overarching policy framework within which individual UK Research Council policies have been formulated. RCUK policy is an extension of Government policy and in turn of the Finch Review recommendations, although not all of the UK research councils have aligned their policies in the same way.

6. Greater emphasis on sustainable approaches to green OA appear needed given the insufficient funding available and the lack of support from some universities for gold OA at all. Such an approach requires sustainable embargo periods and we remain deeply concerned about MRC's insistence on 6 month embargos; and should leverage existing publisher investments and systems rather than duplicating this effort. The CHORUS service in the US is an excellent example of how this can be achieved.
7. We have invested heavily in adapting our workflows to ensure smooth open access publishing. Whilst there have been some (though relatively few) errors in the details of execution along the way, for example in the labelling of content, we have taken steps to rectify this and have [shared openly our experiences](#).
8. Given the high proportion of RCUK-funded authors who are choosing a license other than CC-BY, often due to concerns about the commercial nature of the rights they will be granting in their work, the mandate of a CC-BY license may impede RCUK realising full compliance with its policy. 40% of RCUK-funded articles published by Elsevier via the gold route were under a CC license other than CC-BY.
9. The RCUK open access policy is part of a broader programme to expand access envisioned by the Finch Group and embraced by the Government. Elsevier has also been very active in this broader programme:
 - a. The Access to Research service gives free, walk-in access to a wide range of academic articles and research in public libraries across the UK. The service includes the articles authored by RCUK-funded researchers.
 - b. Elsevier is partnering with Jisc Collections on an access pilot for the NHS
 - c. We have launched an SME access pilot, in parallel and a Jisc Collections SME pilot

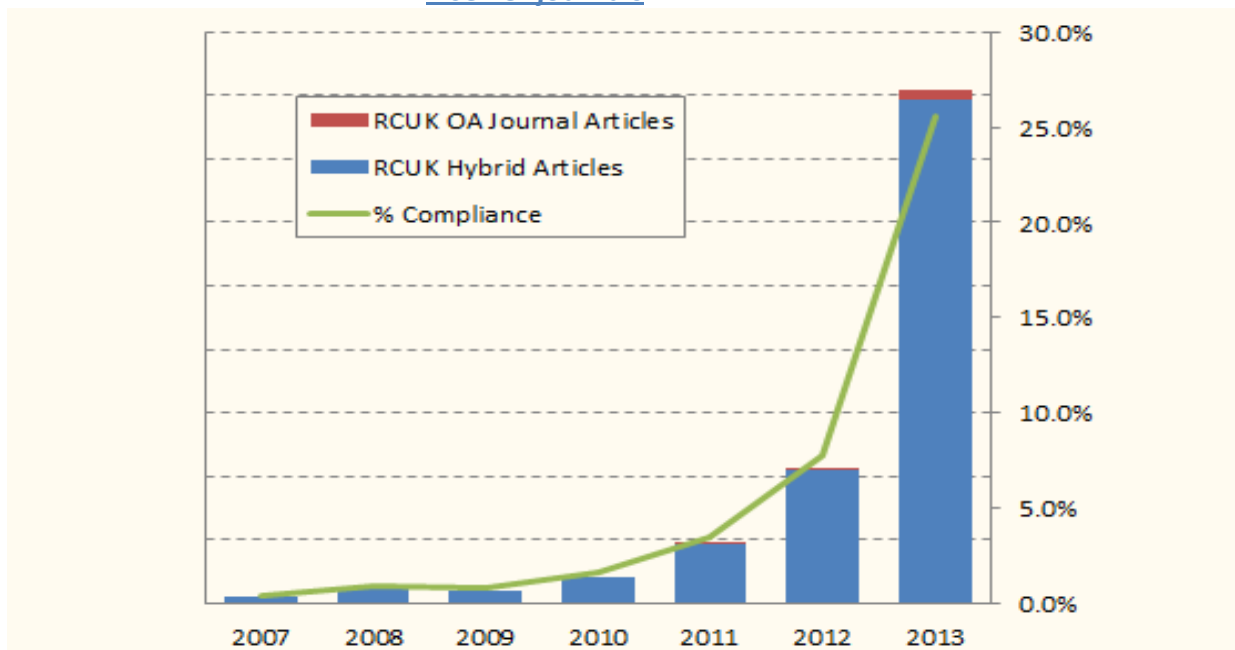
Review areas of focus

The effectiveness and impact of the RCUK policy on the transition of RCUK funded outputs (both within HEIs, IROs and research council funded institutes, centres, units and facilities) to open access.

10. The Review call for evidence asks for information on the impact of RCUK policy on the transition of RCUK-funded outputs to open access. To this end, we are pleased to offer the following information, which demonstrates how RCUK policy has incentivised open access in the UK:
 - Elsevier published over 29,000 UK-authored items in the UK last year.² Of these, 21% were funded by RCUK, equivalent to 6,206 papers.
 - Taking just the RCUK-funded papers, where one of the UK research councils are acknowledged by the author as a funding source, 26% of RCUK-funded authors publishing with Elsevier published via the gold route to OA. This compares with just 5% of authors publishing in the UK as a whole who published on a gold open access basis.
11. The following chart provides a graphic illustration of the impact of RCUK's policy on gold open access publication:

² This figure includes all publishable items, including articles, book chapters, conference proceedings and errata.

Percentage of gold open access articles authored by RCUK-funded researchers published in Elsevier journals



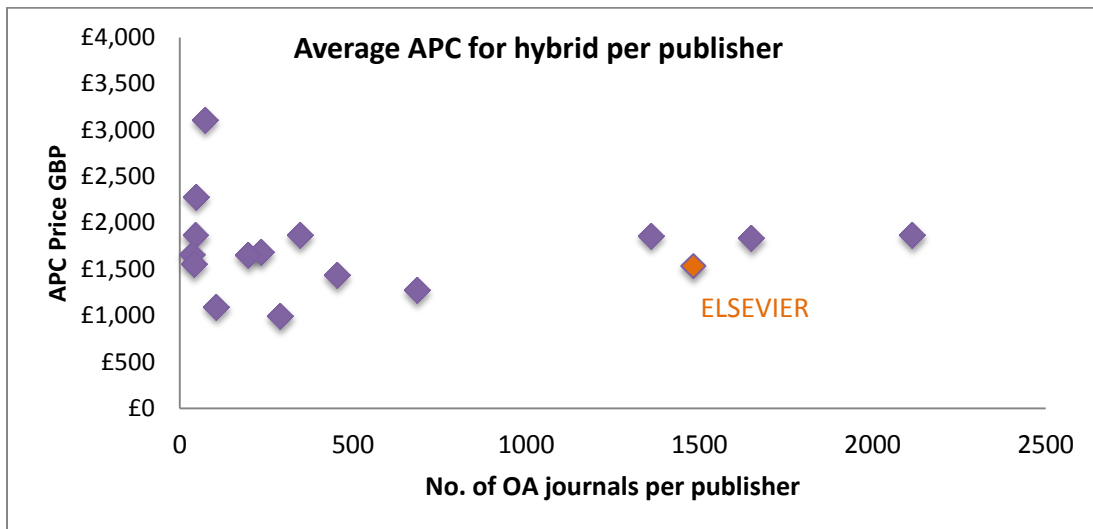
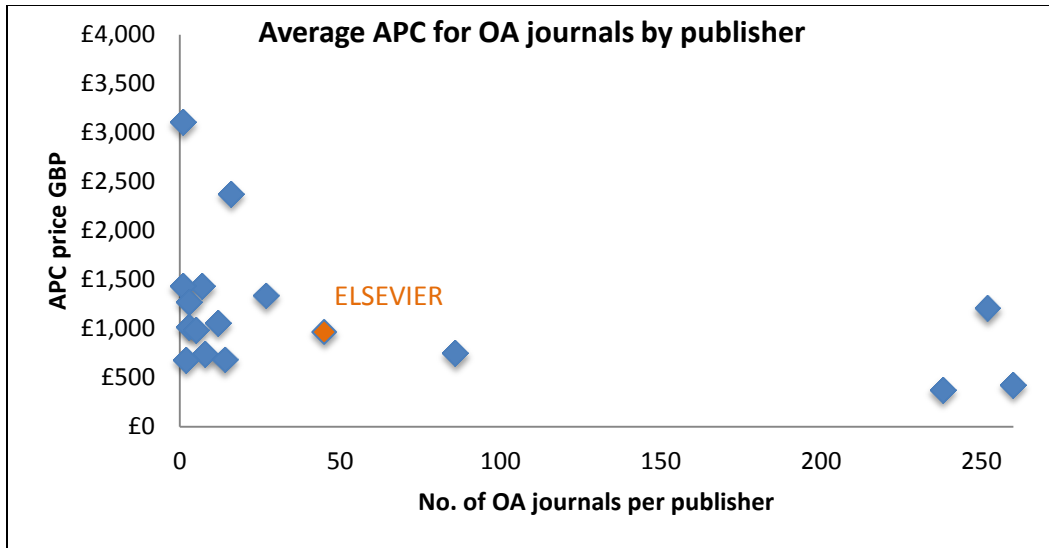
12. RCUK-funded authors tended to prefer to publish in one of our hybrid journals, with 95% doing so versus the remainder who published in one of our gold open access titles. This is indicative of the importance of hybrid journals in facilitating the transition to open access, in particular from the researcher's perspective, as they can both comply with the policy and publish in any journal they wish to, and often one which is established and recognised within their particular research community.
13. 100% of our titles offer authors some way to comply with UK research council policies and 90% offer two or more choices. In cases where only one open access choice (gold OR green) is available to researchers, this is typically where a journal has longer or shorter periods than those required by RCUK for green open access, for example the 6 month embargo period for biomedical research. The continuation of a 6 month embargo period may be skewing funding for gold open access at the expense of researchers funded by other research councils whose embargo periods align with government policy and with RCUK's overarching policy framework, as biomedical research (principally MRC) funded authors can only publish via the gold open access route with Elsevier.
14. Whilst it is too early to say at this stage whether RCUK's policy has been effective as, for example, gold open access targets and funding for years 3/4/5 are not yet clear and green open access cannot yet be measured, the following points are clear:
 - RCUK's policy has led to the publication of a greater number of gold open access articles, especially when compared to the rest of the world;
 - Allowing authors to publish on a gold open access basis in both gold OA journals and in hybrid journals has contributed to this success.

15. However, it is also clear that a funding shortfall is impeding gold open access in the UK. The modelling undertaken as part of the Finch Review included a “middle ground” average APC of £1,750. RCUK made £17m available through its APC fund in Year 1 of its policy. RCUK’s aim was for this £17m to fund 45% of papers in gold OA in Year 1. Taking the number of RCUK-funded outputs in 2013, 28,307³, £17m in funding at an average APC of £1750 would only fund 34% of RCUK articles and reviews. This 34% is not only shy of the 45% of articles and reviews RCUK anticipated being funded in year 1, but of course does not take account of the top-up funding some institutions provided to their researchers and the fact that those institutions continue to need to subscribe to non-UK subscription content which remains in the majority. Globally 87% of articles are published under the subscription model and subscription content continues to grow at a rate of 3-4% per year.
16. In recognition of the fact that universities do not have enough money to meet RCUK targets for Gold OA and are also having to pay for two separate streams of research i.e. having to pay to broadcast RCUK-funded research globally whilst continuing to subscribe to the majority of research published under the subscription model, we are working closely with JISC Collections to explore potential sustainable so-called “offsetting” models, that may further assist universities during the transition to manage these dual costs. For example, we have extended our Open Access Prepaid Plan for 2014-15, following a pilot in 2013. Our Prepayment Plan is aimed at universities and aids them in the affordability challenges of the transition to gold OA. Designed specifically for RCUK-funded articles because of the lack of funding for gold, institutions can prepay for OA at a preferable APC rate (10% discount) based on a projection of the number of gold OA articles they intend to publish. If institutions publish more gold OA articles than projected, these are published by us for free i.e. with no additional APC. Conversely, if institutions publish less gold OA articles than projected, we refund them. In other words, Elsevier provides a discount on our already reduced list price (see below), and also agrees to refund underspend. Our Prepayment pilot in 2013, of which our current plan is an extension, brought the sector savings of more than £250k last year alone.
17. We have also, separately, reduced our average APC list prices and introduced variable APC prices on our hybrid titles, with most of our journals in the £900-£1,900 range. We now have a broader distribution of prices which are tailored to specific communities and an average APC which is slightly lower than other publishers for our hybrid journals. Variations in APCs reflect a number of factors including competitive considerations; market conditions; journal impact factor; article type; journal function; editorial processes; and technical features.
18. A visual representation of our average APC price and in comparison to our competitors is as follows⁴:

³ Figures are estimated based on Scopus data

⁴ Figures converted from US Dollars to GBP, in line with conversion rates at 9 September 2014

19.



20. Elsevier’s APCs are competitive. APCs for Elsevier journals are in the £900-£1,900 range, with £1,240-£1,550 being the most common band, which is below the £1,750 average used for the Finch Review’s financial modeling. The average APC for our open access journals is £767 and for our hybrid journals our average APC by journal is £1,643, slightly lower than the industry average.

21. The combination of our APC list price reductions detailed above, alongside a 10% pre-payment discount as detailed here, means that we offer an APC discount for UK authors that matches the “offsetting” discount offered by other publishers. Elsevier has packaged its offering differently, and more transparently.

22. If RCUK is to reach its gold open access targets then additional funding is needed to address the compliance shortfall. As noted above the Year 1 target for Gold OA outputs for RCUK-funded research appears to have been missed. A similar scenario can be predicted for Year 2: RCUK’s block grant for Year 2 is £20m, expected to cover 53% of articles. Using 2013’s RCUK-funded article output of 28,307 (which will be higher in 2014), £20m would ‘buy’ RCUK 11,429 articles when calculated using the Finch APC average of £1750. This

means that 40% of RCUK articles would be published Gold OA, not the 53% target. To ensure the successful transition of RCUK funded outputs to gold open access, RCUK's policy must be properly funded, and all universities must support gold open access.

23. RCUK may wish to consider alternative ways of processing APC payments to ease administration for libraries and publishers. For example moving away from a block grant system to one of central administration would provide cost savings, and would also help track exactly how funding allocated for the payment of APCs is being used. As RCUK's policy notes, "the RCUK OA block grant is intended principally to support the payment of APCs. However, Research Organisations may use the block grant in the manner they consider will best deliver the RCUK Policy on Open Access, as long as the primary purpose to support the payment of APCs is fulfilled." We look forward to seeing feedback from UK institutions as to how their block grant money is being used to support gold open access in line with RCUK policy.
24. An alternative approach is for RCUK's policy to place added emphasis on sustainable green open access, which must include sustainable embargo periods. One way of ensuring green OA is both sustainable and effective is by working in partnership with publishers; for example, rather than money being used to develop individual repositories for green OA manuscripts, partnerships with publishers can facilitate the surfacing of accepted manuscripts on publisher sites, accessible through a repository, rather than duplicating. Such a solution has been developed in the US via [CHORUS](#) (Clearing Housed for Open Research US) and could be extended to the UK. It enables compliance with green open access policies without additional cost to the public purse by collaboration with publishers.

Compliance with the 'green' Open Access embargo periods mandated by the policy.

25. 74% of RCUK-funded authors who published with Elsevier chose to publish under the subscription model, rather than publishing via the gold route. At present it is not possible for us to determine what proportion of these 74% may have gone on to comply with RCUK policy via the green route, although we are exploring partnerships with other stakeholders to determine the best of doing this. We can say that compliance would have been possible for the majority of authors publishing with us. This is because we have shortened our green open access embargo periods for authors funded by RCUK and for the majority (99%) of our journals this embargo period is now between 12 –24 months. These new embargo lists were made available to RCUK-funded authors from 1 April 2013, the start date of the UK and of RCUK's open access policy.
26. We offer the following by way of illustration as to how compliance with green open access embargo periods mandated by RCUK policy would be possible for RCUK-funded authors publishing with Elsevier.
 - 83% of RCUK-funded articles published by Elsevier were in journals with an embargo period of 12 months
 - 11% of RCUK-funded articles published by Elsevier were in journals with an embargo of 18 months
 - 5% of RCUK-funded articles published by Elsevier were in journals with an embargo of 24 months
 - Less than 1% of our journals have an RCUK embargo period greater than 24 months

27. We would very much welcome the collection of relevant data to assess compliance with RCUK policy via the green route, in particular for those articles where compliance via the gold route was not achieved, and would suggest this might be an area for further research as we enter the second year of RCUK's policy (and therefore when a greater number of accepted manuscripts will be searchable).

The impact on particular discipline areas of the RCUK requirement for Creative Commons licensing, in particular CC-BY licences for 'gold' OA.

28. Elsevier's open access licensing policy provides choice for authors, including offering the CC-BY option for authors to choose in accordance with their funder's mandate. We inform authors that the selection of this license is a condition of their grant, but authors remain free to choose another license if they feel it is most appropriate for their work. Accordingly, of those RCUK-funded authors who published with us on a gold open access basis (26%), 60% did so with a CC-BY license and 40% chose one of the CC licenses that permit access for non-commercial research purposes only.

29. It appears that a high proportion of researchers have concerns about the application of a commercial reuse license to their work. Greater flexibility in this aspect of the RCUK policy may therefore be appropriate in order to ensure better compliance.

How effectively the policy has been communicated, including evidence or views to suggest any further engagement needed.

30. Feedback we have received from authors and institutions suggests that RCUK's communication of its policy via the RCUK website was quite difficult to follow and appeared contradictory and/or unclear in places, requiring a degree of interpretation on researcher's behalf. Publishers and academic institutions have therefore had to develop materials to support researchers. There is still a degree of confusion.

Conclusion

31. Significant steps have been taken to help authors comply with RCUK policy and this has clearly paid off, with a leap in the number of RCUK-funded authors publishing on a gold open access basis, in particular in hybrid journals. But we continue to operate in a mixed economy which, combined with the lack of funding for gold, suggests greater attention should be paid to sustainable green open access options with sensible embargo periods and leveraging of publisher infrastructure rather than duplication of effort through repositories. Our investment in the successful implementation of RCUK policy has been significant, our commitment to its successful implementation continues, and we look forward to working with RCUK to provide grant recipients with publication choices that deliver the vision set out in the Finch Review.