

STM feedback on Norway National Guidelines for Open access

The International Association of Scientific, Technical and Medial Publishers (STM) welcomes the National Guidelines for Open Access in Norway, published on 14th June. We also very much appreciate the speed with which these were translated into English to enable us to study them fully. We want to reinforce our support for the process that is underway and to share our global experience of working to successfully implement funder and government open access policies. With this in mind, we offer the following comments on the national guidelines, which we would be very happy to elaborate on and discuss in further detail.

Gold Open Access

We welcome the recommendation to establish a 'gold first' approach in Norway, similar to that adopted by the UK and the Netherlands, as the best way of supporting a transition from the current subscription model to a publishing economy based on open access. The only way in which a transition from the current subscription model can be achieved is through an alternative business model, for example gold OA. Our members are strong supporters of gold open access publishing and offer both gold and subscription publishing options to authors. One thing that is essential however to ensure a successful transition is for there to be funding available for gold. Again, we welcome the guidelines' specific reference to the fact that financing arrangements to cover the costs of open access publishing must be put in place and that publically funded institutions should contribute to the funding of open access publishing and that private and charitably funded organisations should do the same. We understand this work is to be taken forward by the Ministry of Education and Research, institutional and library management and CRIStin. Publishers are of course happy to support these discussions in any way we can.

We would note however that, contrary to what is implied at point 4, the transition to open access will not necessarily be budget neutral for all stakeholders, in particular research intensive institutions, and this must be recognised. One reason for this is identified in the recommendations: the private sector, which currently pays towards subscriptions, will now have access to the latest research, the costs of which will need to be borne almost exclusively by research-intensive institutions. Costs will likely be distributed differently in a fully gold world, which may mean they will not be budget neutral for some but actually more expensive. A fuller exploration of these issues is available here. In addition, there will be transition costs that need to be planned for. The majority (over 80%) of the world's research is published under the subscription, reader-pays model. Until such time that there is a global conversion to an author-pays gold model, countries pursuing the gold route will indeed be acting as a "forerunner" and will need to pay simultaneously to broadcast their research free to read and use by the rest of the world (gold OA) and continue to pay to receive/access research published under the reader-pays subscription model that is most prevalent globally. It is vital that the Ministry and institutions are clear as to what they are being asked to sign up to and are able to make adequate provision to cover the associated costs.

Publishers have taken a number of steps to support a transition to open access. These include:

- Launching new fully gold open access journals
- Introducing gold open access publishing options on existing subscription offerings ('hybrid')
- Reducing and varying APCs, offering discount or prepayment schemes and/or other direct financial support for gold

- Experimenting with funders, universities and libraries on offsetting arrangements to manage transition costs
- Reducing and varying embargo periods to provide green open access compliance options
- Partnering with funders and institutions to deliver open access in cost effective ways, minimising duplication of effort and leveraging existing infrastructure, such as through CHORUS in the US.

Green Open Access

The guidelines recognise that the primary publishing model currently remains as subscription. With this in mind, and until such time that a transition to a fully open access world is achieved, provisions need to be put in place to ensure journal sustainability, in particular as green open access scales. In a gold open access world, sustainability is achieved through the necessary funding for authors to pay article publication charges, but in a green open access world this means the continuation of the subscription model where this is the publication route chosen by authors or where there is no alternative business model to support a journal. Publishers use embargo periods to strike a balance between supporting authors to make versions of works freely available, but to do so in a timeframe that ensures subscription revenue that supports a journal can be recouped. If versions of articles are made available too early, the incentive to subscribe to a journal disappears, as does the journal's supporting revenue stream.

Publishers look at journal usage to set embargo periods, as usage is one important metric used by librarians to make purchasing decisions. Journal embargo periods vary, reflecting different usage patterns within disciplines. Whilst a small number of journals can and do support a 6 month embargo period, the majority do not. This means that a diversity of embargo policies is needed to reflect the practices of the scholarly community, especially in the absence of funding for universal immediate Gold OA. Many publishers are experimenting within a 12-24 month envelope, but there are wide marginal variations. Where embargo policies are set at the extremes (e.g. as is proposed in Norway with 6 months for all STM subjects and 12 months for HSS) one can anticipate that more authors will need to publish gold open access. Such considerations will of course be very important for institutions establishing or revising their own guidelines, in line with the national ones and for considerations around funding that will need to be made available for gold OA.

We also note the proposal for the creation of a national academic repository and the development of more user friendly functionality in the CRIStin system. Publishers have tools and services in place to support institutions to make accessible the best available version of research articles that a user may be entitled to view and it may be useful to explore where partnerships could lead to cost and time efficiencies.

Steering committee

Given our members' global experience of open access, we stand ready to actively participate in the steering committee that the working group recommends be created to follow up on the guidelines. We are also available to participate in any government hearings that may be set up to determine the next steps in this process.

About STM

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small companies, not for profit organizations, learned societies, traditional, primary, secondary publishers and new entrants to global publishing.