25 July 2014

Dear Mr. Madhan,

Reference: DBT-DST Open Access Policy

The Association of Learned and Professional Society Publishers (ALPSP) is the international membership trade body which works to support and represent not-for-profit organizations and institutions that publish scholarly and professional content around the world. Its membership also encompasses those that partner with, and provide services to, not-for-profit publishers. ALPSP has over 320 institutional members in 40 countries, who collectively publish over half the world’s total active journals, as well as books, databases and other products.

We welcome the opportunity to provide comment on the DBT-DST Open Access Policy.

ALPSP members are very well aware of the benefits of increasing access to research, and the majority of our members are already supporting, or working towards supporting, the open access requirements of many different governments and funders around the world.

Increased access, however, needs to be able to work for the benefit of all those who are part of the scholarly communications process. Scholarly communication involves not just those who carry out the research and prepare manuscripts for publication, it also involves those who manage the peer-review process, copyedit, typeset, print and host online, and provide dissemination and discoverability services that are so vital to ensuring content is not just available, but also that it can be found, read and reused as appropriate. Such published content also needs to be around for longer than just the current generation, so preservation initiatives also have to be considered including how to keep content accessible when technology changes. Publishers play a key role in all the activities mentioned, and all the activities mentioned need to be supported by revenue.

The draft policy prepared by the DBT and the DST does not currently take fully into account the sustainability of the businesses that not only provide services to those in receipt of grant funding, but also provide services to publishers around the world. A considerable number of such businesses are based in India and provide employment for many of its citizens. The policy, therefore, has the potential to have a significant negative effect on India’s economy. This will be explained further below.
We are pleased to support DBT and the DST in their suggestion that the Accepted Manuscript (AM) be deposited in an institutional repository, respecting publisher embargo periods. Whilst we note that the policy suggests an embargo period of not greater than one year, we would ask that this remains flexible to provide for the many different journal publication models, which support the production of the AM and repository deposit, and to reflect the different research disciplines (also known as Green OA). It has been recognized in OA policies around the world that there are differences in the appropriate embargo period for Science, Technical, Engineering and Medical (STEM) disciplines and for Arts, Humanities and Social Sciences (AHSS) disciplines, the latter being considerably longer than one year.

We remain concerned, however, with the Addendum to the Publication Agreement, as it is unclear how this relates to the OA policy. ALPSP will be unable to recommend to its members that they accept papers from DBT/DST-supported authors, if they are required to accept this Addendum.

Publishers invest significant funds in supporting the peer-review process, through management of the process itself (staff costs), as well as the online systems that make the process efficient, secure and easy for those who agree to review papers. The costs of this part of the publication process are never normally considered when the AM is recommended for deposit in an institutional or central repository. It is assumed that as the author writes the paper, and then his or her peers complete the review, that there are no other costs in the system required to produce an AM. This is clearly not the case. Publishers manage this process, to ensure that reviewers adhere to the rules around what is and what is not acceptable for publication in their respective journals. This is part of the filtering system to assist academics in deciding what to read in the current information-overloaded world.

Publishers then invest in, and take the risk in producing, the final Version of Record (VoR). This version is maintained by the publisher and forms the formal record of research. Publishers provide copyediting, proofreading, typesetting, checks on plagiarism, addition of appropriate metadata for discoverability, versioning, reference linking, online hosting, print and distribution (where appropriate) and archiving and preservation (to independent organizations). This does not take into account the additional services that publishers provide such as linking to datasets and subject repositories, online tools around the papers and content, to enhance readability, accessibility, portability and discoverability. The costs of all these processes are recovered by selling the VoR, whether via subscription, article publication charge (APC)-supported OA (also known as Gold OA), or some other income model, such as philanthropy.

There should be no requirement for the publisher to provide the VoR in PDF format within 14 days of publication. Some publishers will prefer to do this, others will not, and this is dependent on the business model that is employed for the particular journal.

India is the base for many companies, employing tens of thousands of skilled workers, who provide technical services to publishers. The Addendum has the potential to threaten the existence of these companies. If a publisher is unable to at least recoup its costs, and then have some additional investment income, the industry will stagnate and eventually collapse as it will no longer be able to serve the needs of its market. The technical support that is provided by so many citizens of India will no longer be required.

The scholarly communications process is an ecosystem that needs management to remain stable. Removing one more part of this ecosystem will irreparably damage it, to the detriment of Indian scholarship and those involved in supporting it. We do not believe this is the intention of this policy but it could very well be its effect.

We would suggest that all those involved in producing, disseminating and preserving scholarly content continue to be consulted during the development of this policy. As it currently stands, the Addendum may be unworkable for many of our members. However, we are happy to support the policy of deposit of the AM to an institutional repository, as long as flexible embargo periods are respected.

We would also ask that consideration be given to extending the policy to allow researchers to use part of their funding for Gold OA publication, whereby immediate access to the VoR is funded by an
APC. This will enable your funded researchers to publish in the OA journal(s) of their choice, will help ensure that those journals are sustainable in future, and will have an overall positive impact on scientific advancement and economic growth.

Yours sincerely,

Audrey McCulloch  
Chief Executive, The Association of Learned and Professional Society Publishers (ALPSP)  
On behalf of the Government Affairs Committee and Members