

CARL's response to the Consultation on the Draft Tri-Agency Open Access Policy

December 13th 2013



**Canadian Association
of Research Libraries**

**Association des bibliothèques
de recherche du Canada**

Who we are

The Canadian Association of Research Libraries (CARL) represents the country's twenty-nine largest university libraries. Enhancing research and higher education are at the heart of our mission. CARL promotes effective and sustainable scholarly communication, and public policy that enables broad access to scholarly information.

CARL's Comments on the Draft

CARL thanks the Social Sciences and Humanities Research Council (SSHRC) and the Natural Sciences and Engineering Research Council (NSERC) for consulting institutions, organizations and individual Canadians on the Draft Tri-Agency Open Access Policy. CARL is pleased to provide the following comments by way of a response to this consultation.

CARL commends Tri-Agency for developing a draft open access (OA) policy, an important step toward barrier-free access to the results of Tri-Agency-funded research as published in peer-reviewed journals. Open access to the results of Tri-Agency-funded research is crucial for effective knowledge mobilization based upon that research.

The appearance of the Draft Policy brings Canada's federal granting agencies into step with a growing number of funders in other countries that have established or are currently putting in place clear strategies regarding access to and dissemination of the outputs of state-funded research (*e.g.*, the Australian Research Council, Research Councils UK, the US National Institutes of Health and the European Research Council).

CARL strongly endorses the Draft Tri-Agency Open Access Policy and encourages its rapid establishment as Tri-Agency policy. While there are a number of ways in which the Draft Policy might be strengthened (as noted below), CARL believes that the Draft Policy should be adopted by Tri-Agency even as presented since it is already a policy that will result in significantly greater OA and should present few compliance difficulties for researchers.

CARL is pleased that researchers may comply with the Draft Policy either through self-archiving in OA repositories their articles published in non-OA journals (Option #1: "green OA") or through publishing their articles in OA journals (Option #2: "gold OA"). The freedom under the policy to use either option means that:

- The policy is consistent with academic freedom in preserving the author's right to choose in which journals (subscription-access or OA) to publish.
- The policy allows market forces to operate in that authors are not forced to choose a potentially expensive open access journal option since the self-archiving option is almost always available and it is free.
- Although authors are given the option of using grant funding to cover the cost of publishing in open access journals, they can choose to devote that funding to their research instead and simply self-archive.

CARL commends the Tri-Agency for including on the webpages of the consultation and the Draft Policy a clear explanation of the Draft Policy and the reasons for developing it. The FAQ is excellent and should be very helpful for researchers considering how best to comply with the policy.

Inasmuch as most institution-based OA repositories are managed by the university libraries, we would like to anticipate a potential objection from some researchers or institutions that do not currently have a local institutional repository to which copies of articles may be submitted. We would note that, to this point, eight university libraries across the country will be welcoming articles from researchers in their province or region whose home institution does not currently maintain an institutional repository. At present, these “adoptive” repositories include those of the University of Victoria, Simon Fraser University, the University of Alberta, the University of Calgary, the University of Manitoba, the University of Toronto, McGill University and Dalhousie University. The repositories at the University of Alberta, the University of Calgary and the University of Toronto will, in fact, accept articles from any researcher in Canada requiring this service.

While we believe that it is important to move forward with the Draft Policy even as presented, if there were the opportunity to strengthen it in certain ways whether in time for its announcement as policy or at some point in the future after the establishment of the policy, we would recommend the following changes:

- Option #1 (the OA publishing or gold OA option) might require that grant recipients retain the right to archive publications elsewhere in addition to a publisher’s website – an institutional or disciplinary repository.
- Option #2 (the OA self-archiving or green OA option) might include a strong encouragement that grant recipients deposit a post-review copy of their article *upon acceptance* in an OA repository. The software on which repositories run can be set to work automatically with a publisher’s embargo. The institution would, in this case, have the article metadata and the existence of the article would be known to potential readers as early as possible.
- The maximum embargo period might be reduced to six months to be in keeping with other policies internationally that may include a maximum delay of six months.
- A requirement might be included such that copies deposited in accordance with the policy be in a format accessible to readers with print disabilities.

CARL will be pleased to work with Tri-Agency in the establishment of its OA policy. CARL member libraries, for their part, look forward to collaborating with institutional research offices to support and enable researchers to make their research freely available to readers around the world through OA. The Internet provides a great opportunity to transform approaches to scholarly research and publication. Public access to the results of publicly funded research is a public good in itself and maximizes the impact of that research.

Canadian Association of Research Libraries

Tel. 613.482.9344 203-309 Cooper St.

info@carl-abrc.ca Ottawa, ON

www.carl-abrc.ca K2P 0G5

