

CARL Comments on the Tri-Agency Open Access Policy on Publications

March 31, 2025

On February 25, the Tri-Agencies published the draft [Open Access Policy on Publications](#) inviting community input. CARL would like to thank the Tri-Agencies for the opportunity to comment on the draft policy.

CARL strongly endorses the direction of the draft policy as it presents a low-cost approach that maintains flexibility for authors allowing them to publish where they want, while ensuring that publicly-funded research will be freely available to all Canadians through a trusted network of Canadian repositories. It also recognizes the long-standing and important role of libraries in the stewardship of research knowledge and leverages existing library infrastructures and staff expertise that have been developed over the last two decades.

The draft policy represents a positive step towards a more open and equitable ecosystem for scholarly communications in Canada.

International Alignment

Funders around the world have been moving to adopt open access policies over the last several years and the vast majority of researchers in Europe, the United Kingdom and the United States (and their international and Canadian co-authors) are now subject to immediate open access policies that are similar or equivalent to this new Tri-Agency policy. As such, this policy will bring Canada in line with a number of other regions including the European Commission - Horizon Europe¹, the National Science Foundation², Coalition S funders³ and other US agencies. The Tri-Agency policy also aligns with the Fonds de recherche du Québec [FRQ] revised policy (as a

¹ [See pg. 104](#) "at the latest at the time of publication, a machine-readable electronic copy of the published version or the final peer-reviewed manuscript accepted for publication, is deposited in a trusted repository for scientific publications"

² [See pg. 10](#) "NSF will ensure that all peer-reviewed scholarly publications resulting from agency-funded research are made freely available and publicly accessible by default in NSF-PAR without any embargo or delay"

³ [Plan S](#) "Plan S aims for full and immediate Open Access to [peer-reviewed](#) scholarly publications from research funded by public and private grants. cOAlition S"

member of Coalition S), which requires immediate access and the use of open licenses.

Stewardship of the National Scholarly Record

Requiring all articles to be deposited into a university repository provides maximum resilience because there will be a shared responsibility for stewardship across the university library network, with no single point of failure (due to funding cuts or other issues). In addition, the policy will ensure that Tri-Agency funded content will be managed and curated in Canada and available to all Canadians now and into the future.

Relationship with Diamond Open Access

CARL strongly endorses the Diamond OA model for scholarly publishing (journals that are free for authors and readers), which is already the predominant model used by Canadian humanities and social sciences journals. Diamond OA journals are frequently managed and governed by the scholarly community itself, aligning more closely with academic and research priorities rather than commercial interests.

In Canada, there have already been significant investments in the Diamond OA ecosystem (Coalition Publica and Érudit) by CFI, SSHRC, FRQ and the libraries (directly or via CRKN). It is important that, even with a policy requiring repository deposit, we maintain and expand our collective investments in Canadian publishing infrastructure to ensure that Canadian researchers have high quality Diamond OA publishing venues available to them, and have the option to publish on locally relevant topics in their language of choice. As such, we suggest that in the preamble to the policy, the Tri-Agencies make a strong statement of support for Diamond OA as a preferred model of publishing and encourage researchers to seek out these types of journals if they are available in their field.

Given the shared membership, objectives, and values across the two communities, CARL believes that Canadian libraries can work with Coalition Publica (and possibly others in Canada) to develop mechanisms that allow authors to more easily comply with the Tri-Agency policy when they are publishing in a Canadian journal, and whereby users can be directed to view the original published version of an article.

Comments on Specific Policy Components

Requirement to deposit into a Canadian institutional repository

The new policy will require all grant recipients to deposit their grant-funded peer-reviewed articles into a Canadian institutional repository under an open license (e.g. CC license or equivalent) for immediate open access at the time of publication, even when the article is freely available on the publisher's website.

CARL strongly supports this aspect of the policy. Although there are two possible paths towards open access (publishing in an open access journal or depositing an article in a repository), restricting the requirement for researchers to deposit into a Canadian repository will mean compliance is standardized for all articles and will become relatively straightforward - ultimately leading to higher rates of compliance.

The Canadian repository network is well developed and is able to support these requirements. Canada has been working for the last several years to build a strong network of over 60 institutional repositories that collaborate on the adoption of standards and good practices. In addition, a hosted platform for institutional repositories has recently been launched by Scholars Portal ([Scholaris](#)), strengthening the repository network through cost-sharing, increased standardization, and economies of scale. Through this network of repositories, the vast majority of Tri-Agency grant recipients have access to a local repository in which they can deposit their articles. Only a very small portion of Tri-Agency funded researchers will not have an affiliated institutional repository, and, to address this gap, we are developing solutions that will allow these researchers to deposit into an adoptive or generalist repository in Canada.

Because there will be a fixed number of repositories, the deposit process can be streamlined to make it as seamless as possible for researchers. To illustrate how the policy could be implemented, CARL has prepared an example of the workflow for policy compliance ([See the workflow here](#)). The workflow demonstrates just one possible way in which the policy could be carried out.

There are also a variety of different tools and mechanisms that can be pursued to ease the policy compliance process. As the scholarly ecosystem becomes increasingly interconnected, this brings many opportunities to build in efficiencies related to deposit of metadata and manuscripts. Integration with ORCID, DOIs and other persistent identifier infrastructures, for example, can lead to automated exchange of metadata across systems (and into repository platforms). We also

anticipate being able to negotiate with some publishers to implement direct deposit of manuscripts and metadata into Canadian repositories.

Open License Requirement

The draft policy requires that articles be deposited using an open license. CARL recommends that the Tri-Agencies strengthen the wording to require the use of Creative Commons licenses as they are already widely known and used for scholarly manuscripts. This would simplify options for researchers. And, while Creative Commons licenses offer a range of licenses to choose from which vary from less to more restrictive in terms of reuse permissions, we also suggest that the Tri-Agencies encourage the use of the less restrictive licences such as CC-BY where possible because this allows content to be reused in the context of other value added services such as text and data mining, artificial intelligence, and translation into other languages.

Rights Retention Strategy

The policy states that, “By accepting the Terms and Conditions of their grant or award, grantees and chairholders must retain rights over the dissemination of any peer-reviewed research article arising from agency-funded research” and “Researchers are asked to inform the publisher and/or journal of their obligations and rights under the *Tri-Agency Open Access Policy on Publications* when submitting their article for publication.”

CARL believes that this rights retention language is critical for the success of the policy as it will empower authors in their communications with publishers. As has been done by funding agencies with rights retention strategies in other countries, the Tri-Agencies should further bolster the authors’ requests to retain rights by informing the publishers directly about this new provision.

We further recommend that authors be guided to retain the rights at minimum for the “Author Accepted Manuscript” version of the article as this approach is more consistent with journals’ pre-existing open access policies.

As libraries have been working directly with researchers on these issues to support compliance with the current policy, we are keenly aware that most researchers do not currently have a strong understanding of rights issues. Therefore very clear and straightforward language related to the rights retention strategy will be essential for ensuring that researchers are able to apply it effectively.

In addition, some activities targeted at raising awareness would be very beneficial. CARL and the academic library community have an extensive network and significant expertise in this area and are happy to assist with the development of rights retention language and contribute to a Tri-Agency-led researcher education campaign. This could be a very good opportunity to help the research community become more conversant about these issues.

Preprints

The policy states that “In cases where authors are prohibited by the journal and/or publisher from depositing the VoR or AAM in a repository at the time of publication, preprints deposited under an open license will be accepted as compliant with this policy.” We understand that the Tri-Agencies are trying to ensure that all researchers can comply with the policy; however, to some degree, this undermines the strength of the rights retention strategy. We assume, therefore, that this will only happen in very few cases.

Because many preprints will have already undergone some type of peer review, we also suggest that the Tri-Agency revise their definition of a preprint to reflect this reality, to something similar to: “A version of a research manuscript that is deposited into a secure, persistent, and freely available online archive (i.e. a repository or a preprint server) before it has been peer-reviewed for a journal.”

We further suggest that adopting some standardized metadata tagging to indicate the version type of the manuscript in the repository could be helpful. We note that this is a rapidly evolving aspect of the ecosystem right now as the publish, review, curate model of publishing becomes more prevalent.

While we support preprint sharing of non-peer reviewed manuscripts because it makes research available quickly, a preprint is not equivalent to an article that has been vetted and reviewed. Peer review is essential for ensuring quality of the scholarly record and maintaining trust in the system.

Other Considerations

Costs

It is CARL's position that the ultimate responsibility for complying with the policy must fall to the authors, not the libraries. However, our experience from the research data management policy is that an effective policy requires resourcing to be appropriately allocated to enact the policy on campus and to assure the

engagement of various groups on campus including research offices and administration, libraries, and researchers.

It is important to emphasize that the overall costs of implementing this policy are significantly lower than if the policy would have been less prescriptive about repository deposit. With annual article processing charges (APCs) for open access publishing increasing dramatically⁴, a more neutral approach would likely default to a much higher number of APC payments, a scenario that is extremely costly and not sustainable.

For the researcher, it is estimated that their time to execute the deposit process will be 10-15 minutes per article. The deposit process is already relatively straightforward and is supported by repository staff, certain types of automation, and increasing standardization. CARL, Scholars Portal, and the library community will continue to work with the Tri-Agencies to ensure deposit workflows are as seamless as possible.

There are a number of options for reducing the burden of the policy requirements for both libraries and researchers. These include streamlining the deposit process so that it becomes more efficient, negotiating with friendly publishers the direct deposit of open access versions of manuscripts, and ingesting article metadata from other sources.

In all of these areas, an ORCID for each researcher could be extremely helpful in terms of automated metadata exchange and we urge the Tri-Agencies to strongly encourage their adoption, including requesting and utilizing ORCIDs in their Convergence platform and new Tri-agency Grants Management Solution (TGMS). With these types of tools available, we expect that the per article costs for deposit will decrease over time as researchers and libraries develop more systematic workflows.

That said, the policy will increase the volume of manuscripts being deposited into each repository and will therefore increase the costs of running the service. We consider this to be an ancillary cost of research that should be recognized and compensated by increased funding directed towards library repositories and related services. We predict that deposits will grow by about 8,000 articles for the largest institutions to 500 or fewer for smaller universities. Based on typical workflows provided by several institutions - and taking into consideration a strong rights retention strategy, clear policy language, and supporting Tri-Agency guidance - the

⁴ A recent analysis published by Stefanie Haustein, et. al found that between 2019-2023, annual spending almost tripled from \$910.3 million to \$2.538 billion, and average APC costs increased significantly: <https://arxiv.org/abs/2407.16551>

estimated amount of time for a library to process a deposited article is between 15-30 minutes. Therefore, we anticipate the increase in staffing required to support this policy will range from .25 FTE - 1.5 FTE per library depending on the size of the institution. (This estimate does not include the initial step, which is the researcher's time to upload the document with a submission form, mentioned above.)

Compliance

We believe that compliance rates for the policy will be highly dependent on whether the Tri-Agencies will monitor the policy closely, and explicitly state specific consequences for non-compliance. We are very aware that compliance rates are consistently low for policies that are not monitored and enforced (as is the case with the current Tri-Agency policy) and we are concerned that the policy will be disregarded if there is not strict follow-up by the Tri-Agencies.

Because all funded articles will be held in the Canadian repository network, discovery and tracking of articles will be relatively straightforward. If articles in the repository are accompanied by DOIs and metadata that include the funder name and funding reference number (along with standard metadata elements like authors, title, and date), then a basic search mechanism across the repositories will be able to identify all articles funded by each agency. Therefore, the metadata required for tracking articles should also be part of the Tri-Agency policy (or guidance), as already mentioned.

The Tri-Agencies can help to improve compliance levels by ensuring policy and guidance language is clear and unambiguous, by adopting ORCIDs to facilitate metadata exchange between systems, and through offering a single deposit interface for researchers.

Given that we do not currently have a comprehensive picture of Canadian publication output, this policy will be a huge step forward in terms of our ability to understand the nature of Canada's research footprint, and will allow for much more extensive analyses of the outcomes and impact of Tri-Agency funded research.

Additional comments

While this policy is focused on scholarly journal articles, we recommend the Tri-Agencies consider expanding the policy in the future to include other types of research outputs including monographs, research data sets and code.

We further suggest that accompanying guidance could encourage where possible the deposit of accessible versions (suitable for use with screen readers) in order to support users with print disabilities. However, we recognize that this is a challenge that cannot be resolved comprehensively through this policy.

Conclusion

As the voice of Canada's research libraries, CARL has a strong interest in advancing sustainable and equitable approaches to open access. The draft policy presents a realistic path forward that allows researchers to retain maximum freedom, while also recognizing the important stewardship role of the university library community. CARL would be pleased to continue to work with the Tri-Agencies to ensure all researchers can comply with the forthcoming policy and to help put the systems and processes in place that are needed to ensure the policy is successful.