



Consultation Questions (Abridged)

Section A: Research Articles

Q24. Regarding UKRI's consideration about restricting the use of its OA funds for publication in hybrid journals (see paragraph 80 of the consultation document), please select the statement that best reflects your views:

- a. UKRI OA funds should not be permitted to support OA publication in hybrid journals
- b. UKRI OA funds should only be permitted to support OA publication in hybrid journals where they are party to a transformative agreement or similar arrangement
- c. UKRI OA funds should be permitted to support OA publication in hybrid journals
- d. None of the above
- e. Don't know
- f. No opinion

Please explain and, where possible, evidence your answer (2,650 characters maximum, approximately 400 words).

The Association of University Presses issued its first statement in support of sustainable Open Access in 2007. Since that time, the Association and many of its 150+ members around the world have engaged in a broad range of experiments and collaborations to sustainably increase access to high-quality, short- and long-form scholarship (more about our long-form OA work in answer to Q35 and beyond below). Our community of mission-driven publishers has developed a variety of appropriate solutions for their specific circumstances, including University of California Press's Collabra platform as well as hybrid and fully OA strategies, so we encourage UKRI to recognize diverse methods for delivering short-form OA content and to allow funding for hybrid OA journals. A blanket prohibition on hybrid journals is likely to make it more difficult to achieve a transition to OA in a number of AHSS disciplines.

By recognizing the place of hybrid journals in the OA spectrum and by not privileging transformative agreements in its funding decisions (see answer to Q28), UKRI will allow scholars the full flexibility and freedom to choose publishers based on what is best for their scholarship, their careers, and their disciplines, regardless of geography or press size.



Q28. As discussed in paragraph 74 of the consultation document, transformative agreements are one way of moving to OA in a more cost-effective way. **Are there approaches to managing transformative agreements or other mechanisms and developments that UKRI should consider to help manage the transition to OA in a way that is cost-effective and offers public value to the UK?** Yes / No / Don't know / No opinion.

Please expand (2,650 characters maximum, approximately 400 words).

Yes. As a representative scholarly publishing body, seeking to further the interests of presses in 16 countries on six continents—including Bristol, Cambridge, Liverpool, Manchester, Oxford, and UCL in the UK—which are disproportionately important in contributing to the intellectual advancement of their disciplines and sub-disciplines, AUPresses encourages UKRI to support publishing bibliodiversity in its funding choices with regard to transformative agreements. Many among our membership support a subscribe-to-open model in journals; perhaps more importantly, a diversity of funding models are emerging to underwrite short-form OA publishing in the less-funded AHSS disciplines; smaller non-profit publishers need a variety of tools in their toolbox to help manage pathways to open scholarship. We urge UKRI to avoid consolidation of funding to large commercial publishers who are engaged in transformative agreements.

By recognizing the place of hybrid journals in the OA spectrum (see answer to Q24), by supporting further exploration of funding models, and in particular by not privileging transformative agreements—which tend to favour large commercial publishers—in its funding decisions, UKRI will allow scholars the full flexibility and freedom to choose publishers, based on what is best for their scholarship, their careers, and their disciplines, regardless of geography or press size.



Section B: Monographs, Book Chapters and Edited Collections

Q35. To what extent do you agree or disagree that UKRI's OA policy should include an exception for in-scope monographs, book chapters and edited collections where the only suitable publisher in the field does not have an OA programme? Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

Please explain and, where possible, evidence your view (1,350 characters maximum, approximately 200 words).

Strongly agree. As described above, AUPresses issued its first statement in support of sustainable Open Access in 2007. Since that time, the Association and many of our 150+ members have engaged in a broad range of experiments and collaborations to sustainably increase access to high-quality scholarship. Specifically, individual member presses have launched well over a dozen projects funded by the Andrew W. Mellon Foundation to create an infrastructure to support open digital publishing. Our community has developed a number of OA platforms, including Luminos, Manifold, and Project MUSE Open Access. With our colleagues at the Association of American Universities and the Association of Research Libraries, we created the TOME project to promote institutional funding of OA monographs <https://www.openmonographs.org/>. A survey, undertaken by our inaugural Open Access Task Force in late 2019, indicates that 63 of 103 respondents published some OA book material and 53 had published frontlist "born OA" content.

In addition to that rich vein of activity, however, AUPresses is mindful that not all university presses currently publish long-form works OA. Therefore, we support any exception that preserves the scholar's freedom to choose, supports diversity in the publishing ecosystem, and doesn't concentrate eligibility among fewer publishers. Further, we would endorse that it's a scholar's responsibility to evaluate and designate a publisher suitable to their discipline and type of work.

Q37. Regarding monographs in-scope of UKRI's proposed OA policy, which statement best reflects your view on the maximum embargo requirement of 12 months?

- a. 12 months is appropriate
- b. A longer embargo period should be allowed
- c. A shorter embargo period should be required



d. Different maximum embargo periods should be required for different discipline areas

e. Don't know

f. No opinion

Please explain and, where possible, evidence your answer. If you answered b, c or d please also state what you consider to be (an) appropriate embargo period(s) (1,350 characters maximum, approximately 200 words).

Setting an embargo period for OA monographs at this early juncture puts the cart before the horse. Until sustainable business models evolve, it's impossible to assess the impact of an embargo of any length; indeed, models may evolve for which NO embargo period is needed. Again, one-size-fits-all solutions are not helpful to an evolving ecosystem.

While we cannot know how the pandemic will impact monograph distribution and use, it's reasonable to expect library acquisition behaviours and user preferences to change. 2019 UUK research indicates 70% of monograph sales occur in the first 2 years, but new financial constraints and increased reliance on remote access will drive awareness and use of OA monographs. Changing institutional and individual behaviours require new assessment.

In addition, AUPresses' 2019 survey of operating statistics indicates backlist sales are crucial to university presses' financial health, accounting for an average of 68% of sales. While this may change in light of new realities, the impact of OA decisions must be understood to extend beyond the months of cost recovery in a frontlist title's life. Our member presses seek to incorporate OA in a way that doesn't undermine the bases of mission-driven publishing.

AUPresses stands ready to assist in assessing new behaviours, retesting observations from over a decade of OA experimentation, and, most importantly, developing new business models that recognize institutions', scholars', and publishers' stakes in the sustainable production of high-quality OA monographs.

Q41. To what extent do you agree that self-archiving the post-peer-review author's accepted manuscript should meet the policy requirement? Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

Please explain and your view (1,350 characters maximum, approximately 200 words).

Strongly disagree. The accepted manuscript, even post-peer-review, does not constitute the "version of record" for a monograph and as such does not merit self-archiving. Publishers are not merely printers; their editorial professionals add value to every manuscript by working with scholars to iteratively engage the



comments of peer reviewers as well as to refine the manuscript, while their design, production, and marketing professionals enhance the readability and discoverability of the content, whether in print or electronic form. This added value from scholarly publishers, especially university presses, is precisely what determines the “version of record” for a monograph. The work usually done on after a monograph author’s manuscript has been accepted is comparatively far more involved than the work done on the accepted manuscript of a journal article.

Q43. To what extent do you agree or disagree with CC BY-ND being the minimum licencing requirement for monographs, book chapters and edited collections in-scope of UKRI’s proposed OA policy? Strongly agree / Agree / Neither agree nor disagree / Disagree / Don’t know / No opinion.

Please explain and, where possible, evidence your view (1,350 characters maximum, approximately 200 words).

Disagree: AUPresses encourages UKRI to offer greater flexibility and a more liberal standard when establishing minimum licensing requirements, especially with regard to long-form AHSS works. One size -- even a good one like CC BY-ND, which may be adequate to the needs of STEM scholars and publishing -- doesn’t fit all needs. Across-the-board porting of the rubric that has evolved for one circumstance is likely to be inappropriate for others. CC BY-NC-ND licenses are preferable to many in our community of authors and publishers, particularly among AHSS scholars whose scholarly output is an idea, not a dataset; those ideas and primary sources (such as interviews) deserve a modicum of protection from misrepresentation or exploitation for profit without explicit consent. For mission-driven publishers such as our members, the idea that commercial presses can profit by reuse of their content is antithetical to mission, diverting revenue that could have been reinvested in the publication of additional scholarship. Some in our community have even argued that the original publisher might be legally liable if content is misused by a third party. CC BY-NC-ND would afford additional protection to scholars and publishers while OA infrastructure and standards evolve.

Q44. To what extent do you agree or disagree that UKRI’s OA policy should include an exception for in-scope monographs, book chapters and edited collections requiring significant reuse of third-party materials? Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don’t know / No opinion.

Please explain your view (1,350 characters maximum, approximately 200 words).
Questions 45-46 concern how ‘significant reuse’ may be defined.



Strongly agree. We appreciate UKRI's intention to offer this exception as well as its particular singling-out of exhibition catalogs as an example, as these are published by a small but significant subset of our members. Winner of the 2020 R. R. Hawkins Prize from the Association of American Publishers, Yale University Press's *Leonardo Da Vinci Rediscovered*, with 1,500 illustrations in 4 volumes, is another exemplar of capstone AHSS work, based on significant reuse of third-party materials.

Q45. To what extent do you agree or disagree that if an image (or other material) were not available for reuse and no other image were suitable, it would be appropriate to redact the image (or material), with a short description and a link to the original? Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

Please explain your view (1,350 characters maximum, approximately 200 words).

Don't know. If an image or third-party material is central to the scholar's argument, UKRI's policy should allow flexibility (perhaps even OA-exempt status for the work), as redaction may not produce the best result. For scholars, redaction may countermand the original intention to base sustained argument and exploration on a licensed image or material; moreover, the material to be redacted simply may not have an available link. For publishers, the redaction workaround would likely represent an additional hurdle, and more importantly, an additionally mandated and uncompensated cost to OA manuscript preparation.

Q46. Do you have a view on how UKRI should define 'significant use of third-party materials' if it includes a relevant exception in its policy? Yes / No / Don't know / No opinion.

If yes, please expand (2,000 characters maximum, approximately 300 words).

Yes. Decisions regarding significant use will likely require case-by-case evaluation, so flexibility will be imperative. "Significance" may be measured quantitatively but, particularly in AHSS work, will have important qualitative considerations springing from the scholar's intention and goals.

Q50. Regarding the timing of implementation of UKRI's OA policy for monographs, book chapters and edited collections, which statement best reflects your view?

- a. The policy should apply from 1 January 2024
- b. The policy should apply earlier than 1 January 2024
- c. The policy should apply later than 1 January 2024**
- d. Don't know



e. No opinion

Please explain and, where possible, evidence your answer. If you selected b or c, please also state what you consider to be a feasible implementation date (2,000 characters maximum, approximately 300 words).

In light of the current economic upheaval caused by the coronavirus pandemic, we encourage an effective later than 1 January 2024. In light of the financial strain caused by COVID-19 on every part of higher education, it is essential that UKRI allow maximum time for transition, which surely points to implementation after the REF 2027/28 census.

Q53. Do you have any views regarding funding levels, mechanisms and eligible costs to inform UKRI's considerations about the provision of funding for OA monographs, book chapters and edited collections in-scope of its proposed policy? Yes / No.

If yes, please expand (2,650 characters maximum, approximately 400 words).

Yes. Publishing never has been, and never can be, a cost-free proposition. The most comprehensive and rigorous recent study of the cost of a monograph was undertaken by ITHAKA in 2016 https://sr.ithaka.org/wp-content/uploads/2016/02/SR_Report_Costs_Publishing_Monographs020516.pdf. It found that the average cost of a monograph was approximately \$28,000. Roughly 60% of those costs derive from editorial and marketing activities, processes that add scholarly rigor and discoverability to the content, which are highly valued by scholars, which help shape emerging disciplines, and which are for the foreseeable future impossible to scale through automation. Assuming that there are even material efficiencies to be achieved in the remaining 40% of costs, that still leaves total cost in excess of \$22,000 (more than £18,000). In any sustainable OA proposition, the value-adding labor of publishing must be recognized and its irreducible costs must be covered.

Unless UKRI will be able to fund BPCs commensurate with this entire demonstrated need, and unless these costs can be recouped in the marketplace, it will fall to universities to increase expenditures—to individual faculty members and/or their presses—to make up the difference. This appears highly unlikely in a challenging new economic landscape. In fact, even before the pandemic there has been evidence of a lag in willingness to increase institutional financial support: our TOME pilot project—<https://www.openmonographs.org/>, referenced above in Q35—began 3 years ago, yet to date, only 17 universities have committed to support OA monograph projects by agreeing to offer publishing



grants to their faculty. At the same time, it should be noted that more than 60 university presses have agreed to produce such works.

The magnitude of the threat to a diverse, international scholarly ecosystem of systematic, long-term underfunding should not be underestimated: the combination of inadequate funding and strict limits on the use of sales to recover costs will lead to consolidation in scholarly publishing, an over-reliance on commercial publishers, inferior publications, and reduced opportunities for research impact.



Section D: Policy Implications and Supporting Actions

Q61. Do you foresee UKRI's proposed OA policy causing and/or contributing to any disadvantages or inequalities? Yes / No / Don't know / No opinion.

If yes, please expand, referencing specific policy elements and including any comments on how UKRI could address any issues identified (2,650 characters maximum, approximately 400 words).

Yes. The rapid shift in publishing being brought about by Open Access has the potential to create new winners and losers (indeed in some cases it already has begun to do that), and in our view that is an outcome to be guarded against. OA STEM requirements in Europe are accelerating a trend toward consolidation in scholarly publishing—never conducive to a healthy ecosystem. For example, the American Society of Clinical Oncology recently announced that it will be moving its portfolio of previously self-published journals to a multinational commercial academic publisher.

<https://wolterskluwer.com/company/newsroom/news/2020/5/journal-publisher-asco-oncology-society.html> But damage to the publishing ecosystem is not the only risk to be avoided. The shift to a financial model that relies primarily on some form of Author or Book Processing Charge already preferences scholars with access to funding, leading to results that directly contradict the academy's values – marginalizing independent scholars, scholarship from the Global South, and scholars from underfunded institutions. Finally, it must be noted that unequal access to digital infrastructure similarly threatens to limit the success of any effort to increase readers' access to scholarship. Any expansion of the current requirements must be careful to avoid exacerbating these inequalities.