

REF 2029 Open Access Policy consultation submitted June 7, 2024

NB. Form did not accept links, so added urls during the submission process.

Your details

Question 1

Are you answering on behalf of your organisation, institution or as an individual?

Organisation

Question 2

What is your organisation/institution?

Association of University Presses

Question 3

Country: England/Scotland/Northern Ireland/Wales/Other (Please state)

Other – global constituency, including member presses in England and Scotland and publishing scholarly authors impacted by REF policy

Section A: open access developments in the sector

Question 4

What are the most important changes in the open access landscape since the development of the REF 2021 open access policy,

1) how do these differ across disciplinary areas

2) what are the implications of these changes for the REF 2029 open access policy?

The most significant developments have been:

- The implementation of the UKRI OA policy, which was developed after consultation with the sector. Although it does not provide for the different potential lengths and complexities of the great variety of books, or allow for inflation, it does set a precedent for a funded policy model to support OA for longform outputs.

- The failure of many transformative OA journals agreements to be genuinely transformative (as observed by Plan S, JISC and many librarians), with the notable exception of the [Subscribe to Open model](#).
- The growth of institutional rights retention policies which could have a significant bearing on research dissemination, specifically the risk of a CC-BY licence removing various author rights and protections if OA content is ingested by AI LLMs, and the risk IRRPs present to the sustainability of book publishing.
- The first signs of a mature, sustainable model for OA books via various collective subscription initiatives involving a range of university presses including those at [Central European](#), [Liverpool](#), [Michigan](#) and [MIT](#), alongside more than 40 university presses collaborating with JSTOR on its '[Path to Open](#)' to publish 300 OA monographs each year, the [Cambridge University Press 'Flip It Open'](#) model and a range of offerings from smaller new university presses. In each case, the models require university libraries to think about repurposing existing collections budgets to support a move away from the default gated access model. They are proof that money is in the system to support longform OA for REF provided institutions are incentivised to invest.
- The publication of a coherent and viable [proposal for Version of Record OA for books using a fraction of a percent of QR funding](#).
- With 17 UK humanities departments under threat at the time of writing, and unprecedented pressures on the disciplines that drive critical thinking, justice, democracy and our understanding of value, it is imperative that REF does not facilitate the unintended consequence of an immediate, polished gold OA for STEM and an embargoed, inferior, 24 months late OA for the flagship book format for humanities research.
- Recent developments and concerns are sketched out further in [this article from AUPresses](#).

Section B: journal articles and conference proceedings

Question 5

Should deposit requirements post acceptance be maintained where publication isn't immediately open access?

- yes/no/not sure/no comment
- if yes, why? What would be an appropriate time limit for deposit post acceptance?
- AUPresses agrees with the four UK higher education bodies that the requirement to deposit outputs that were not immediately OA created an unnecessary burden on HEIs. Deposit should move from acceptance to publication and, of course, for in-scope outputs only.

Question 6

Do you agree with alignment to the UKRI open access policy in respect of licensing for journal publications by requiring licensing terms equivalent to CC-BY or CC-BY-ND licensing for journal publications?

- yes/no/not sure/no comment
- what, if any, negative or positive impacts might there be from this change?
 - The removal of 'NC' risks a number of unforeseen consequences. It would be naive to remove 'non-commercial' protection from narrative-based humanities research at a moment when the full potential of generative AI is still being explored. Humanities research is the cornerstone of mission-based, non-profit university press publishing which could in turn be exploited by for-profit entities in the absence of NC. This risks a delicately balanced publishing ecosystem and also risks undermining authors' rights.
 - So much of humanities research relies on close reading and textual analysis, which in turn require the negotiation of complex third-party permissions. A CC-BY licence risks excluding disciplines such as Literary Studies and Art History from REF compliance due to the fabric of research in those fields.

Question 7

Do you agree with recognition of alternative platforms as meeting open access requirements as primary platform for publication?

- yes/no/not sure/no comment
- please provide any further comment

This needs clearer definition. If it refers to for-profit platforms such as Academic.edu or Researchgate, then pre-prints are the only outputs that could be equitably shared. The use of an AAM would not recognise publisher labour or investment.

Question 8

Do you agree with the proposed changes to embargo periods for journal publications for main panels A and B (12 months reduced to six months) and main panels C and D (24 months reduced to 12 months) in light of changing standards and practice?

- yes/no/not sure/no comment
- what, if any, negative or positive impacts might there be from this change?
 - Research England offers no supporting research on the impact of reduced embargoes on the sustainability of journals publishing. According to the British Academy, the citation half-life for a humanities journal is 48 months. REF 2021 already halved that, a

further reduction risks undermining the viability of the long tail of humanities journals publishing.

- The proposal refers to this development being 'in light of changing standards and practice' but does not specify what those are. If the phrase refers to transformative deals, it has been noted by Plan S and JISC that these have been largely unsuccessful. If it refers to institutional rights retention, then it is relying on a policy that risks disintermediating publishers and the collapse of the journals model.

Question 9 (*questions 9 and 10 were inverted on the form*)

Do you consider that tolerance limit for articles and conference proceedings should be retained at 5% of any submission?

- yes/no/not sure/no comment
- please provide any further comment

Question 10

Do you agree that changes to the open access policy for journal-based publications should be implemented from 1 January 2025?

- yes/**no**/not sure/no comment
- please provide any further comment
- The policy consultation closes in June 2024 and the policy is unlikely to be confirmed until at least the end of 2024, by which point many journals will already have articles in progress for publication in 2025. It seems prudent to allow a longer lead time in order to ensure clarity in the transition.

Question 11

Do you agree with the proposed exceptions for journal publications?

Add comment re. List of exceptions.

- yes/no/not sure/no comment
- should any of the above be removed?
- What, if any, additional exceptions might be required?

Section C: longform outputs (monographs, book chapters and edited collections)

Question 12

Do you agree that there should be no deposit requirement for longform publications, but that they should be made immediately available as open access upon publication (or no later than 24 months following publication if subject to an embargo)?

- yes/no/not sure/no comment
- please provide any further comment
- AUPresses is concerned that RE has put forward a proposal without any research on the impact of a 24 month embargo on the sustainability of monograph purchasing.
- Unlike the funded UKRI model, the REF proposal risks a two tier approach in which journals-based STEM is immediately OA but the humanities, the disciplines of the book, are OA in an inferior version two years after publication.
- The use of the AAM prior to copy-editing discriminates against those authors for whom English is not a first language and those with dyslexia. It also risks failure of compliance with the European Accessibility Act.
- The proposed use of an AAM fails to reflect the considerable publisher investment and input into the early stages of a book as opposed to a journal article. This might include the idea coming from the publisher, multiple rounds of editorial development, multiple rounds of paid peer review and revision, the engagement of a central editorial board, negotiation of contract, support with third party permissions. Peer reviewed publication means the verification of quality by an independent body (the publisher). The AAM is the result of a working partnership between author and publisher.
- Our authors are overwhelmingly opposed to the use of the AAM for OA, regarding it as an inferior version of their work and potentially problematic for trackable citation.
- Whereas robust mechanisms exist for perpetual access to published material, there has been no risk assessment for digital preservation via repositories for green OA.
- If a VoR OA book is desirable then RE has an obvious mechanism for compliance: just 0.66% of current QR funding would support gold OA for longform outputs in the next REF if submission levels are comparable with REF2021. More [here](#).

Shortened response to fit 1,500 character limit:

- *We are concerned that RE has made proposal without research on impact of a 24 month embargo on monograph purchasing sustainability.*
- *Unlike funded UKRI model, REF proposal risks a 2-tier approach: journals-based STEM immediately OA but longform humanities OA in inferior versions 2 years after publication.*

- *Use of AAM prior to copyediting discriminates against authors for whom English is not a first language & with dyslexia. Also risks failure of compliance with European Accessibility Act.*
- *Use of AAM fails to reflect considerable publisher investment & input in book's early stages-which might include the idea coming from the publisher, rounds of editorial development, rounds of paid peer review & revision, central editorial board engagement, contract negotiation, support with 3rd party permissions. Peer reviewed publication means quality verification by an independent body (the publisher). AAM is result of working partnership between author & publisher.*
- *Our authors are overwhelmingly opposed to the use of AAM for OA, as an inferior version of their work & potentially problematic for trackable citation.*
- *Robust perpetual access mechanisms exist for published material, but no risk assessment for digital preservation via repositories for green OA.*
- *If a VoR OA book is desirable, RE has obvious mechanism for compliance: 0.66% of current QR funding would support gold OA for longform outputs in next REF if submissions are comparable with REF2021 (<https://bit.ly/3Vcx6OW>)*

Question 13

Do you agree with the proposal of a maximum embargo period of 24 months for longform publications?

- yes/no/not sure/no comment
- please provide any further comment
- We are strongly opposed to an embargoed green model for longform publication. Any current discussion or research on the impact of OA on book sales is not informed by the presence of a mandate which would inevitably alter the landscape entirely. There is considerable risk to the entire ecosystem of monograph publishing in proceeding based only on assumptions.
- A 24 month embargo, or any embargo regardless of length, for books risks entrenching a two-tier system in which the humanities has secondary status and in which wealthier institutions have competitive advantage through an option for gold OA. Green OA is inequitable OA.
- [A recent study by the Association of University Presses and Ithaka S+R](#) determined that OA monograph print sales were only around \$2,973 (£2,335) on average after 12 months, which is a firm indicator that an unfunded OA model, even with embargo, is unlikely to cover the essential cost of publishing.

Question 14

Is licensing for third party materials not being granted a reasonable ground for exemption from open access requirements?

- yes/no/not sure/no comment
- please provide any further comment
- As this opinion piece, '[Open-access books will push art history out of the picture.](#)' in the THE observes, obtaining licences to use images and other third party permissions in academic publications is already onerous and expensive. Neither universities nor publishers are typically able to cover such costs, which can run into thousands of pounds. Hence, they are usually met by the authors themselves, despite publishing being a requirement of their employment contracts. Any requirement for a CC-BY licence risks a significant increase in these costs, in turn making a discipline such as Art History the exclusive preserve of the wealthy.

Question 15

Is sharing of a version of an output without third-party materials if licensing can't be obtained, mirroring the UKRI open access policy for longform outputs, appropriate to meet the open access requirements for REF 2029 policy?

- yes/no/not sure/no comment
- what issues does this present for output submission and assessment?
- This suggestion creates the absurd scenario of compliance over common sense. Close textual analysis without the text or an Art History study without the art would be onerous for the author and pointless for the reader. It further penalises the humanities and even the suggestion shows a worrying lack of understanding. Would a STEM publication be asked to publish without data or formulae or statistics in the event of copyright concerns?

Question 16

Do you agree with the principle of a tolerance level for non-compliant longform outputs?

- yes/no/not sure/no comment
- please provide any further comment

Question 17

Do you agree with the proposed tolerance level of 10% for longform outputs?

- yes/no/not sure/no comment
- please provide any further comment

- This will be the first time that longform outputs have been in scope for REF so it is likely that a significantly higher tolerance figure will be needed for the transition. The contraction of some humanities departments as part of recent university restructures will also create unintended statistical significance by percentage. We therefore propose 30% as tolerance for this REF.

Question 18

Do you agree with the proposed date for implementation of an open access policy for longform outputs in REF 2029 being for all longform publications for which contracts are agreed from 1 January 2026?

- yes/no/not sure/no comment
- please provide any further comment
- With policy unlikely to be confirmed until at least the end of 2024, the proposed implementation date leaves very little time for authors, institutions and publishers to adapt.
- One of the unintended consequences of this is to discriminate against early career researchers. Whilst established authors may have books already under contract prior to January 2026 and therefore not required to be OA, first time book authors – a constituency which struggles to access funding for OA publication – who complete their books after the date may be forced to opt for an inferior, embargoed green option, putting them at a citation disadvantage.

Question 19

Do you agree with the proposed exceptions for longform publications?

- yes/no/not sure/no comment
- should any of the above be removed?
- are there other exceptions you think are necessary for longform outputs? Please provide evidence in support
- The UKRI policy explicitly exempts scholarly editions whereas the REF consultation does not. Yet, the REF draft is at pains to indicate that UKRI compliance will be taken as REF compliance. In order to bring REF and UKRI policy into harmony scholarly editions, with a range of distinctive complexities, should be exempt from the REF policy.