

# Response ID ANON-RE72-PNEG-A

Submitted to REF 2029 Open Access Consultation  
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## Transparency Statement

### Your Details

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

Organisation or institution

2 What is your organisation/institution?

Organisation:  
Society Publishers' Coalition

3 Country

Other (Please state below)

Other:  
UK and international

### Section A: open access developments in the sector

4 What are the most important changes in the open access landscape since the development of the REF 2021 open access policy?<sup>1</sup>) How do these differ across disciplinary areas?<sup>2</sup>) What are the implications of these changes for the REF 2029 open access policy?

OA landscape changes:

There has been a growth in the number of journal articles that are published open access (OA). For self-publishing learned societies, this has been facilitated by the UKRI-sponsored SPA OPS (Society Publishers Accelerating Open Access and Plan S) project. As a result, many societies have demonstrated quick progress in increasing the proportion of Versions of Record (VoRs) published immediately OA. The withdrawal of cOAlition S funder support for APCs in hybrid/subscription journals from 2025 onwards will slow, and may temporarily reverse, this progress. Many learned society journals are faced with a dilemma in which the majority of the articles they publish may be OA, but new Read & Publish agreements which will increase their proportion of OA articles are being added slowly. There is still a long way to go before many key disciplinary journals will be able to switch to complete OA publishing. Underlining this point, a Jisc report published in March 2024 noted that, 'Based on the journal flipping rates observed between 2018-2022 it would take at least 70 years for the big five publishers to flip their TA titles to OA'. It cannot be assumed that the key journals across a range of fields will be OA by 2029. For some learned societies, particularly in the Arts, Humanities and Social Sciences (AHSS), OA progress has been accompanied by pressures to publish more articles (threatening academic integrity/quality); expectations of a significant drop in future income (adversely affecting the societies' ability to fund through their own commercial arrangements the activities that they undertake to support their disciplines); and some anxiety about what arrangements for supporting OA might follow the current transitional agreements post-2025. OA publishing of the VoR has been facilitated by transformative/Read & Publish deals. If these deals are not maintained (we note the cOAlition S funder withdrawal), the volume of VoR OA in the AHSS is likely to reduce. These developments reinforce the importance of reasonable Gold and Green models of OA for REF 2029, so that outputs are not excluded, and there is not undue need to rely on exceptions and non-compliance tolerance. Much less developed is OA for longform outputs, a medium of particular importance for AHSS disciplines. The UKRI OA policy is supported by significant additional funding to support OA longform outputs, but there is currently no obvious mechanism to fund OA for longform outputs submitted to the REF. Nor is it clear that publisher policies will support OA through deposit of the author's accepted manuscript (AAM) version of longform outputs, which will put pressure on the proposed REF OA requirements for longform publications. We wait with interest to see what might arise from the current SPA OPS 4.0 project, which aims to help learned society book publishers transition to OA (e.g. through collaborative library models).

### Section B: journal articles and conference proceedings

#### Section B: publication, deposit

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

No

If yes, why? What would be an appropriate time limit for deposit post acceptance?:

#### Section B: access, licensing

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?

No

What, if any, negative or positive impacts might there be from this change?:

We believe that -NC should remain an allowable element of the Creative Commons licence, to protect the content of articles that have specific commercial/industry dimensions, as well as more generally to protect the financial sustainability of journals. However, we welcome the fact that -ND will be an allowable element.

## Section B: pre-prints, alternative platforms

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

No

Please provide any further comment:

While we might in principle support the use of alternative platforms as additional paths for meeting open access requirements, this should not be at the expense of the primacy of the journal-published version of record (VoR). In a world where many shadow or echo versions of an article may proliferate, the journal VoR is crucial for protecting the integrity of the scholarly record. For example, pre-print servers have proved effective in rapid dissemination of scholarly research, as was the case at the start of the COVID-19 pandemic. However, false claims and unsound research have also been published on pre-print servers, and not promptly been identified as such. The pre-print infrastructure is far from ready to replace the journal-published VoR which is required for an exercise like the REF.

## Section B: embargo periods

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?

Not sure

What, if any, negative or positive impacts might there be from this change?:

There will be a range of views on embargo periods within the membership of the Society Publishers' Coalition (SocPC), depending on particular experiences - which may reflect disciplinary differences. We welcome the fact that the proposed policy recognises these different disciplinary perspectives.

We do recognise that some SocPC members will take the view that the shortening of embargo periods is not viable. Anything that makes some journals 'non-compliant' impinges on author choice (specifically for authors who do not have access to funds for Gold OA), potentially curtails the scope for learned societies to develop their approach to sustainable OA transition, and may reduce diversity in the publishing ecosystem.

## Section B: tolerance limits, implementation date

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

No

Please provide any further comment:

If the final policy is not to be announced until late summer or autumn 2024, then to impose it on journal outputs published from 1 January 2025 is far too soon. It will mean that the policy will apply to outputs that will have already entered the publishing process before the policy is announced. In many disciplines, the peer review cycle can last up to 12 months. If the policy is applied to journal outputs published from 1 January 2026, that will give authors and learned societies time to ensure that articles will be compliant from the inception of the publishing process.

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

No comment

please provide any further comment :

We welcome the fact that outputs for which an exception is claimed will not be counted within the non-compliant tolerance limit.

## Section B: exceptions

11 Do you agree with the proposed exceptions for journal publications?

Yes

Should any of the above be removed?:

We welcome all six exceptions that are proposed for journal publications. In respect of exception 1, concerning articles with third-party content 'for which licences could not be obtained', we think it should be made clear that justifiable reasons for not being able to secure a licence should include not just

where a rights holder has declined to grant an OA licence, but also where the licence fee is prohibitively expensive.

We think that the process for claiming exceptions for both journal and longform publications should be a light touch one, with authors simply being able to submit a notification.

What, if any, additional exceptions might be required?:

The detailed definitions of output types for REF 2029 should make it clear that outputs from conferences can be published as edited book collections and book chapters (i.e. longform publications), not just as 'conference proceedings' (which are governed by the journal articles policy). This would make the REF OA policy consistent with the UKRI OA policy.

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

### Section C: publication, deposit and embargo

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)?

Not sure

Please provide further comment:

We agree that there should be no separate deposit requirement for longform publications where the longform VoR is made available OA. This will simplify the administration of the REF for everyone.

We agree that an output for which the AAM version has been made available OA within a specified embargo period should be compliant with the REF OA policy. However, we believe that the proposed embargo period of only 24 months is too short – see our answer to question 13.

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

No

Please provide any further comment:

The proposed maximum embargo period of only 24 months for a monograph or edited book collection is too short. The supposed justification is that 'most sales' are in the first two years. But without firm evidence providing reassurance that sales would not be affected detrimentally if everyone knew that a free version - even if only the author's accepted manuscript (AAM) - would be available after only two years, the policy should not gamble with the future of the academic book publishing ecosystem.

Many publisher policies do not allow deposit after 24 months, and the REF 2029 requirements should take account of what options are currently available to authors of longform outputs, which are such an important type of submission. The requirements should not disincentivise the inclusion of books by setting requirements that many will see as unachievable.

### Section C: access, licensing

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

Yes

Please provide any further comment:

Many books make use of third-party materials, and it would negatively impact the overall analysis and argument of such works (indeed would make them meaningless) if the books were disseminated without materials that could not be included because OA licensing was unobtainable or unaffordable.

As we argue in question 19, scholarly editions, scholarly illustrated catalogues, and exhibition catalogues should be out of scope of the REF policy (just as they are out of scope of the UKRI policy), and that would remove the need for many exemptions to be claimed for third-party content complications.

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?

No

Does this present issues for output submission and assessment?:

The redaction of key third-party materials can render the analysis and argument in any book or chapter meaningless.

### Section C: tolerance level

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

Yes

Please provide any further comment:

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

No

Please provide any further comment:

We welcome the fact that outputs for which an exception is claimed will not be counted within the non-compliant tolerance limit. Because REF OA policy is being extended to longform outputs for the first time, we believe that a more generous tolerance limit should be set for this REF cycle.

### Section C: implementation

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?

Not sure

Please provide any further comment.:

We welcome the fact that the proposed implementation start date is to be defined by the date on which longform outputs are contracted. We recognise that the typical lead times between book contract and book publication can be quite long. However, there are some suggestions that it would be more sensible for the longform policy to be introduced for the following REF cycle.

### Section C: exceptions

19 Do you agree with the proposed exceptions for longform publications?

Yes

Should any of the above be removed?:

We welcome all seven exceptions that are proposed for longform outputs. As we have argued in question 11, we believe that the process for claiming exceptions should be a light touch one, with authors simply being able to submit a notification.

Are there other exceptions you think are necessary for longform outputs? Please provide evidence in support.:

The REF OA policy should be made consistent with the UKRI OA policy in respect of which longform output types are in scope and out of scope (as was promised at the time of the UKRI OA consultation in 2020). In addition to trade books and creative works, scholarly editions, scholarly illustrated catalogues, exhibition catalogues and textbooks should also be listed as being out of scope of the REF OA policy, as they are in the UKRI OA policy.