December 12, 2013

Dear Tri-Council Colleagues:

Thank you for the opportunity to provide feedback on the Tri-Agency Draft Open Access Policy. We applaud the Tri-Agencies for moving this important initiative forward. As a leading institution in the area of Knowledge Mobilization, York strongly supports the idea of open access to research outputs to influence cultural, social, health, economic, scientific and environmental impacts. After consulting with our colleagues across the institution, we would like to offer the following feedback for the Tri-Agencies’ consideration in moving this initiative forward.

York’s faculty members were generally supportive of the concept of open access and they are grateful to the Agencies for making the costs of publishing in open access an eligible grant expense. However, there are concerns regarding the cost of complying with an open access policy versus the current funding mechanisms available. As many Tri-Agency budgets are reduced at the award stage and the cost of open access publishing, which can be in the range of $3,000 per publication in some disciplines, are borne by the researcher, these substantial costs will need to be assumed from already stretched grant budgets. Also, as many peer-reviewed publications that can be attributed to the grant are completed after the funding is completed, our researchers are concerned about the ability to comply with the policy after grant dollars have expired. We would strongly encourage the Tri-Agencies to consider what supports could be made available to institutions or individual researchers to offset these costs.

One area that we would encourage the Tri-Agencies to clarify, based on the feedback from our colleagues, is what version of the manuscript will be acceptable to satisfy the self-archiving requirement in Option #2 of the draft proposal. Many publishers have strict limitations regarding what version of manuscript researchers can make publically available and it will be important for the Agencies to be clear regarding what the expectations are of researchers and which version of the manuscript is acceptable to comply with the policy. Doing so will help to avoid a situation in which funded scholars are inhibited from publishing in the top peer reviewed journals in their disciplines.

Many of our colleagues have also expressed concern over what will happen to smaller journals that are often supported by scholarly societies. As these journals often rely on subscription revenue, the movement towards ensuring open access may jeopardize their survivability and these are key venues for scholars in certain disciplines to publish and share their research results.

Thank you for the opportunity to share our thoughts through this consultation process. We appreciate your continued consultative efforts to ensure the policy is an effective tool to support open access of research outputs. Thank you for your consideration of our recommendations. I would be pleased to speak with you further about our comments.

Yours sincerely,

Robert Haché, Ph.D.
Vice-President Research & Innovation