

SWEDISH RESEARCH COUNCIL TRIES TO LEAP FOR THE MOON BUT NEVER LEAVES THE GROUND

- Comment on the SRC draft guidelines for Open Access

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In October 2014 the Swedish Research Council published draft national guidelines for open access and invited public comments.¹ The SRC had been assigned to develop these guidelines by the Swedish Government in 2013. The Government in its turn was responding to a recommendation from the European Commission "on access to and preservation of scientific information" in 2012.²

The SRC guidelines have two main chapters, the first on open access to scientific publications and artistic works, and the second on open access to research data. I restrict my comments to the first part. It says that the following guidelines shall come in effect 2025. "All peer-reviewed articles and conference reports emanating from publicly funded research shall be published open access immediately (so called gold open access) and they shall have a CC-license." Thereafter identical requirements are phrased for books and artistic works

It proceeds by saying that these guidelines will come in effect **on the condition** that a number of consequences and problems related to the guidelines get a solution. Then follows a long list of consequences and proposals for new studies, where issues like the academic career system, licenses, open access book publishing, journal quality, costs and economic transition problems are

discussed without formulating any concrete proposals or plans.

A strange combination

I find it very hard to understand why the SRC has chosen this model of combining very far-reaching mandates in a distant future with conditions concerning the solution of a range of difficult problems in the meantime.

A mandate for OA gold that is to come in effect in 2025 seems fairly meaningless and might even be counterproductive. We really can not know where the publication system has come by that year. The share of OA journals will most likely go on rising but we might still have a mixed offering of journals, including new publication models that we could not envision today. And the outcome cannot to any significant degree be influenced by Swedish OA guidelines.

Instead such guidelines can only arouse suspicions and critique from researchers that for the time being prefer the green road. OA guidelines should respect researchers free choice of where to publish, for which the green road is needed for a foreseeable future. It is far more sensible to eliminate or reduce some of the strong factors that currently restrain researchers from publishing in OA journals, for instance by adjusting the recruitment and career evaluation system and by creating a more coordinated model for paying article processing charges, when these are needed. But here the SRC guidelines have no concrete proposals or plans.

CC-licenses and books

The demand for unspecified CC-licenses further adds to the lacking realism of these guidelines. How should we know that the time has come to make them

¹ Vetenskapsrådet. Nationella riktlinjer för öppen tillgång till vetenskaplig information. <http://www.vr.se/omvetenskapsradet/regeringsuppdrag/regeringsuppdrag/nationellariklinjerforoppentillgangtillvetenskapliginformation.4.7e727b6e141e9ed702b1307e.html>

² COMMISSION RECOMMENDATION of 17.7.2012 on access to and preservation of scientific information, C(2012) 4890 final. http://ec.europa.eu/research/science-society/document_library/pdf_06/recommendation-access-and-preservation-scientific-information_en.pdf

mandatory within national OA guidelines in eleven years from now? We are far from a unified evaluation of the role of CC-licenses within the international OA-movement today. It has for instance been pointed out that they square poorly with green OA, and that they may be judged quite differently within say humanities as compared to biomedical sciences.^{3 4} The reasonable position today is that of the EU in Horizon 2020: "In all cases, the Commission encourages authors to retain their copyright and grant adequate licences to publishers. Creative Commons offers useful licensing solutions in this regard (e.g. CC-BY or CC-0 licences..."⁵

The same can be said for the OA mandate for books in the SRC guidelines. It is too early now, it is wiser to make recommendations and support initiatives for open access to books.

Out of line with Commission requests

The SRC guidelines are not only unrealistic, they are also out of line with what the Commission has requested from the member states.

The first point in the Commission recommendations says that member states should "Define clear policies for the dissemination of and open access to scientific publications resulting from publicly funded research. These policies should provide for:

- concrete objectives and indicators to measure progress;
- implementation plans, including the allocation of responsibilities;

³ Harnad Follow-up Comments on BIS select Committee on Open Access, Monday, April 2013. <http://openaccess.eprints.org/index.php?/archives/1004-Harnad-Follow-Up-Comments-to-BIS-Select-Committee-on-Open-Access.html>

⁴ Heather Morrisons blog The Imaginary Journal of Poetic Economics. A simple definition for open access: a proposal to open the discussion. http://poeticeconomics.blogspot.se/2013/01/a-simple-definition-for-open-access_8.html. Part of the Creative Commons and Open Access Critique series. <http://poeticeconomics.blogspot.ca/2012/10/critique-of-cc-by-series.html>

⁵ Guidelines on Open Access to Scientific Publications and Research Data in Horizon 2020. Version 1.0. 11 December 2013. http://ec.europa.eu/research/participants/data/ref/h2020/grants_m anual/hi/oa_pilot/h2020-hi-oa-pilot-guide_en.pdf

- associated financial planning."⁶

The SRC writes that the Commission has asked member states (1) to develop guidelines for OA and (2) to produce a plan to implement the guidelines, including allocation of responsibilities. They regard the guidelines for OA in 2025 as the answer to the first demand and the discussion about consequences and problems as their way of fulfilling the second. But the Commission most likely asks member states for policies that are in accord with its own policy in Horizon 2020. This means open access (not only gold OA) "preferably immediately and in any case no later than six months after the date of publication, and twelve months for social sciences and humanities;"⁷ The recommendation notably stresses concrete objectives and implementation plans, and specifies a number of desired results, for instance that "the academic career system supports and rewards researchers who participate in a culture of sharing the results of their research"⁸ The general discussion in the SRC guidelines about this and other issues is far away from what the Commission has requested in terms of concreteness.

Institutional policies and plans

The Commission recommendation also ask member states to ensure that the research funding organizations and academic institutions receiving funding implement the national guidelines by institutional policies and plans. Sweden has already come a rather long way in this respect, but having OA policies and plans at all public research funders and universities would make a great difference. Then of course it would be beneficial for the efficiency and the uptake among researchers that these policies were tightly coordinated and the adherence to them regularly evaluated. The issue of institutional policies is not even mentioned in the SRC guidelines.

A question of perspective

It is striking that almost nothing is said about the role of universities. National guidelines should be national, i. e. relate to and instruct all public institutions involved in scientific information, not only research

⁶ See note 2

⁷ See note 5

⁸ See note 2

funders but also the universities. Possibly the somewhat unrealistic stance of these guidelines reveals that the research funders perspective has dominated. A research funder can set high demands; researchers that do not agree do not have to apply for funds. But on a national level we have to find workable solutions for all researchers.

Rewriting is needed

National guidelines for open access could have a positive impact if they took their point of departure from the present state of open access developments in Sweden and set targets that could really be affected by Swedish public institutions.

The guidelines should formulate goals for a foreseeable future - three to five years ahead - they should specify and prioritize a number of actions to reach those goals, and specify responsibilities and terms of cooperation for the public authorities involved. The issues brought up within the discussion part of the SRC document are relevant and could possibly be developed into concrete objectives and plans. But a serious rewriting is needed.



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