

Targeted consultation: NHMRC's draft *Open Access Policy* and *Open Access Policy – Further Guidance*

Please complete the table below with your feedback and return via email to quality@nhmrc.gov.au by **5.00pm AEDT Wednesday 5 May 2021**.

Name	Dr Cath Latham
Institution	Australian Academy of Health and Medical Sciences
Position	Interim CEO
Is this feedback on behalf of an individual or institution?	Institution
Feedback on the <i>Open Access Policy</i>	
Section 3. Definitions	<p>AAHMS supports the updated definitions in the draft NHMRC Open Access Policy.</p> <p>To improve the definitions further, we propose that examples of 'metadata' should be provided in this section to better guide authors. As metadata is such a broad term, examples of the types of metadata to be included in the repository would assist authors in understanding whether their metadata is covered by the policy. The examples of metadata provided in FAQ 10 of the "Further Guidance" document should be provided in this section to provide context to the definition of metadata used in this policy.</p>
Section 4.1 Publications	<p>AAHMS supports the NHMRC's broader principle to move towards a more open and accessible publication environment, bringing Australia into step with movements by funding organisations in the US^{1,2,3} and Europe (including the UK)⁴.</p> <p>However, we have specific comments regarding the changes introduced into the Publications section of the Open Access policy:</p> <ol style="list-style-type: none"> 1. The process that an author should take to apply for a CC BY licence should be clearly articulated within the policy document. For example, the legal guidance provided in the accompanying "Further Guidance" document for FAQ 15 could be reproduced in this section of the policy. There are resources provided by other organisations that could be adapted for the Australian context to better assist authors in applying the policy⁵. 2. We support the statement clarifying the author's choice to participate in paid open access programs under this policy. The choice for a researcher to publish research in the most appropriate journal for the findings and for greatest impact is imperative to maintain an environment of research excellence and impact for NHMRC-funded research. The author's discretion should be maintained in the policy understanding that immediate and open access is not available without charge from all reputable publishers. 3. It is currently unclear what potential financial ramifications will arise for NHMRC-funded researchers in the longer term as a result of this policy change. There may be moves by publishing houses to levy authors, readers and/or subscribers (such as universities) through as

	<p>yet unidentified means. The impact of increased costs of publication to maintain impact and excellence of NHMRC-funded research should not be underestimated, given that research institutions already cover a significant shortfall to conduct research with NHMRC grants awarded. The NHMRC should consider how researchers will fund these increased costs. The advice provided in FAQ 19 is not a realistic source of this financial support as the current funding rules for direct costs already create a funding gap that must be covered by researchers, universities and medical research institutes.</p> <p>Please contact Cath Latham, AAHMS Interim CEO (Ph 0413865459, cath.latham@aahms.org) if the NHMRC would like to discuss any of these matters further.</p>
Options for application of this Policy for NHMRC grants commencing prior to 1 January 2022 (Option A or Option B)	<p>AAHMS supports <u>Option B</u> for grants commencing prior to 1 January 2022 whereby a 12 month transition to the new open access policy will be in place for existing grant holders.</p> <p>AAHMS supports this approach because grant holders and their collaborators will be provided with reasonable notice of the policy change which will be followed by harmonising the requirements for existing NHMRC grant holders with those newly funded by NHMRC. This approach will minimise the administrative load for both authors and the NHMRC while supporting a swift move to a more open access environment in Australia.</p> <p>It should be noted that both these options assume that the research community is moving to a more open access environment. A choice is provided regarding only the speed at which the change is implemented. Many of the factors governing whether an article is open access are not within the control of the publication author/s. If the policy change to a more open access environment is inevitable and high priority for NHMRC, then it will be essential that the research sector – researchers and research organisations – are supported throughout the transition.</p>
<i>Feedback on the Open Access Policy – Further Guidance ‘Frequently asked questions for publications’</i>	
FAQ 4	AAHMS supports this update in line with the revised policy.
FAQ 5	AAHMS supports this revision as it increases clarity.
FAQ 8	AAHMS supports the expansion of this advice regarding the use of preprints to increase accessibility of research findings. This approach has proven particularly relevant in the COVID-19 era where preprints have garnered extra attention and provided a mechanism for rapid advancement of fast moving and emerging fields of research.
FAQ 9	AAHMS supports the added clarity on dates of publication and suggest that the second sentence should be removed as it is redundant.
FAQ 11	AAHMS appreciates that the policy acknowledges the possible delay between deposition in a repository and publication of data which is beyond the control of the NHMRC-funded researcher subject to this policy.
FAQ 12	In principle, AAHMS supports the immediate requirement for depositing publications into a repository, which aligns with the updated NHMRC Open Access Policy.

FAQ 13	AAHMS supports the addition of a list of locations for publication compliant with the open access policy. This guidance could be further expanded to provide a list of repositories, publishers/journals available to Australian researchers (similar to the Journal Checker Tool ⁶ developed by cOAlition S).
FAQ 14	AAHMS supports the addition of important information on CC BY licences for researchers publishing in journals that do not yet allow the author to make the Version of Record immediately openly accessible.
FAQ 15	AAHMS supports the addition of important information on authors' legal rights to application of a CC BY licence. Due to its importance, we suggest that the contents of this FAQ be moved to the main policy document. Please see comments provided in the section relating to Section 4.1 Publications.
FAQ 16	AAHMS supports the author's choice to publish where they deem their research is most suited according to their field and impact of the work. However, the longer-term ramifications of such an approach are unclear. While the CC BY licence should provide a path for open access, the actions of individual publishers in response to this move are unknown and will likely result in increased costs shifted to authors or their host institutions in other ways. The potential impact is discussed in an associated submission from the Academy.
FAQ 18	AAHMS supports the application of NHMRC's policy to all collaborators.
FAQ 19	<p>The advice provided in FAQ 19 should be clearer regarding NHMRC grant support for costs that may arise from the changes introduced in this policy. As it is written, the guidance appears to state that NHMRC funds <u>can</u> technically be used for covering open access costs, however, this cannot be budgeted at the time of grant application. The impact is that this can only practically be applied by NHMRC-funded researchers if delivering the research comes in under budget.</p> <p>While the flexibility is appreciated, it is not likely that this can be applied in most circumstances as additional funds from other sources are usually required to deliver NHMRC funded research. For example, a PSP5 salary is \$101 924⁷, but the market standard (including on costs) for a staff member at this level is \$195 601⁸. The gap in these people support costs, including additional on-costs for leave and other entitlements are covered by the researcher and the research organisation.</p>

REFERENCES

- ¹ Van Noorden R. Wellcome and Gates join bold European open-access plan. 5 Nov 2018. Nature. Available at: <https://www.nature.com/articles/d41586-018-07300-5>
- ² Brainard J. HHMI, one of the largest research philanthropies, will require immediate open access to papers. 1 Oct 2020. Science. Available at: <https://www.sciencemag.org/news/2020/10/hhmi-one-largest-research-philanthropies-will-require-immediate-open-access>
- ³ cOAlition S (2020) The Templeton World Charity Foundation joins cOAlition S. Available at: <https://www.coalition-s.org/the-templeton-world-charity-foundation-joins-coalition-s/>
- ⁴ cOAlition S (2018) About cOAlition S: Organisations endorsing Plan S and working jointly on its implementation. Available at: <https://www.coalition-s.org/> (last accessed 27 April, 2021)
- ⁵ Pascal Braak, Hans de Jonge, Giulia Trentacosti, Irene Verhagen, & Saskia Woutersen-Windhouver. Guide to Creative Commons for Scholarly Publications and Educational Resources (Version final) (2020, October 28) Available at: <http://doi.org/10.5281/zenodo.4090923> Note: This publication is focussed on advice for authors in the Netherlands.
- ⁶ cOAlition S (2020) cOAlition S releases the Journal Checker Tool, a search engine that checks Plan S compliance. Available at: <https://www.coalition-s.org/coalition-s-releases-the-journal-checker-tool/> Tool available at: <https://journalcheckertool.org/>
- ⁷ NHMRC (2021) Personnel and Salary Support Packages. Available at: <https://www.nhmrc.gov.au/funding/manage-your-funding/personnel-and-salary-support-packages>
- ⁸ University of Sydney (2021) Salary Scales – Level D 2021 Base. Available at: <https://www.sydney.edu.au/content/dam/corporate/documents/research/USydney-salary-scales-FT16-Sydney-Salary-Scales.pdf>