



December 13, 2013

Dear CIHR/NSERC/SSHRC Tri- Council Agencies,

The Canadian Psychological Association (CPA) would like to take the opportunity to provide feedback on the proposed Tri-Agency Policy on Open Access. Representing over 7,000 members and affiliates, domestically and internationally, the CPA is Canada's largest association for psychology. Our members cover a very broad range of subject areas within psychology and are funded by all three of the federal councils.

The new policy has the laudable goal of supporting the principle of knowledge sharing and free access to research results; it is a goal we wholeheartedly share. However, it is important that any possible unintended consequences be considered before implementing such a policy. The CPA has a number of concerns on that point, which are elaborated below.

First, there is no indication that the agencies will increase grant funding to allow researchers to publish in open fee-for-publication journals. Open access fees tend to fall in the range of \$1,500 to \$6,000 per article. These are grant funds that will be taken away from student support and other research needs, especially in productive areas where 10-20 publications may result from a single grant (i.e., up to \$120,000 in open access fees). Open access journals have a conflict of interest between maintaining high standards and making a profit. Thus, it is in their best interest to publish as many papers as possible, which is likely to lower the probability of rejecting them. This problem is not mitigated by impact factors and other quantitative measures of quality. We have heard of instances in which open access journals require authors to include a certain number of citations to papers published in that journal in order to artificially increase citation rates. When a journal relies on authors to pay for publication, it is likely that quality will be sacrificed for quantity.

Second, the new policy implicitly supports the publishing industry's set of business rules (i.e., copyright policies) that will now have the force of internal law to constrain in what journals tri-council funded research can appear. In particular, researchers will be forced to use a restricted number of outlets for their work, rather than being free to choose the journal that is best suited to their research. Although many journals do allow for draft articles to be placed in repositories, there are some that do not and others that have complicated and difficult to understand copyright rules.

Third, the policy allows that "Grant recipients archive the final peer-reviewed full-text manuscript in a digital archive where it will be freely accessible within 12 months (e.g., institutional repository or discipline-based repository)." We are concerned that researchers from smaller institutions will be disadvantaged by the lack of a repository at their institution.

Although many institutions provide repositories already, we strongly recommend, before this policy is implemented, that researchers funded by SSHRC and NSERC be allowed to deposit their tri-council supported articles in PubMed Central Canada.

Fourth, this policy places another administrative burden on otherwise strained researchers. Not only are we encumbered with filling out new and constantly changing forms for grant proposals, we will now be required to keep track of publication dates and remember to upload our drafts to a repository at different times after publication (depending on the journal). It would be preferable if there was a way in which the author could upload the manuscript to the tri-council repository as soon as it is accepted and set a date on which the manuscript will be released automatically. This would reduce, although not eliminate, some of the load that such a policy will place on the researchers.

Fifth, the policy does not state the consequences of mistakes that may be made. What if a researcher forgets to release his or her article in the appropriate time frame? What would happen if a researcher inadvertently published a paper in a journal that restricts archiving as part of their copyright agreement? How will the policy be monitored and enforced? Is it reasonable to put federal resources into policing such a policy when the funds would be better used to support research?

While the goal of open access is to make results more accessible to all, we submit that most scientific studies are written at a level that requires technical expertise that the general public does not have. People, who do have such expertise, in most of the western world, generally have access to the journals through their institutional libraries. Although experts who reside in some poorer countries may have more limited access, a common practice has been to request articles/reprints from the original authors and the authors, to our knowledge, tend to promptly respond to such requests. As such, we are of the opinion that the costs of open access may outweigh its benefits.

Again, we wish to stress that the ideal of open science is one we share; however, the proposed implementation is far from free of difficulties. We urge the agencies to take some time to consider the points that are raised in this letter, as well as from other scientific organizations.

Sincerely,



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About the Canadian Psychological Association

The Canadian Psychological Association (CPA) was organized in 1939 to improve the health and welfare of all Canadians; to promote excellence and innovation in psychological research, education, and practice; to promote the advancement, development, dissemination, and application of psychological knowledge; and to provide high-quality services to members. For more information about CPA, please visit: www.cpa.ca. For additional information on the CPA or to discuss issues raised in this letter, please contact us at executiveoffice@cpa.ca.