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9 June 2014

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To Whom it May Concern,

I am writing on behalf of the Association of Canadian University Presses / Association Des Presses Universitaires Canadiennes, which represents the interests of Canadian scholarship. Through their publishing activity, ACUP/APUC members support the broadest distribution of Canadian research results and scholarship. This letter is in response to the request for input from the Canadian Federation for the Humanities and Social Sciences on the draft Open Access and Monographs Policy released in May 2014.

As outlined in the 13 December 2013 response to the Tri-Agency policy, ACUP/APUC supports Open Access in principle. As stated in ACUP's report, "Monograph Publishing in an Open Access Context" (<http://www.acup.ca/wp-content/uploads/2014/03/ACUP-report-open-access.pdf>) presented to the Federation in February 2014, ACUP is committed to working with the Federation to explore possibilities for developing viable Open Access business models in Canada.

ACUP/APUC is pleased to see that the Federation unequivocally recognizes in the draft policy that financial support for viable Open Access publishing is required, and that an optional rather than mandated Open Access policy for ASPP-funded monographs is recommended: "The Federation's preliminary consultations revealed that adopting a mandatory Open Access policy for the ASPP could lead to serious and unpredictable effects on Canadian scholarly publishing, and may even threaten the viability of some presses."

We do, however, have some serious concerns. The Open Access and the ASPP Draft Policy Position is built on a model derived from research and publication forms and cycles in the sciences that are neither suitable nor sustainable for social sciences and humanities monograph publication. There are some key differences between journal and monograph publishing, as well as differences between the sciences and the social sciences and humanities (SS/H), which must be taken under consideration in developing an Open Access approach:

- Monographs are not a primary form of dissemination in the sciences, and their production lifecycle is both longer and more complex than journal articles. Monographs often take years to write and produce: text comprises the essential 'data set' of much SS/H work, and there is considerable exchange between authors and publishers in the value-added processes of substantive editing, peer review, design and production, metadata creation and dissemination in developing texts to full published form. Reviews and circulation post-release can also take months, contributing to a slower uptake cycle for monographs.
- Unlike journal articles in the sciences, the impact and revenue of monographs in the social sciences and humanities is much less

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Studies

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predictable, as reflected by sales patterns. The embargo period proposed by the draft policy may be based on the environmental scan offered in the Appendix to the draft, but in all policies referenced there those embargoes have been based on the model of scientific journal publishing.

There are significant financial differences between research and publication in the sciences and the social sciences and humanities.

- University and scholarly presses exist as hybrid entities, positioned both within scholarship and within the larger publishing environment, operating on a cost-recovery basis. All Canadian university presses, including those operating in some degree of Open Access, rely on a range of revenue sources to support their publishing programs. Open Access mandates and practices that threaten those revenue sources can have an indirect impact on other critical sources of revenue. For example, an Open Access approach that reduces lifetime sales of a work can affect results of a funding process (such as the Canada Book Fund through Heritage Canada) that allocates funding based on sales rather than current scholarly measures of impact such as citation measures or downloads.
- An embargo period of twelve months does not adequately account for the long tail of SS/H monographs, the fact that on average approximately 50% of the revenues of an ASPP eligible monograph are generated after that point. A preliminary survey among the four largest ACUP/APUC member presses (who produce the greatest number of ASPP-supported books) indicates that a typical monograph generates a loss of \$15,000 to almost \$20,000 per title. Already operating at a loss on these titles means that presses cannot absorb any of the further reduction of revenue threatened by the Open Access policy without increasing substantial risk to our already challenging position vis-à-vis sustainable publishing models.
- We are pleased to see the draft policy acknowledge that if Canadian university and scholarly publishers are no longer sustainable the result will be that Canadian scholars may not be able to publish their work in Canada or elsewhere, as non-Canadian publishers have little motivation to publish work with the significant financial risks of a small market for Canadian-generated or -focused research in SS/H. A drop in revenue associated with the proposed models would put Canadian scholarly presses at significant additional risk.

Recommendations:

To maximize publisher participation in open access monograph publishing, we recommend the Federation:

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1. Consider carefully the direct correlation between the embargo period and the scale of financial support required to make Open Access publishing a viable and sustainable alternative. A twelve-month embargo will require a much higher level of financial support to ensure publishers are able to participate in Open Access publishing than would be the case with a longer embargo period, which would have a less negative impact on publisher losses.
2. We believe there are two alternative approaches to managing this challenge:
 - a. Support fewer titles at a higher level of support per title, with a twelve month embargo period; or,
 - b. Support a larger number of titles with a longer embargo. We would propose an embargo period of 36 months.
3. The policy needs to directly acknowledge the costs of publishing, the necessity of 'support' rather than 'incentive,' and more fully engage with the economics and institutionalization of supports for scholarly publishing in Canada.
4. We would be pleased to continue working in consultation with the Federation to develop reporting and metrics for determining the impact of the policy not only on the dissemination of research but also on the full scholarly communications infrastructure that produces it.

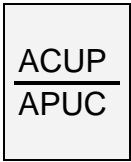
Our goal is to develop a sustainable model for the dissemination of Canadian scholarship in the interests of all stakeholders: Canadian scholars, libraries and their patrons, the general public, funding agencies, as well as Canadian university and scholarly publishers. As indicated by the Appendix to the draft policy, as well as ACUP/APUC's report on Open Access and Monographs, the implications of OA for monograph publishing are not well known due to a lack of viable, long-term models or quantitative research. Any Open Access policy addressing monographs must be evidence-based, reflexive in information gathering, and flexible in response to its effects on the scholarly communications ecosystem in Canada.

We are pleased to have had the opportunity to discuss the concerns the members of ACUP/APUC have with respect to the Federation's draft Open Access Policy, and hope we may continue to work together to develop a policy that will be effective and sustainable for everyone.

Sincerely,

John Yates

President



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