

September 17, 2014

Federation for the Humanities and Social Sciences
Awards to Scholarly Publishing Program
Via e-mail: consultation@ideas-idees.ca

We write on behalf of Concordia University in response to the call for input on the Federation for the Humanities and Social Sciences's draft policy on open access for the Awards to Scholarly Publishing Program (ASPP).

Concordia welcomes the creation of the draft policy and strongly endorses its two principles of support for open access and the recognition of the importance of a dynamic scholarly publishing sector to support the dissemination of Canadian research. We are particularly pleased that the draft policy would support, through the proposed open access financial incentive, born-digital scholarly monographs that will have no print equivalents. Given that publishers who are to receive the incentive must first qualify based on the ASPP Publisher Eligibility Criteria, we recommend that the Eligibility Criteria also be revised to explicitly include publishers who *only* produce electronic books, as well as those who produce printed books. Criterion four ("The publisher must have at least four works in print...Books must be printed, not photocopied, on paper...") would appear, in one reading, to exclude digital-only publishers.

We are also pleased that the framework of the draft policy would allow digital-only publishers who receive ASPP funding to record book downloads, not sales. Taking that metric one step further, we strongly suggest that book page views also be a required measurement so as to have the best sense of how digital books are being disseminated and accessed in Canada and abroad.

Concordia has demonstrated a commitment to open access in the academy with the goal of promoting access to research, much of which is publically funded. In 2010 we were the first university in Canada to pass an academic Senate resolution on open access. The resolution included a mandate for faculty and researchers to deposit their work in Spectrum, our open access repository, which has consistently ranked as one of the most impactful in North America. In 2011 we created a fund to support Concordia authors who wish to publish in open access journals and since 2013 we have been working on a plan to create an open access scholarly press, Concordia University Press.

A joint initiative of the Concordia University Libraries, the Office of the Provost & Vice-President, Academic Affairs, and the Office of the Vice-President, Research & Graduate

Studies, the Concordia University Press has been envisioned as a publisher of high-quality peer-reviewed scholarly monographs in the humanities, social sciences, and fine arts. The goal of the Press will be to contribute to the promotion and dissemination of scholarship and research in Quebec, Canada, and the world. The Press, supported by the Birks Family Foundation, is expected to publish its first digital-only open access books in 2015-16.

The creation of a new Canadian scholarly press recognizes the value Concordia places on academic publishing and the dissemination of research. The creation of a specifically open access press also recognizes that the current academic publishing model is becoming increasingly unsustainable for all players. By providing new ways for scholars to create, publishers to disseminate, libraries to acquire, and researchers to access high-quality books, Concordia seeks to contribute to both the democratization of the scholarship and the creation of a more diverse academic publishing landscape. By making support for digital-only publishing more obvious in the draft policy, the Federation and the ASPP will also help encourage experimentation with new models of sustainable scholarly publishing in this country.

We recognize that a healthy Canadian academic publishing environment is one that includes digital books and printed ones, as well as ongoing dialogue between authors, publishers, librarians, academic administrators, and funders. We appreciate the opportunity to comment on the draft policy and we look forward to working with the Federation and the ASPP.

Yours sincerely,

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