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UTP Response to the Proposed Tri-Agency Policy on Open Access

University of Toronto Press (UTP) is the largest scholarly press in Canada and one of the most respected university presses in North America. Founded in 1901, UTP publishes 35 journals (in print and online) in the humanities and social sciences, directed at an audience of scholars, students, and libraries. UTP has a long history of distinguished service in the Canadian academic community.

Over the years, UTP has built a solid reputation for excellence in journal management, support for peer review, copyediting, typesetting, production, distribution, and marketing. Our journals attract readers from around the world, as evidenced by our 2012 usage statistics: 1,519,454 article downloads, 502,834 abstract downloads, and 355,183 Table of Contents views. As a not-for-profit Canadian publisher, we focus on finding cost-effective solutions to maintain our journals' high standards in an increasingly competitive journal publishing environment, and Open Access (OA) has become an issue of particular interest.

Our journals rely on a stable and established revenue stream to provide publishing services to their authors and readers. Reviewing the Tri-Agency OA policy as currently proposed, we are concerned that this revenue stream may be threatened. The policy is built on a model that is suitable and sustainable for science publications but does not work well for social sciences and humanities (SS/H) journals. There are some fundamental differences in these types of journals that should be considered when developing an OA approach:

- SS/H material has a very long half-life, and most articles are not heavily used or cited until the third or fourth year after publication.
- Articles in SS/H journals tend to be considerably longer than articles in science journals, and SS/H journals tend to publish fewer articles per issue.

The Gold OA model, which generally relies on an author publication charge (APC) to fund publishing operations, poses the following issues in the context of SS/H journals:

- SS/H articles can be quite long (50+ pages), and APCs may be correspondingly high.
- The Tri-Agency OA policy does not mention any increase in research funding to cover APCs; if funding levels remain stable, a relatively large amount of the research grant will have to be allocated to APCs rather than to research.
- Many SS/H authors do not receive research grants, which means that journals would have to adopt a hybrid APC/subscription model or place the full weight of publication costs on the small number of authors who are able to carve an APC out of their research grant.
- Some journal editors, under financial pressure from institutions or associations to cover costs, may be tempted to favour inferior submissions that do have research funding over better-quality submissions that do not. Over time, such decisions would lower review and selection standards and devalue Canadian journals in the international community.
- Some universities may have funds to pay APCs for their faculty. In such cases, who decides how these funds are allocated? What happens when the funds run out? Will younger faculty be well served in this environment? Will outstanding researchers at less well-endowed universities be disadvantaged?



The Green OA model suggested in the Tri-Agency Policy, wherein an author deposits the full text of a peer-reviewed manuscript in an institutional repository, may also pose problems:

- High-quality peer review, the editorial process, superior copyediting, typesetting, XML structuring, and linked metadata mean that the original submission is often very different from an article that has been shepherded through a rigorous publication process. An article with the same author and the same title may generate considerable confusion if the content is substantially different.
- Depositing a raw manuscript that lacks the value added by peer review, copyediting, typesetting, XML structuring, and linked metadata will not have the same impact as publishing a similar article that does have those features, nor will the OA version be particularly discoverable without good metadata and marketing.
- Research by the Association of Learned, Professional and Society Publishers (ALPSP) and the Publishers Association, "[The Potential Effect of Making Journals Free after a Six Month Embargo](#)," found that 44% of libraries would cancel some or all scientific, technical, and medical (STM) titles and 65% would cancel some or all social science subscriptions. The journals most at risk would be the second-tier journals – a category which, on the international scene, would include Canadian titles.
- An embargo of 12 months would certainly mean substantial library cancellations for many of our journals, as many current subscribers would decide to wait a relatively short period for the material to be available in an institutional repository rather than subscribing.
- With a reduced revenue base, journals may be forced to lower publication standards by eliminating multiple peer reviews, plagiarism checking, copyediting, marketing, or online platform features.
- If Canadian journal publishers can no longer sustain themselves due to the drop in revenues associated with OA models, the result may be that Canadian scholars are less able to publish their work, as US and other foreign journals will be less interested in work with a Canadian focus.
- With subscription revenue under threat, Canadian journals may decide to partner with large commercial publishers outside Canada to take advantage of higher-cost aggregated deals in which smaller, secondary journals are protected, thus increasing costs to Canadian libraries and researchers and reducing the publishing expertise in Canada.

UTP does not oppose OA in principle – in fact, we publish two fully open access journals and most journals offer some freely available material – but we do think that it is important to maintain the standards of excellence for which UTP journals are noted, and this requires a dependable and sustainable source of revenue. A number of countries around the world – the United States, Australia, and the UK¹ in particular – have tried to institute OA policies, with mixed success.² Some previous OA advocates, such as Daniel Allington, have changed their position on OA and are now advocating a different approach.³ We would urge the Tri-Agencies to consider the difficulties that these policies have encountered before implementing a policy that could undermine scholarly publishing in Canada.



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1. Commons Select Committee, UK Parliament, "Government mistaken in focusing on Gold as route to full open access, says Committee" (10 September 2013), <http://www.parliament.uk/business/committees/committees-a-z/commons-select/business-innovation-and-skills/news/on-publ-open-access/>
2. David Crotty, "Rolling back Gold Open Access in the UK," *The Scholarly Kitchen* (11 September 2013), <http://scholarlykitchen.sspnet.org/2013/09/11/rolling-back-gold-open-access-in-the-uk/>
3. Daniel Allington, "On open access, and why it's not the answer" (15 October 2013), <http://www.danielallington.net/2013/10/open-access-why-not-answer/#sthash.7Y52600T.GF8hahRm.dpbs>



Journals Associated with University of Toronto Press

Anthropologica
Canadian Historical Review
Canadian Journal of Criminology and Criminal Justice
Canadian Journal of Human Sexuality
Canadian Journal of Information and Library Science
Canadian Journal of Linguistics
Canadian Journal of Program Evaluation
Canadian Journal of Woman and the Law
Canadian Modern Language Review
Canadian Public Policy
Canadian Review of American Studies
Canadian Theatre Review
Cartographica
Diaspora: a journal of transnational studies
Eighteenth-Century Fiction
Genocide Studies International
Histoire sociale/Social History
INFOR: information systems and operational research
International Journal of Canadian Studies
Journal of Canadian Studies
Journal of Religion and Popular Culture
Journal of Scholarly Publishing
Journal of Veterinary Medical Education
Lexicons of Early Modern English
Modern Drama
Mouseion
Physiotherapy Canada
Rotman International Journal of Pension Management
Seminar: a journal of Germanic studies
The Tocqueville Review
Toronto Journal of Theology
Ultimate Reality and Meaning
University of Toronto Law Journal
University of Toronto Quarterly
Yearbook of Comparative Literature