

To the Finnish Council of University Rectors

Reference: your request for commentary 31.1.2008 (Hanna Manner, Ass't Secretary General)

COMMENTARY OF THE COUNCIL FOR THE FINNISH UNIVERSITY LIBRARIES ON THE RECOMMENDATIONS FROM THE EUA WORKING GROUP ON OPEN ACCESS

The Council for the Finnish University Libraries thanks the Finnish Council of University Rectors for the request for comments on the recommendations from the EUA Working Group on Open Access. The comments here have been collected from the members at the beginning of February and they have been discussed at the meeting of the Council for the Finnish University libraries on the 15th of February 2008.

The Council for the Finnish University Libraries sees that it is most important, that the universities have made European-level recommendations concerning scientific open access publishing activities. It is important that the university sector operates as a plaintiff in the matter of open access publishing.

These decisions of the principles and the recommendation of the Finnish Ministry of Education may also have an effect on the operation of other research organizations and outside financiers of the research.

The Council for the Finnish University Libraries considers the recommendations of the EUA Working group on Open Access most recommendable. **However, we would like to direct attention to the fact that the implementation of these recommendations within the universities requires resource allocation to infrastructure services (e.g. libraries and other support services). In the near future it is not expected that open access publishing would reduce the purchasing costs of the scientific digital material or include further savings which could be allocated directly to the infrastructure or allied services.**

Concerning the section titled as "A. Recommendations for University Leadership" we would like to make following remarks:

1.

It is most likely that in the near future the commercial scientific publication and open-access publication shall both be in use. This means for the libraries and universities that both ways of publishing must be funded: on the other hand buying journals and on the other hand paying the publishing fees within OA.

2.

Many universities offer institutional repositories (publications archival services) developed and maintained by the Library. These services need both technical solutions as well as personal local services for the academics and students. Although the technical solutions can be centralized, one must remember that the local services must be funded.

3.

The Finnish repositories aim at the user friendliness and maximal amount of self-archiving. Researches' self-archiving cannot be totally automated. Thus in order to maintain the quality of repositories a library has to ensure quality of the data reposed, which needs additional resources.

The embargoes that are set by publishers are not seen as a technical problem in Finland: publications stored in a repository can be made, if needed, public also only after a certain date. **EUA working group could possibly consider the possibility of proposing some acceptable maximum time limit on “delayed open access publishing”.**

4.

Recommendations concerning IPR and copyright management are subject to the limits set by Finnish legislation and regulations. At the present in Finland the rights of academic staff are stronger than institutions. The Finnish ministry of education is just preparing a report on the copyrights related to staffs' rights, which hopefully also takes into account the views of open access questions.

Originally the author, in most cases a researcher, owns the copyrights of an article. Thus it is important that the academics are aware that they must make such contracts with the publishers that allow parallel publishing. In this the libraries' have a role as educators of information literacy aspects.

Widespread knowledge of parallel publishing requires a working support system within a university. To organize it in universities following actions are needed:

- university-wide commitment or at least imperative recommendation about parallel publishing, which includes the necessary instructions and the reminder “that it is according to the university policy that each researcher holds themselves copyrights for open access publishing of their public funded research articles when making agreements with publishers”
- efficient control system as a part of research reporting or other basic research operations
- support personnel close to customers to advise researchers on storage and copyright questions (researchers on different areas, different operation environments, different open access -practices)
- legal expertise in order to create and maintain FAQ- regulation.

5.

Recommendations are problematic because they **introduce only one way to finance open access -journals even if there are other practices as well.** In addition, this author pays-model, at least in the cases of commercial publishing houses, means certain kind of double payment to the publishers. By paying publishing fee the article is attained for open access publishing, but university and its library get other articles of the journal only by paying the journal package fee. It is, then, not actually a question about real open access. The situation is different in the case of open access journals completely financed by publishing fees (for example PLoS, BioMed Central). With these

journals there are no other expenses than publishing fees, although the fees are then quite expensive.

The Council for the Finnish University Libraries regards important to create in the future practices **where expenses needed for open access publishing should be included in research budgets already when applying funding for a project.** The open access publishing would probably be promoted mostly if the central financiers (in Finland e.g. Tekes, Finnish Academy) required that all the research results and articles from the projects funded by them must be published also by open access –method. Publishing fees of the staff in the university departments should be budgeted to the operational costs of each department.

On the behalf of The Council for the Finnish University Libraries

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