

Targeted consultation: NHMRC's draft *Open Access Policy* and *Open Access Policy – Further Guidance*

Please complete the table below with your feedback and return via email to quality@nhmrc.gov.au by **5.00pm AEDT Wednesday 5 May 2021**.

Name	Min Ku
Institution	Australian Society of Medical Imaging and Radiation Therapy
Position	Professional Standards Manager
Is this feedback on behalf of an individual or institution?	An Institution
Feedback on the <i>Open Access Policy</i>	
Section 3. Definitions	ASMIRT welcomes the opportunity to work with the NHMRC to ensure that there are a set of consistent definitions applied, to fully encompass the diversity of today's scholarly publishing ecosystem and include choices for all authors.
Section 4.1 Publications	<p>ASMIRT notes the NHMRC's interest in strengthening research communication. ASMIRT strongly supports the maintenance and sustainability of Australian research and welcomes the opportunity to work with the NHMRC collaboratively. The current proposed policy suggests that further consultation and discussions are required to ensure the sustainability of a diverse research ecosystem. We encourage NHMRC to reconsider its approach and work in partnership with the stakeholder community to explore these important issues in a careful and thoughtful manner.</p> <p>The existing NHMRC open access policy for publications was designed to meet the needs of all research stakeholders and is the basis of the unprecedented investments and innovations in the scholarly communication ecosystem. These investments and innovations are providing greater choice to authors and readers. Under current policy, all peer-reviewed publications arising from NHMRC supported research are made freely available, and authors, institutions and publishers are leveraging innovative models to expand uptake of immediate open access options.</p> <p>Proposals to narrow the options available for the publication of scholarly articles by removing the 12-month embargo period on Accepted Manuscripts, subjecting Accepted Manuscripts to licenses that undermine the scholarly communication ecosystem, and introducing requirements that restrict author's rights raise profound and concerning questions that have yet to be discussed, analysed or answered in this consultation.</p> <p>Beyond the rights of authors, unnegotiated license rights and uncompensated work will make it difficult if not impossible for many journals in Australia and abroad to publish work that the NHRMC funds. The proposal mandates that publishers/societies donate the work done between the point of submission of a manuscript and its acceptance for free to the Government. That would require publishers/societies to subsidize the creation and distribution of a</p>

	<p>competing product to that which publishers offer in the market and to make that competing product available for free.</p> <p>Australia’s research and education community seek to promote a more inclusive community. New costs for authors and the proposed mandatory CC-BY release of all NHMRC funded research (either as an ‘Author Accepted Manuscript’ or as a published article) may result in unintended consequences for Indigenous researchers and Indigenous groups</p> <p>ASMIRT’s understanding of the proposal is that under the “green” open access model the aim is to remove embargo periods thereby eliminating intellectual property rights. Mandating immediate deposit into a repository effectively creates a competing, free product (benefiting from the work done during peer review) that will have a negative impact on subscriptions and, in turn, journal financial sustainability.</p> <p>Under the “gold” open access model, researchers will be able to make articles available immediately through payment of article publication charges. The challenge here is that the NHMRC will not provide additional funds to cover these charges during or after the lifetime of a grant. The “pay to play” model significantly reduces the likelihood that authors will have the capacity or inclination to pay to have their work published.</p> <p>ASMIRT supports the notion of open access and open science, however we are cognisant that it must be undertaken in a sustainable way for both the publishers and stakeholders. The proposed NHMRC policy does not support this. To ensure a long-term sustainable ecosystem for the development and distribution of high-quality research, ASMIRT supports a properly funded Gold open access model. ASMIRT believes that this will encourage more authors to publish in open access journals in turn creating growth. ASMIRT encourages the NHMRC to consider the long-term viability and integrity of the scholarly record when developing future revisions to the NHMRC open access policy.</p>
Options for application of this Policy for NHMRC grants commencing prior to 1 January 2022 (Option A or Option B)	<p>The proposed policies presented demonstrate a need to undertake further consultation with stakeholders. The imposition of additional requirements on researchers including cost of publication will need to be addressed by the NHMRC.</p> <p>As such ASMIRT recommends that all grants remain subject to existing policy (Option A).</p>
<i>Feedback on the Open Access Policy – Further Guidance ‘Frequently asked questions for publications’</i>	
FAQ 4	<p>ASMIRT understands that the NHMRC intends to continue to adhere to the existing policy of reducing burdens to authors by not requiring them to deposit copies of their articles if they will be openly accessible through a publisher or other repository. In light of concerns on the proposed changes to publication embargoes, any changes to this FAQ and the timing with regard to the deposit of the publication metadata, its URL/DOI and affiliated NHMRC Grant ID should also be considered as part of this broader policy discussion.</p>
FAQ 5	<p>ASMIRT acknowledges that the NHMRC intends for publications to be made openly accessible in appropriate venues and not through platforms that do not follow basic standards. ASMIRT are concerned that the removal of “publisher copyright requirements” from the FAQ’s in the proposal may eliminate copyright and require repositories to implement this through support for “rights retention through open licensing (CC BY)”. This is a significant change that will require formal cost-benefit analysis.</p>

FAQ 8	<p>Preprints represent an important development in research communication and there are diverse and evolving views across authors and disciplines as to their appropriate role.</p> <p>ASMIRT highlights this as an area where NHMRC can engage with stakeholders to explore different views and discuss how voluntary practices as outlined in this FAQ can promote greater sharing in appropriate contexts.</p>
FAQ 9	<p>Creating restrictive mandates on authors may lead to compliance implications. ASMIRT have concerns that the addition of further restrictive policies that need to be actioned immediately upon publication will further compound the burdens placed on authors.</p>
FAQ 11	NIL
FAQ 12	<p>ASMIRT understands that the proposed policy will impose an array of complex and costly new burdens on authors. The requirement for “immediate deposit upon publication” will only further compound the compliance challenges placed on Australian researchers.</p>
FAQ 13	<p>This FAQ clearly defines the categories of repositories that are acceptable for publications, including publisher websites and open access journals.</p> <p>ASMIRT suggests that the NHMRC evaluate the burdens that the new open access policy proposal would place on authors and work with stakeholders to explore ways to minimize burdens.</p>
FAQ 14	<p>ASMIRT appreciates the complexity of licensing issues and subsequent implications to academic freedom, integrity of the scholarly record, sustainable publishing models and intellectual property (across all cultures). ASMIRT recommends that the NHMRC conduct significant dialogue with the Australian government and academic community on this issue.</p> <p>ASMIRT have concerns that the application of this policy retrospectively for already funded NHRMC grants would also require researchers to retrospectively obtain informed consent from research participants for the publication of articles under a CC-BY license as this is ‘best practice’. This may increase the risk of identifying participants.</p> <p>It is ASMIRT’s understanding that all creative commons licensing choices preserve access for readers and enable reuse of the knowledge contained in each publication. ASMIRT recommends that authors maintain the option to make these choices themselves.</p>
FAQ 15	<p>ASMIRT believe that publishers are committed to partnering with Australian authors and institutions to enhance dissemination of knowledge. ASMIRT encourages collaboration to achieve the desired outcomes of the proposed open access policy.</p>
FAQ 16	<p>ASMIRT would like to ensure that this specific FAQ informs authors clearly about NHMRC requirements and their potential impacts on investigator rights and publishing choices</p>
FAQ 18	<p>ASMIRT fully support Australia’s research enterprise and ability to compete globally. To this end, research collaborations should be as uncomplicated with as minimal challenges as possible.</p>
FAQ 19	<p>Funding is a significant part of any research activity for both the research as well as the publication aspect.</p>

	<p>Funding mechanisms need to be assessed in order to ensure investigators have the resources they need to publish during and after the lifetime of a grant. Researchers should not be disadvantaged from publishing or being unable to publish in their journal of choice as a result of lack of funding money to publish.</p> <p>ASMIRT encourages evaluation of the potential funding implications, with collaboration with all stakeholders to develop appropriate funding mechanisms.</p>
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