



Queensland University of Technology

Response to NHMRC on the draft Open Access Policy and Open Access Policy – Further Guidance

Queensland University of Technology (QUT) welcomes the opportunity to comment on the draft Open Access Policy and Open Access Policy – Further Guidance.

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| Name | Prof Christopher Barner-Kowollik |
| Institution | QUT |
| Position | Deputy Vice-Chancellor (Research) |
| Is this feedback on behalf of an individual or institution? | An institution |
| Feedback on the <i>Open Access Policy</i> | |
| Section 3. Definitions | <p>Open access/Openly accessible:</p> <p>Suggest using only open access and removing “Openly accessible” from the definitions as that can be a confusing term and amending other text from:</p> <p>“Usually manuscripts will have an appropriate licence, such as any of the options available through the Creative Commons suite of licences.”</p> <p>To: “Manuscripts should have a Creative Commons Attribution (CC-BY) licence applied”</p> <p>Paid open access program. Suggest amending from:</p> <p>“Where the authors of a paper pay an ‘article processing charge’ to the publisher to make their publication openly accessible. This is sometimes referred to as ‘gold’ open access.”</p> <p>To:</p> <p>“Where a fee is paid to make an article open access, such as through an ‘article processing charge’, transformative agreement or other payment that is paid to the publisher by the authors or another party (e. g. an institution).”</p> |
| Section 4.1 Publications | <p>QUT welcomes the proposed changes to the policy regarding immediate open access through the VoR or the AAM.</p> <p>Metadata. Suggest changing this section to clarify:</p> <p>From:</p> <p>“The metadata for a peer-reviewed publication must be deposited immediately upon publication without any embargo period via a repository.”</p> |

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| | <p>To:</p> <p>“The metadata for a peer-reviewed publication must be deposited ideally immediately upon publication without any embargo period via an institutional repository, but at the latest within three months after publication.”</p> <p>Rationale – the institutional repositories are the key places which are critical for tracking NHMRC funded research via metadata.</p> <p>However, repositories are dependent on indexing services providing the metadata and this does not happen immediately. It would not be a good use of time to bypass these services to require manual deposition of metadata.</p> |
| Options for application of this Policy for NHMRC grants commencing prior to 1 January 2022 (Option A or Option B) | QUT supports option B to more rapidly facilitate the transition to immediate open access. |
| Feedback on the Open Access Policy – Further Guidance ‘Frequently asked questions for publications’ | |
| FAQ 4 | Agree with wording |
| FAQ 5 | <p>Suggest amending text from</p> <p>No. Scholarly communications networks (e. g. ResearchGate, Academia.edu) are social networking platforms and are not acceptable repositories for the purposes of this policy as they may not provide the appropriate support for long-term storage, curation and/or rights retention through open licensing (CC BY) of Author Accepted Manuscripts or Version of Record.</p> <p>To:</p> <p>No. Scholarly communications networks (e. g. ResearchGate, Academia.edu) are social networking platforms and are not acceptable repositories for the purposes of this policy as they do not provide the appropriate support for long-term storage, curation and/or rights retention through open licensing (CC BY) of Author Accepted Manuscripts or legal copies of Versions of Record.</p> |
| FAQ 8 | QUT welcomes this support for preprints but notes the importance of ensuring that preprints are properly denoted as non-peer reviewed and hence can only be considered preliminary versions and not as substitutes for peer-reviewed publications. |
| FAQ 9 | Suggest amending ‘upon publication’ to reflect time of first posting. QUT are aware of publishers taking in excess of 18 months between first posting an “Epub ahead of print’ and the official print publication date. As it stands this policy would allow publishers to keep the Epub behind a paywall for a period of time and thus delay the date when OA was available. |
| FAQ 11 | See comment under section 4.1 |
| FAQ 12 | See FAQ 9 |
| FAQ 13 | <p>We think examples of repositories would be useful here, especially for</p> <ul style="list-style-type: none"> • Subject repositories • Open access repositories |

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| FAQ 14 | Agree with wording |
| FAQ 15 | Suggest adding wording to reinforce this fully complies with Australian law. In addition a recent post by cOAlition S uses these words that may reassure authors: “The manuscript – even after peer-review – is the intellectual creation of the authors” |
| FAQ 16 | <p>It is notable that some publishers (see blog post referenced in FAQ 15) are seeking to make the process for OA via AAMs difficult and it is conceivable in the future some may refuse to publish papers that are not paid OA.</p> <p>Perhaps reword this section to note it is in alignment with cOAlition S and then could possibly use text such as this below:</p> <p>“cOAlition S recognises that publishers have the right to reject submissions from authors who indicate that they will comply with their funder’s policy and immediately share their AAM. To that end, in July 2020 cOAlition S contacted over 150 publishers to clarify their position with respect to the Rights Retention Strategy. Not a single publisher responded that they would reject a submission on the grounds that the author has applied a public copyright licence to the AAM.”</p> |
| FAQ 18 | Agree with wording |
| FAQ 19 | Agree with wording |

Additional comments:

QUT supports this move to immediate open access for NHMRC funded research and will support its researchers in complying with the proposed new policy. We would very much welcome the ARC taking the same approach and urge the NHMRC and ARC to fully align their open access policies as soon as possible.

QUT would welcome clarification on whether this policy applies to research funded through the MRFF.

QUT would welcome a specific statement in the policy on the importance of ensuring quality in research publications, and specifically publication in reputable journals.

QUT recommends that a monitoring mechanism is put in place, both for compliance with the policy but also to monitor any claims of deleterious effects.

Should you wish to do so, in the first instance please contact:

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