

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

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Position	President
Is this feedback on behalf of an individual or institution?	Institution
Feedback on the <i>Open Access Policy</i>	
Section 3. Definitions	What is meant by CC-BY and other forms of CC (see recommendations below) should be included in the definitions. A link to Creative Commons Australia will help authors to understand the differences and select which version of CC applies to their work.
Section 4.1 Publications	<ul style="list-style-type: none"> ● CC-BY – STA supports the use of CC licencing to ensure author control of their work, but we recommend that the NHMRC allow flexibility to authors. Specifically, STA suggests that the NHMRC allow the options of CC-BY-ND and CC-BY-NC to authors. CC-BY-ND would prevent others from changing or manipulating work in any way while CC-BY-ND ensures that work can be shared for non-commercial purposes. This change still allows for open-access to be achieved while maintaining ownership and integrity of the research in question. ● We agree with the principle that there should be no embargo for publications resulting from government research funding, such as that from the NHMRC. Publications should appear in institutional repositories as soon as practical. ● In the interest of reducing burden on researchers and supporting automation, the 'immediacy' of content appearing on repositories should be linked to the date they appear on standard journal databases such as Scopus or Web of Science. ● STA supports the use of repositories in institutions such as those in university libraries and the National Library to house research. There is a concern however that some institutions/researchers that receive NHMRC funding are not necessarily associated with a university. STA recommends taking this into consideration by highlighting repositories, like Trove, which Medical Research Institutes can access, as well as creating agreements with university libraries. ● A concern raised by many researchers is the cost of publishing in open access journals. While out of the scope of this policy, STA would like the NHMRC to keep this in mind regarding future grant application budgets. We are aware money is already spent on journals through subscriptions but moving to open access risks shifting the cost of publishing to researchers not institutions. These costs may be prohibitive to some researchers if not included in grant funding. ● STA's final concern is the risk of negative effects on smaller publishers. Some research member societies, for example the

	<p>Australian Vascular Access Society, derive their income from publishing and these societies, in-turn, provide valuable support to researchers. Unlike larger publishing houses they may not have had the opportunity to adapt to an open access business model (due to 5-year partnerships etc). Again this may be outside the scope of this policy but it is something to consider in the move towards open access publishing.</p>
Options for application of this Policy for NHMRC grants commencing prior to 1 January 2022 (Option A or Option B)	STA recommends option B. Noting that option A aligns with the policy laid out by the Australian Research Council, STA considers option B as the logical next step in open access.
Feedback on the <i>Open Access Policy – Further Guidance</i> ‘Frequently asked questions for publications’	
FAQ 4	STA recommends that it would be better to use the time which articles appear on standard journal databases (like Web of Science) rather than immediately. If a specific time frame is needed, STA would recommend defining this as “no later than 3 months”.
FAQ 5	Not everyone will know what a repository is (especially medical research institutions that are not aligned with a university) - so it would be wise to include some examples or a list of suitable repositories.
FAQ 8	No comment
FAQ 9	No comment
FAQ 11	We note that Q 11 refers to a “short-delay”, as we outlined in Section 4.1 on publications it would be useful to identify what is meant by a “short-delay”. STA suggests clearly stating that must be by the date the article appears on standard journal databases (typically 3 months) and allows for a short delay.
FAQ 12	As with FAQ 11
FAQ 13	No Comment
FAQ 14	As STA has recommended in Section 3 it would help researchers with no experience in creative commons to define what this means and what their different CC licenses are. A very basic explanation with a link to Creative Commons Australia would be sufficient for this.
FAQ 15	No Comment
FAQ 16	No Comment
FAQ 18	No Comment
FAQ 19	<p>STA supports allowing the publishing fees for research to come out of grants. Some researchers, however, may be concerned that if they increase their grant budget requests to allow for these fees, they may be disadvantaged.</p> <p>To prevent the possibility or perception of bias, it would be prudent to also mention that future grants will not be penalised for anticipating publishing costs in their application. Even better would be to align approaches between the ARC and the NHMRC, where the former allows publication charges to be included in the budget with justification.</p>