



Canadian Society for Brain, Behaviour and
Cognitive Science

Société Canadienne des Sciences du Cerveau,
du Comportement et de la Cognition

December 11, 2013

Dear NSERC Executive,

I am writing you on behalf of the Canadian Society for Brain, Behaviour, and Cognitive Science (CSBBCS), in response to the Draft Tri-Agency Open Access Policy. We shared the consultation documents with our membership and their feedback helped shape the opinions we express below.

The preamble to the consultation document states that the principle of academic freedom guides the Agencies in promoting open access to research publications. Yet this policy would effectively dictate the journals in which researchers can publish (either open access journals or those that allow archiving in a repository within 12 months of publication), and thus restricts academic freedom. To offset this restriction, we encourage the Agencies to work with publishers to harmonize policies on archiving, so that researchers are not limited in their choice of research outlets.

The most frequent concern expressed by our members regards the fact that while grant funds can be used to pay open access fees, there is no concomitant proposal to increase the average size of NSERC grants to offset these costs. As such, any diversion of grant funds to open access fees means fewer funds available for other essential items: HQP costs (trainee stipends, travel, and research expenses), research supplies, and equipment. Members feel that their grant funds are already stretched very thin, and that if open access fees are to be included in grant budgets there must be an increase in average grant size to offset these new costs.

Our members are also concerned that open access fees are unregulated and quite variable. We think it important that funding agencies monitor open access fees and work with publishers to help ensure affordability for all researchers, even those with very modest grants.

Given the costs involved in open access publishing, and the negative impact these costs will have on other grant-supported research activities, our members also wondered why the open access option is listed in the draft policy as Option 1. That is, why not list the option that does not require grant funds (archiving in a repository) as the first choice? We think this is a reasonable suggestion, and encourage you to give it consideration.

We agree that research benefits when results are easily accessible to other researchers, to the public, and to policy makers. We are not sure, however, that the public wants this access at the expense of other critical research expenditures. The draft policy could be seen by some as encouraging the diversion of grant funds to for-profit publishers of open-access journals. As such, we encourage you to carefully consider the consequences of its implementation for Canadian researchers.

If I can provide any clarification or elaboration on the points raised here please do not hesitate to contact me.

Sincerely,



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President

Central Office • Siège Sociale

CSBBCS/SCSCCC

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