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**From:** Sally Morris (ALPSP) [mailto:sally.morris@alpsp.org]

**Sent:** Thursday, November 17, 2005 5:06 PM

**To:** WATSON BROWN Adam (INFISO)

**Subject:** Consultation on Competitiveness in the European Publishing Industry

Dear Mr Watson-Brown

I apologise for missing the deadline for responses on this consultation. I represent the international trade association for not-for-profit publishers and those who work with them; we have approximately 320 members worldwide, predominantly in the EU.

We support the submissions which you have already received from the Digital Content Forum and the Department of Trade and Industry. However, I would like to add just a few points of our own:

- The activities of our publisher members are focused primarily on the publication of research journals - between them they publish some 8000 journals in total. This is an important but relatively invisible part of the publishing sector, which contributes significantly not only to sales and exports, but also to the health of the research community. Of the 20-24,000 scholarly research journals in the world, up to half are published by or on behalf of not-for-profit organisations, and Europe is both the cradle of journal publishing and also still a very significant centre of activity.
- The future survival of research journals is being threatened by the growth of policies whereby research funders request (or require) their grant recipients to make a final version of their research articles (incorporating the benefits of the peer review and other work done by the publisher, and of association with the journal's 'brand') freely available in a publicly accessible repository. As the quantity of freely available articles grows, demand for the published journals in which they finally appear (and which have invested considerable expense in creating, developing and marketing the journal in the first place, and in managing peer review and refining and editing the content for publication) will inevitably decline. We believe that it is important for some controls to be placed on these policies (for example, requiring - as the policy of Research Councils UK does - that deposit may only be carried out in compliance with the copyright and pre-publication policy of the publisher) in order to protect the important and valuable research publishing industry
- Open Access is a popular topic at the moment. It can mean two things - posting by authors of their articles in repositories, as mentioned above, and publication in journals which are free to the reader, being funded by some other mechanism such as publication payments by or on behalf of the author, or grant or other subsidy. Our Association recently carried out a major study of the latter (in association with two US organisations) - the findings are freely available at <http://www.alpsp.org/publications/pub11.htm>. The findings suggest that the Open Access publishing model has not yet been demonstrated to be financially stable; this and other studies make clear that it is not an appropriate model for all journals and in all circumstances.
- Copyright is under attack from several quarters, such as the attempts by Google in the USA to overturn the idea that copying may not be done without rightsholders' permission, the German document supply operation Subito which is supported by the Government and pays only minimal fees to rightsholders, and many in the 'Open Access' movement who feel that the products of taxpayer-funded research should be freely available irrespective of the value added by intermediaries such as publishers. Without a strong and consistent copyright regime, the valuable creative work of authors and publishers would be seriously impaired; this would be a loss both to the member states' economies, and to scholarship.
- The development of a flourishing electronic publishing industry is being hampered by the fact that full-rate VAT is charged on electronic publications, whereas a lower rate is payable on print publications. This is leading publishers to adopt pricing models which bundle electronic journals, for example, with their print equivalents to minimise the tax burden on customers, even though it is in the interests of both publisher and library to migrate to electronic-only

subscriptions. The competitiveness of European publishers vis-a-vis their North American and other competitors is hampered by this situation.

Yours sincerely

Sally Morris

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