

**French Publishers Association's submission  
On the European Commission's consultation  
on the directive on re-use of public sector information**

*The French Publishers Association (SNE) is France's trade association of book publishers. It represents approximately 670 member companies whose combined business endeavors account for the bulk of French publishing and whose total turnover was close to 3 billion € in 2016 (4 billion € expressed at the retail selling price). The SNE represents the French publishing profession as a member of the Federation of European Publishers (FEP) whose position on this initiative it fully supports.*

The French Publishers Association (Syndicat national de l'Édition/ SNE) would like to complement its response to the online questionnaire **on the directive on re-use of public sector information** so as to provide a more subtle answer to **question 12a**:

***“Do you agree that scientific research results (publications and research data) resulting from public funding should in principle be open access (free of charge online access and unrestricted reusability)?”***

One should distinguish between raw research data (not copyright protected) and copyright protected texts in which they may be included. Researchers may not have access to the former, as they are not always available in open access nor independently from the related texts. Public authorities should encourage the making available of scientific raw data in open access and as well as their structuration.

However as far publications are concerned, “open access” should not be presented as a principle, but only as a model among others whose implementation should be subject to a concertation with all stakeholders including publishers. Indeed publishers depend on the exclusivity of the publication of an article to get a return on their investment.

Therefore publications resulting from public funding may only be made available in open access according to contractual conditions or specific agreements and as long as the costs of the necessary publishing and dissemination work are financed upfront.