RESPONSE FROM THE UK JOINT INFORMATION SYSTEMS COMMITTEE TO THE EUROPEAN COMMISSION “STUDY ON THE ECONOMIC AND TECHNICAL EVOLUTION OF THE SCIENTIFIC PUBLICATION MARKETS IN EUROPE”

1. The Joint Information Systems Committee (JISC) is the UK agency charged with assisting “further and higher education by providing strategic guidance, advice and opportunities to use Information and Communication Technology (ICT) to support teaching, learning, research and administration” (www.jisc.ac.uk).

2. The JISC welcomes the Commission’s “Study on the economic and technical evolution of the scientific publication markets in Europe” (hereafter referred to as the “Study Report”) and supports the Recommendations in the Study Report to “enhance access to research output” and to “prevent strategic barriers to entry and to experimentation” (page 11).

3. The JISC agrees with the opening statement on page 5 of the Study Report that “dissemination and access to research results is a pillar in the development of the European Research Area”. The JISC has been working to improve the dissemination of and access to UK research results as part of its service to the UK Higher Education and Further Education universities and colleges.

4. The JISC welcomes the factual and quantitative approach to this important topic. The policy Recommendations in the Study Report are derived from sound research. The high quality of the research is maintained in the clear description of the results of the Study. This should give the European Commission confidence in effecting the Recommendations.

5. The “Overview of the market for scientific publishing” in Chapter 2 is valuable in demonstrating the effect upon the evolution of the market of the relationship between author and publisher, between publisher and librarian. The UK experience supports the Study Report’s finding that the inter-play of these relationships has enabled the evolution of a market that is not an “ideal perfectly competitive market”, creating “virtuous circles” for journals and “natural barriers to entry” (page 21). The factors identified in the Study Report as affecting author decisions on publishing are supported by JISC’s own work (see for example the report by LISU on “Trends in Scholarly Communication” http://www.jisc.ac.uk/uploaded_documents/lisu.pdf).

6. The Study Report also shows clearly how this unusual market has developed in respect of journal pricing patterns (Chapter 3). The fact that “an for-profit journal (or for-profit journal article) is on average three times as expensive as an not-for-profit journal (or not-for-profit journal article”, without any clear advantage on quality, supports the importance the JISC has attached to the future of learned society journals which are increasingly under threat (see the report by Mary Waltham on “Learned Society Open Access Business Models” http://www.jisc.ac.uk/uploaded_documents/Learned%20Society%20Open%20Access%20Business%20Models.doc).
7. Chapters 4 and 5 in the Study Report are valuable in showing how market concentration arising from authors’ need for publication in high-impact factor journals has been reinforced in the electronic era through the bundling of subscriptions. This conclusion accords with the experience of UK academic libraries, which have sacrificed subscriptions to journals from smaller publishers and purchases of monographs (particularly affecting humanities and social science disciplines) in order to maintain the bundled deals from a small number of large STM publishers. UK libraries have also experienced the “lock-in effects” described in section 5.2.2.

8. The effect of differential VAT rates upon the market, as described in Chapter 6, was also highlighted in the Report from the UK Parliament’s Science and Technology Committee in 2004. The conclusion in the Commission’s Study Report that either solution (a reduced rate for scientific information or a tax-refund mechanism) is within the power of Member States to support is helpful.

9. In Chapter 7 of the Study Report a further issue of concern to the JISC is covered, viz. “the question of the long-term sustainability of the current scholarly publication system and of the ever-increasing amount of public money necessary to provide access to publicly funded research results”. Open access alternatives to the current model are discussed helpfully, and changes in the scholarly publishing system placed in the context of the need “to allow for an optimal degree of dissemination, and influence of, European research”. The JISC supports the conclusion in section 7.5 that “ICTs offer opportunities to develop new scholarly communication systems that serve researchers, research users and research funders more effectively, and which increase returns on R&D investment and enhance innovation”. The JISC itself is supporting such developments both within the UK and in collaboration with other European partners.

10. The important issue of long-term access to preserved copies of journals – covered in Chapter 8 of the Study Report – is a matter of great concern in the UK. The JISC is investing in technical solutions to long-term conservation, but the Study Report rightly points to the legal complications in the context of licensing rather than outright purchase of content from publishers. Sensible recommendations are made in the Study Report to enhance the role of “not-for-profit long-term preservation journal archives”.

11. Chapter 9 of the Study Report rightly points to the importance of standards and interoperability if the benefits from access to scientific research results are to be realised. The JISC has led many UK initiatives in this area and is collaborating with a number of partner organisations in other countries.

12. The JISC welcomes all the Recommendations in Chapter 10 of the Study Report and encourages the Commission to work towards their implementation. In particular:

- “Recommendation A1. Guarantee public access to publicly-funded research results shortly after publication”. This Recommendation is in line with the Recommendations of the UK Parliament’s Science and Technology Committee and support from the Commission will help to transform access to European research.
- “Recommendation A2. Aim at a level-playing field in terms of business models in publishing”. The market dominance of the subscription model used
by the large STM publishers has hindered the exploration of alternative models, and the JISC has been supporting the development of new publishing business models alongside the subscription model.

- “Recommendation A3. Extended-quality rankings of scientific journals”. The narrow nature of existing quality ranking measures has long been recognised and the suggestion in the Study Report of a “quality of dissemination” element is an interesting approach. The JISC and other organizations are supporting a range of promising approaches to research quality metrics, offering the potential for metrics that are “fit for purpose” rather than “one size fits all”.

- “Recommendation A4. Guarantee perennial access to scholarly journal digital archives”. The JISC supports the role of legal-deposit libraries in digital preservation, is interested in the development of more JSTOR-like models and of the standards that underpin these changes.

- “Recommendation A5. Foster interoperable tools to improve knowledge visibility, accessibility and dissemination”. The JISC welcomes the Recommendation both for more research into interoperability issues and for the implementation of linking technologies.

- “Recommendation B1. Promote pro-competitive pricing strategies”. The JISC supports the proposal for promotion by European authorities of measures to reduce the “lock-in effect” of “big deals”, measures which JISC is itself promoting.

- “Recommendation B2. Scrutinize future significant mergers”. There are rumours of further mergers of European publishing houses and JISC supports the concern expressed in the Study Report about the possible effect upon prices of such mergers. Scrutiny at European level may be more effective that similar exercises at national level.

- “Recommendation B3. Promote the development of electronic publications”. The support of the Commission in encouraging Member States to end the unfavourable tax treatment of electronic publications could be valuable, as could the funding of digital archives at a European level.

- “Recommendation C1. Setting up an advisory committee.” The issues identified in the Study Report will be ongoing issues for some years, and a stakeholder forum at European level could play a valuable role.

- “Recommendation C2. Further investigation”. The factual basis of the Study Report highlights the need for further policy decisions to be made on such a firm basis. While JISC and various other organisations are conducting research into particular aspects of scientific publishing, financial support from the Commission for research at European level would complement research at a national level.

Yours faithfully

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