



THE SCHOLARLY PUBLISHING  
& ACADEMIC RESOURCES COALITION

21 Dupont Circle NW, Suite 800  
Washington, DC 20036 USA

TEL: +202 296 2296

FAX: +202 872 0884

URL: [www.arl.org/sparc](http://www.arl.org/sparc)

December 20, 2006

Public Support for Science and Innovation  
Productivity Commission  
PO Box 80  
Belconnen ACT 2616  
Australia

Via e-mail to [science@pc.gov.au](mailto:science@pc.gov.au)

Dear Sir or Madam:

I am writing on behalf of SPARC (the Scholarly Publishing and Academic Resources Coalition) to comment on the Productivity Commission's November 2006 draft report on "Public Support for Science and Innovation." Our remarks focus on policies regarding access to peer-reviewed papers and associated data, which are discussed in section 5.7 (Impediments to the functioning of the innovation system: Scientific publishing) of the report. The focus of that finding corresponds closely to the arena in which SPARC's focus and experience are deepest.

SPARC is an international alliance of academic and research libraries and organizations, including the Council of Australian University Librarians. We have been at the forefront of advocacy for public access to research funded by the U.S. National Institutes of Health and have been closely involved in development of the pending Federal Research Public Access Act, introduced in the United States Senate during 2006. SPARC views the dissemination of research findings as an essential, inseparable component of the research process itself.

As I am sure you are aware, steps toward ensuring that publicly funded research is freely available have been initiated in nations around the world, including the U.S., Canada, the UK, and a growing list of others. Their public access policies seek to stimulate and speed scientific discovery and scholarly understanding – while enhancing returns on research investments – by expanding research sharing.

SPARC enthusiastically commends the far-sighted draft recommendation of the Productivity Commission that "published papers and data from ARC and NHMRC-funded projects

should be freely and publicly available” (Draft Finding 5.1). This is an important step that will be welcomed by all beneficiaries of research.

While your recommendation recognizes the tremendous potential to expand the impact of Australian research outputs, we encourage you to go a step further in delineating the kind of public policies that are needed. The experiences of other nations have demonstrated that the effectiveness of well-intended policies can easily be undermined by unnecessarily timid implementations. For example, the *voluntary* public access policy of the U.S. National Institutes of Health, implemented in May 2005, has resulted in deposit of less than five percent of eligible articles in NIH’s digital repository. The agency is now evaluating steps to improve on this unfortunate outcome, but success has been delayed by years.

We believe that, in order to guarantee a better result, it would be useful if your report called for Australian public access policies that fall within these parameters:

- Research funders should include in all grants and contracts a provision reserving for the government relevant non-exclusive rights (as described below) to research papers and data.
- All peer-reviewed research papers and associated data stemming from public funding should be required to be maintained in stable digital repositories that permit free, timely public access, interoperability with other resources on the Internet, and long-term preservation. Exemptions should be strictly limited and justified.
- Users should be permitted to read, print, search, link to, or crawl these research outputs. In addition, policies that make possible the download and manipulation of text and data by software tools should be considered.
- Deposit of their works in qualified digital archives should be required of all funded investigators, extramural and intramural alike. While this responsibility might be delegated to a journal or other agent, to assure accountability the responsibility should ultimately be that of the funds recipient.
- Public access to research outputs should be provided as early as possible after peer review and acceptance for publication. For research papers, this should be not later than six months after publication in a peer-reviewed journal. This embargo period represents a reasonable, adequate, and fair compromise between the public interest and the needs of journals.

We also recommend that, as a means of further accelerating innovation, a portion of each grant be earmarked to cover the cost of publishing papers in peer-reviewed open-access journals, if authors so choose. This would provide potential readers with immediate access to results, rather than after an embargo period.

While SPARC is not in a position to evaluate whether Australian public access provisions should be limited to ARC and NHMRC, we believe the benefits apply to all publicly funded

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research. We urge that your recommendations with regard to public access be framed broadly.

SPARC congratulates the Productivity Commission for recognizing its role in bringing about needed improvements in access to research and stands ready to aid your efforts in any way practical.

Sincerely,

A handwritten signature in black ink that reads "Heather Joseph". The signature is written in a cursive, flowing style.

Heather Joseph  
Executive Director  
SPARC