



March 31, 2025

To: Canadian Institutes of Health Research
Natural Sciences and Engineering Research Council of Canada
Social Sciences and Humanities Research Council of Canada

Re: Draft Revised Tri-Agency Open Access Policy on Publications

On behalf of the members of the Association of Research Libraries (ARL), thank you for the opportunity to provide feedback on the draft revised [Tri-Agency Open Access Policy on Publications](#). ARL is a membership organization representing the largest research libraries in the United States and Canada, which are committed to advancing open access in order to accelerate scientific advances and expand public participation in research. We appreciate the Agencies' commitment to ensuring that the results of federally funded research are openly available without embargo, and commend the selection of an approach that leverages the investments research libraries have made in making accessible and preserving the intellectual outputs of their institutions via institutional repositories.

ARL acknowledges that supporting the deposit of an increased volume of outputs will require additional capacity, and we recommend that the Agencies complement local support for staffing with targeted investments in technology and automation that can further streamline the deposit process. We also recommend adequate resourcing for adoptive or generalist repositories to ensure that all grantees covered by the Policy have options for no-cost deposit regardless of their institutional affiliation.

The Policy appropriately provides for multiple routes to compliance, including the deposit of an article's version of record or the author's accepted manuscript. ARL recommends communicating with publishers directly about the rights that Tri-Agency grant recipients retain with respect to outputs from their funded research, in order to minimize the burden of negotiation on individual authors and build these expectations into publisher workflows as much as possible. When, as a verified matter of policy, publishers or journals prohibit authors from depositing either a version of record or their accepted manuscript in a repository, ARL recommends that the Agencies communicate a regularly updated list of these entities to both grant recipients and research libraries, which may wish to consider support for author rights as part of their broader collections strategy.

Regardless of which version of a manuscript is to be deposited, ARL recommends that the Agencies clarify whether best practices like the use of persistent identifiers and digital accessibility of outputs to

people with disabilities are considered part of compliance with the Policy. And, while ARL applauds the requirement that deposited outputs are to be openly licensed, we invite the Agencies to consider encouraging less restrictive licenses that allow for a wider range of reuse.

Finally, ARL recommends that the Agencies clarify the approach they intend to take to monitoring compliance with the Policy. Research shows that when funder open access policies do not include mechanisms for enforcement, a lower proportion of publications tends to be available open access.¹ Positive steps are being taken at research institutions across Canada to incentivize and build a culture of open scholarship, but transparent disclosure of the consequences for noncompliance with the Policy represents another important element in driving systemic change.

We look forward to continued engagement with the Agencies as the final revised Policy is developed. Please feel free to contact me or my colleague Marcel LaFlamme, Director, Research Policy and Scholarship, marcel@arl.org, with any questions about our feedback.

Sincerely,

A handwritten signature in black ink that reads "Andrew K. Pace". The signature is written in a cursive, flowing style.

Andrew K. Pace, Executive Director

Association of Research Libraries

¹ Larivière, V., Sugimoto, C.R. (2018). Do authors comply with mandates for open access? *Nature*, 562, 483–486.