

Draft Tri-Agency Open Access Policy OCULA and OLITA Response to Consultation Document

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This response is submitted on behalf of the Ontario College and University Library Association (OCULA) and the Ontario Library and Information Technology Association (OLITA), divisions within the Ontario Library Association (OLA).

OCULA and OLITA congratulate the Agencies for moving toward open access for the published results of research funded by the Agencies. OLA is committed to advocating for the democratic right of all individuals in Ontario to have free and equitable access to information. This draft open access policy will help ensure that Canadians, and indeed individuals around the globe, will have increased access to Canadian-funded research findings.

As noted in the policy's preamble, this policy will bring major Canadian research agencies in line with the policies of prominent American and European research agencies. However, we encourage the Agencies to go beyond the current standard for open access policies, and to set policy that will move us even further toward the best possible scenario for disseminating Canadian research. To achieve this, we offer the following suggestions:

- Require immediate deposit of publications rather than providing options where publications are not openly available for the first 12 months of publication (section 3.1). Delaying the open access of publications only serves to put control of the dissemination back in the hands of publishers. We support the inclusion of both options for open access (publisher websites or an online repository) and note that a requirement for immediate deposit would still allow for both options to be made available to authors.
- Expand the scope of the policy with respect to open deposit of research data (section 3.2) to require deposit of data and retention of data sets by recipients of NSERC and SSHRC funding as well as recipients of CIHR funding, in conjunction with initiatives identified in the TC3+ document "Capitalizing on Big Data: Toward a Policy Framework for Advancing Digital Scholarship in Canada." Research data are necessary for transparency and replication of studies, which increases the credibility of publicly-funded research. Open research data can also increase efficiency of research funding. When data sets are available for general use, fewer funds are required to gather data and more funds can be directed to data analysis. Finally, open data sets can be used by non-funded researchers, thereby increasing the overall impact of research funding.
- Expand the scope of the policy (section 5) beyond peer-reviewed journal articles to include book chapters, reports, editorials and conference proceedings.

In general, OCULA and OLITA are very much encouraged by the proposed Open Access Policy and thank the Agencies for consulting the community. Our members look forward to moving forward in a more open research environment and working with researchers towards compliance with the policy.