Independent Science and Partnership Council

CGIAR

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ISPC Comments on the CGIAR Open Access Policy (June 2013 Draft for Review)

Knowledge and its associated products are amongst the major international public goods (IPGs) developed through CGIAR research and partnerships. The CGIAR has traditionally been a leader in placing its knowledge products in the public domain and has, where necessary, resorted to establishing intellectual property protection on its products specifically to prevent others doing so and thus restricting access. Today the majority of public funding for research carries the requirement that products be open access. Many research institutions are developing or refining their policies on public access to their products and this includes many institutions that work in partnership with the CGIAR. Hence the field of open access is evolving rapidly and it is appropriate that the CGIAR keep its policies under review and that it aims to achieve best practice in this domain.

Although the intentions behind ensuring open access are laudable, there are some caveats. For instance, there is a plethora of open access online journals that fail to meet normal standards of peer review and which enable researchers to "publish" poor quality research in exchange for modest page charges. Data of poor quality are not useful IPGs. Requirements to place all data in open access web-based databases can therefore impose high costs on research institutions without achieving any real benefits. So as the CGIAR moves forward with open access it will have to constantly monitor what others are doing, weigh up the costs and benefits of the different options and set priorities.

The ISPC confirms the need for the CGIAR to move to the publication of its data and knowledge-based products according to the principles espoused in the first, introductory, paragraph of the Draft Open Access Policy (OAP). However, the draft policy paper sets forward some but not all considerations required in such a policy. Thus, currently, the draft may be viewed more as a statement of encouragement towards certain principles, but without describing means, limitations, penalties or the potential costs to the CGIAR of embracing Open Access more thoroughly. It has been developed in the absence of two supporting documents (on Open Access Implementation Guidelines, and Data Management Implementation Guidelines, promised for mid-2014). The absence of the analysis and operational prescriptions expected in these two documents limit the present draft to making encouraging statements in a vacuum, so that the paper is rather open-ended and weak as a consequence.

Section 4 in the draft OAP, which contains the substance of the draft policy, presents a very limited or qualified view of open access at the outset, saying *"Best efforts shall be used to make information products Open Access, subject to the legal rights and legitimate interests of stakeholders and third parties, including intellectual property rights, confidentiality, sensitivity (including price and politically sensitive information) and privacy."* A more positive construct could be to assert that, wherever possible, the CGIAR should seek out

arrangements in which it maximizes the access of those who could benefit. The CGIAR is a powerful entity and can insist forcefully on open access with many of its collaborators. Some donors manage to insist that data collected with their funding must be made publicly available; and the CGIAR could do something similar. There will always be exceptions (and we realise that change will be progressive with some partner institutions as they operate under constraining policies), but the presumption should be that collaboration with the CGIAR implies open access; anything else needs to be negotiated and there needs to be a convincing case made that the alternatives have valid justifications.

Some of the language of the draft document actually undermines or weakens the policy. For example, data is supposed to be made publicly available *"as soon as possible and in any event within 12 months of completion of the data collection or appropriate project milestone."* What an appropriate project milestone might be is not clear and arbitrary factors could extend the time period well beyond 12 months. For books and book chapters, the policy says that *"Making the full digital version of books Open Access as soon as possible after publication is encouraged."* This remains vague and should be capable of greater specificity in a document on guidelines than in a policy document.

There is no discussion of enforcement, incentives or sanctions. Having a "CGIAR policy" that does not propose incentives for compliance is not useful. There is no description of which body will monitor the implementation of policy, and how it will be adjudicated or interpreted. There needs to be some review body, probably external to the CGIAR, that can play a role here and the document should describe how this will be done.

Most importantly, the policy makes statements in the absence of a discussion of the budgets needed to implement the approach, and the readiness of the CGIAR to meet the costs. If researchers are meant to make their published papers openly accessible, ideally under the gold standard, this typically requires substantial payments to buy out copyright from publishers. If the CGIAR is serious about this, funds will need to be set aside precisely for this purpose – e.g. sponsoring copy rights' transfers for books and book chapters. Other costs will include the development of databases, appropriate common nomenclatures, data cleaning, processing and quality control, management-maintenance, curation and translation, in order to get data ready for public distribution. There will be system-level as well as CRP charges – and even the latter will mount – e.g. assuming a CRP could publish 30-50 publications a year at a hypothetical cost of USD3,000 per publication. Not all of these charges are new; page charges and other contributions to publication costs were common practice for scientific publishing more than 30 years ago. At that time, this was managed by including adequate budget in all grants to cover these publishing costs. In today's electronic information age we should similarly cost and budget the costs of the open access policy into program budgets. The CGIAR should discuss these issues and costs so that the implications of different approaches can be estimated.

A separate consideration, and one with which the ISPC has a particular concern, is the possibility of instituting incentive systems that might conflict with goals for science quality such as *"encouraging publishing in free or reduced cost access journals/publishers"* that can become a potential disincentive to publishing in "high impact" avenues.

The policy is essentially reactive, considering a modest evolution of current products. It does not take the more aggressive view that the CGIAR could lead international efforts on Open Access data for agriculture. As an example of such a stance we could imagine the need for

additional data products, such as weather, soil and agricultural systems data which may be collected, but not always published. In earlier feedback on the CRPs, the ISPC highlighted the potential benefit of maintaining long-term datasets for monitoring of trends. For instance, a major constraint to improving the extrapolation and use of research results and in making research data more valuable to non-CGIAR users is the lack of good quality, geo-referenced weather, soil, and rudimentary agricultural systems data. If data from all the places where the CGIAR conducts field research and surveys, and has installed a weather station and/or collected soil data to support this work, were made available, this would go a long way to filling in data gaps in key agricultural areas in low-income developing countries. This category of data would have tremendous international public goods import, as might long term household data etc. - although geo-referenced personal data collection brings its own challenges in identification and ethical management.

In the following, our comments relate to specific sections of the policy draft:

Preamble and following; Although the document, as presented, has components of what a policy should be, in many parts it includes components more appropriately suited to the Implementation Guidelines and the Data Management Implementation Guidelines. For example, the policy should strive to provide clear definitions on the "indicative types" or distinct categories of information products but the Implementation Guidelines should specify what falls under the scope of the CGIAR OAP. This would allow for a more efficient updating process, avoiding having to change the policy document frequently, and it can be made clear that, for example, ".. the policy is not intended to deal with X and Y or that all X or all Y are covered by the dispositions of this policy."

The fifth paragraph of p1, the first line *"All CGIAR research programs will implement…"* is more of a finale and could be placed at the end of the OAP. The intent of the policy may be very costly (as discussed above). However, the relationship between a definite start date, a gradual transition (to what end point?) and a "demonstrable implementation" (how demonstrated or measured?) are either in conflict with the fourth paragraph or not very well described.

4.1.2. It would be useful to expand on the nature of "a repository" for this purpose. The meaning of "other sites" is not clear and could be removed.

Secondly, sections 4.1.2. and 4.1.5. could easily be merged;

4.1.3. The section correctly highlights the importance of data quality and impact. But for agricultural research, there is also a rather unique need to define the agricultural system that is targeted by the research and for which the data are relevant. Therefore, we suggest revising the Section 4.1.3 heading to "Quality, Context, and Impact".

4.2.1. The main criterion for choosing a high quality journal is impact in terms of visibility, reaching out and confidence in the rigor of the review process etc., and this is something that the CGIAR should continue to monitor and recognize.

4.2.5. Definitions in a Policy should, axiomatically, be as clear as possible. The meaning of *"meta data of all video and audio outputs"* could be clarified with examples.

4.2.6. The CGIAR should perhaps argue in the forthcoming Guidelines document the implications associated with *"all software produced after the entering into force of the Policy will be treated as open source".*

In summary, the overall intent of the policy draft is valid but the true ambition and difficulties in implementing it are but briefly mentioned and remain undescribed. As well as the ethical intent, this is an important opportunity for the CGIAR to improve Center and CRP capacity and capability in archiving and making project data publically available. This capacity was demonstrated only unevenly in the past, as commented on in the ISPC reviews of social science and NRM in the CGIAR. The policy does not say much about the fact that the CRPs will be collecting data and publishing in collaborative arrangements with other organisations that have open access policies – as the CGIAR cannot automatically impose its policies on others – it may sway them by example (see the fourth paragraph, above) but there needs to be room for negotiation. As the policy states, judgements will need to be exercised and this will all take time – but the policy and lack of background documents do not give much guidance to help decide on choices and priorities.

In consequence, the ISPC suggests that the draft policy on Open Access is revised against stakeholder feedback as a statement of intent, and that a true policy document is put forward only after the concrete drafts of the two expected Guidelines have been similarly reviewed and the consequences of the actions, in terms of purchases and data and policy management have been adequately determined. Only then can the correct tenor of a *policy* document with time lines for implementation, incentives and deterrents be properly crafted.