



Conseil supérieur de la propriété littéraire et  
artistique (CSPLA)  
Mission sur la Science ouverte  
Ministère de la Culture  
182 Rue Saint-Honoré  
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Subject: contribution to the Open Science mission report

The ADBU (Association des directeurs et personnels de direction des bibliothèques universitaires et de la documentation - French Association of academic library and documentation directors and management staff) expresses its regret that a technical messaging issue prevented it from being informed of the hearing dates proposed as part of the preliminary work for the report of the mission commissioned by the CSPLA on Open Science, and requests that the following points be appended to or included in the final version:

- Regarding the analysis of the value creation chain in the academic publishing sector, the report adopts a focus that appears to be overly narrow: the subject could be expanded to take into account research production, whose economic rationality is based on a model rather similar to the venture capital one. In practice, through their funding, public authorities actually "bet" on a certain number of research projects, very few of which, in the end, through their very nature, result in publishable breakthroughs. Even if a study on the subject is lacking and would be worth carrying out, an estimate of the ratio at work is provided in the report p.19, where it is stated that "Elsevier told the mission that 75% of articles submitted were rejected (2.7 million articles submitted and 600,000 published)".

The microeconomic reasoning outlined at the beginning of page 10 of the report would benefit from being reviewed in light of this expanded focus, which does not do justice to the real costs of science for research funders, or to the return on investment of publications.

- The report recurrently voices the fear that the Open Science movement will result in undermining the private sector of academic publishing, whose eminent role in the research reviewing process is aptly underlined (organization of the peer-reviewing circuit, reputational value of journals taking on the role of quality label).

Although this fear may be understandable, given the influence of certain militant views, a balanced presentation of the issue must also take into account the point of view of the players actually in charge, as federated at national level by the ADBU (French association of university library and documentation directors and management staff): the directors of documentation departments in higher education and research (whether they work in universities, organizations or schools) are not aiming for or imagining a plausible disappearance of the current academic publishing ecosystem, over the short, medium or long

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term. The idea of a return to practices that pre-date the appearance of the scientific journal in the 17<sup>th</sup> century, i.e. oral transmission, gloss, or correspondence between scholars, or some sort of new form related to the advent of digital technology, appears highly hypothetical for the reasons described in detail in the report: beyond the act of publishing itself and of disseminating knowledge, the scientific journal plays a key role in the qualitative reviewing processes of research, to which researchers themselves are greatly attached. Moreover, this aspect was perceived from the outset by scholars themselves, as illustrated in the writings of Henry Oldenburg, Secretary of the *Royal Society of London*, who initiated the first scientific journal of History, the well-known *Philosophical Transactions*.

As such, it is worth remembering:

- that Open Science green open access, although this point is rarely perceived, implies the existence of a private publishing sector, as it consists specifically in the open access publication of the double-blind peer-reviewed version of the author manuscript, which implies submission of the said manuscript to a publisher capable of organizing this review process, and to whom the rights to the canonical version of the article are assigned entirely. The open access publication timeframe for this author manuscript version was the subject of intense debate during the preparation of the French Lemaire Act, where the academic publishing world feared that the final timeframe set, from 6 to 12 months depending on the discipline following publication in the journal, would be too short to ensure their economic balance.

The impact study undertaken as part of the mission entrusted to Daniel Renoult completely dispelled these fears. The CSPLA Mission report which, however, cites Daniel Renoult's report several times, does not place enough weight on this key point, which is easy to explain: while the Internet theoretically makes it possible to replace the publisher when it comes to the act of publication, the journal framework remains the guarantor of research reviewing, which explains why academic libraries have continued their subscriptions, despite the assumption of open access publication on repository platforms such as HAL. **To be sustainable, Open Science green open access requires the subscription system.**

Even international initiatives, such as RePEc, which organizes open access publication of economic and management science articles on a global scale, and their submission to peer review, have in no way led to massive unsubscribing from the leading journals in the field: this is because the functions, in RePEc, of this submission to peer review of articles in preparation do not play the same role at all as the one played by publishers' journals. In RePEc, before submitting their article to a journal, authors improve their manuscript through critical peer review, whilst, once submitted to a publisher, the manuscript is subject to a double-blind review, based on the totally different logic of reviewing its scientific quality, in the symbolic and reputational economy system specific to research, where financial benefits always play a second role and do not compete with publishers' interests (obtaining promotions, grants, research contracts, etc.).

For these same reasons, there is no doubt that the Rights Retention Strategy (RRS) which, like the provisions of the French Lemaire Act at the time, is currently causing great concern among publishers, and which is reflected in the CSPLA mission report when it improperly refers to a "rights retention" strategy (the rights to the final version of the article are fully-assigned to the publisher in this approach), has as little impact on the economic sustainability of the publishing sector as the provisions of the French Lemaire Act (with which it shares, it seems worth remembering, the fact that it is applied at the sole initiative of authors, irrespective of the incentive

measures taken by research institutions to promote it): researchers are fiercely attached to their constitutionally-guaranteed academic freedom);

- that Open Science gold open access in no way calls into question the existence of academic journals: it just replaces the subscription-based funding model (known as the "reader-pays" model) with a model based on the payment of APCs (*article processing charges* - known as the "author-pays" model).

As far as this is concerned, the CSPLA mission report does not appear to correctly establish the aims of Plan S, which also caused a great deal of ink to flow at the time: for research funders, it was a question of denouncing and attempting to put an end to the confusion, occasionally deliberately fuelled by some players, as regards scientific publishing funding, with many journal packages mixing subscription-funded journals with APC-funded journals; and even offering journals in which some articles were deemed to be funded on a reader-pays basis, while others required the payment of APCs to be published (so-called "hybrid" journals). It was above all against the hybrid aspect of these packages or journals and the related risk for research institutions to lose control of costs that Plan S intended to react.

Since then, the development of "*Read and Publish*" type agreements (at times incorrectly known as "transformative agreements"), stemming from an overall, integrated negotiation on subscription costs and APC costs, has provided a solution in this respect.

- As regards Open Science diamond open access, the risk of the eventual state control of the private publishing sector, as highlighted by the CSPLA mission report, is one of the most surprising! Because, what exactly does "state control" refer to here? In fact:

- if it means that there is a risk of total or virtually-total publishing sector dependence on public funding, in that case we should not talk about a risk but about a reality: apart from the legal sector and, to a lesser extent (scientific journals should not be confused with professional journals: doctors' surgeries do not produce medical science research) the medical sector, the publishing sector draws most, if not all, its revenue from public funding, in the form of subscriptions taken out by libraries or in the form of APCs paid by research units;

- if the purpose is to highlight the risk that, by not using the intermediation of a private publisher, researchers will become judge and jury of their work and, as such, the outputs of journals published in diamond open access will not offer all the guarantees of scientific quality required, it is worth remembering then, first and foremost, that the withdrawal of articles whose results appeared after publication are insufficiently well-founded, and even tampered with, exists in the traditional publishing sector, and has even tended to increase in recent years, including and above all in the most prestigious journals (and hence the most desirable in the *publish or perish* logic).

Furthermore, the reality of diamond open access publishing needs to be looked at, which the CSPLA mission report simply illustrates through the SCOAP3 model; whereas the model implemented as part of the SCOAP3 initiative is highly-particular and related to a very specific research sector.

The majority of diamond open access publishing initiatives are instigated by universities through the introduction of publishing platforms where the roles assigned to each contributor are just as formalized and hermetic as in the classical publishing circuit: scientific advisory committee playing the role of editorial committee, totally independent

of reviewers, who are always from outside the institution and even from abroad, and who ensure the value of the work produced through a rigorous, anonymous double-blind review process.

Moreover, far from competing with the private publishing sector, these academic platforms more often than not act as incubators for journals, some of which, once they have reached a certain level of readership and maturity, are approached by private players and join the classical publishing sector. Far from being a threat to bibliodiversity, these platforms actually fully contribute to it.

And none of the academic players in charge imagine that, as such, this model may one day replace the private publishing sector.

If ever schizophrenia exists, it is not to be found on the State side as the mission report affirms p. 68.

It would be much more accurate to speak of divergent interests, not between the worlds of culture and higher education and research, as library curators, largely employed by these two French Ministries, are well aware, but between, firstly, globalized and highly-financialized publishing players, which have been making double-digit profits for decades and, secondly, smaller publishers, particularly French ones, which, as a result of the increases in the large packages published by the international giants of the sector, have suffered to their disadvantage, as the mission report highlights in p. 22, from the reallocation of budgets by research institutions forced to sacrifice specific titles in order to maintain their subscriptions to packages from the world's leading scientific publishers in spite of the ongoing and unjustified rise in costs of the latter.

**Bibliodiversity's enemy is not open access.**



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*ADBU is the French Association of academic library and documentation directors and management staff. In the knowledge and information transformation system, the ADBU conveys the vision of an academic library (UL) with a strong societal role. The ADBU focuses on the strategy and development of scientific and technical information and constantly questions the role of ULs in society, in an open-minded and audacious manner. The ADBU tackles preconceived ideas and fully reasserts the role, missions, ambition and values of academic libraries. University libraries, spaces for sharing and discussion, overflowing with ideas, intellectual capital, achievement and innovation, are pioneers in higher education and research for disseminating digital knowledge and for knowledge sharing. They play a key role in students' success and research.*