

Analysis of the potential impact of the proposed Office of Chief Scientist Open Access model on the ‘long tail’ of journal publishers

Professor Duncan Ivison
June 2022

A report prepared for the Office of the Chief Scientist

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Executive Summary

1. The academic publishing market for journal articles in Australia is highly concentrated. Fifteen publishers are responsible for publishing 75% of Australian authored articles in the sample period between 2011-2020. The remaining 25% of articles are spread across a long tail of ~4000 publishers.
2. Preserving *bibliodiversity* should be a key principle of Australia's OA model. Many journals represented in the long tail publish important work by Australian authors in areas of significance for Australia and our region that might not be well represented in the more mainstream and disciplinary specific global journals. This is particularly important for HASS disciplines, but also more Australian specific research domains in ecology, agriculture, environmental sciences etc.
3. We segmented the long tail into six sections and sampled 23 publishers to understand the nature of the publication activity and the kind of journals Australian authors are publishing in during the sample period. There are at least four kinds of publishers represented in the long tail: (i) small and medium sized commercial publishers; (ii) university and faculty publishers; (iii) professional and disciplinary associations and societies; (iv) government departments/research organizations.
4. There is considerable high-quality work being published in the long tail. Of the 23 publishers sampled, almost all published ERA recognized journals and many of the journals were cited extensively in the 2018 ERA submission.
5. There are a variety of business models reflected in the different publishers in the long tail. Many bundle subscriptions into membership fees (professional and disciplinary associations); some receive additional funding from philanthropy, universities, or government departments; many have subscriptions for individuals and institutions, including hard copy sales; some receive revenue from Copyright Agency educational copying fees. The proposed OA model may impact those business models to varying degrees. There are risks for journals reliant on membership fees and subscription income if they are not able to recoup those fees from new read and publish agreements, or through other means (including reductions in costs). APC charges may also present an obstacle for Australian authors not based in universities and who lack access to funding for publishing their work (e.g. health care professionals, researchers in the public service, etc).
6. All the publishers sampled had at least some kind of digital version of their journal, along with digitally based submission processes (to varying levels of sophistication).
7. Special attention should be paid to ensuring Aboriginal and Torres Strait Islander research remains supported through the publishers represented in the long tail. There are also existing obligations for researchers working with Aboriginal and Torres Strait Islander communities, including in relation to the publication of research outcomes. Further consultation with community and relevant publishers (e.g. AIATSIS) is required. Any OA model must respect the principle of self-determination for Aboriginal and Torres Strait Islander communities.

8. University IP policies may vary in ways that have consequences for a national OA model which will require further investigation. Also, there is a need to align OA arrangements with those for statutory licenses for educational copying to avoid universities having to double or triple pay for their researchers' work, especially for educational activities (e.g. copyright licenses are based on student enrolment, not usage).
9. University libraries use third party providers to manage their subscriptions with the long tail of publishers. The proposed OA funding arrangements will need to preserve the ability of university libraries to continue to fund these subscriptions.

1. Introduction

The Office of Chief Scientist (OCS) is developing a model for supporting Open Access (OA) research in Australia. The fundamental objective is to make Australian research – initially, research published in peer review journals - freely available to all Australians, including governments, industry, and the broader community. The purpose for doing so is to increase the dissemination and use of Australia's publicly funded research, and in doing so, improve research collaboration, innovation and ultimately Australia's economic, social, and cultural well-being. It will also help maintain and improve Australia's global position in research and innovation, by making our research more easily available nationally and globally. A large proportion of published Australian research – and especially journal publications - remains behind paid firewalls, which makes it difficult to access by those outside of Australia's universities, or those without access to major research institutions.

More generally, publishing high quality, publicly funded research should not rely on ability to pay, either by individual researchers, or institutions.

The proposed model includes a central implementing body that would negotiate comprehensive, national read-and-publish agreements with publishers on behalf of all Australian stakeholders (including universities, PFRA, government departments, industry etc). These agreements would cover read access for Australian users (e.g. subscription fees), and costs associated with publishing Australian journal articles as open access (e.g. article processing charges).

The purpose of this report is to consider the potential implications of the model for Australian research that appears in outlets outside of the dominant publishers such as Elsevier, Wiley, Springer-Nature, and others.

We will consider:

- (1) the potential consequences of the proposed model for smaller and more specialised publishers that Australian researchers are currently publishing in. Are there any risks that the model poses for this cohort of publications and thus for the dissemination of research by Australian researchers?

- (2) any specific consequences or risks that the proposed model presents for authors publishing in the humanities and social sciences (HASS), or in more specialized fields across all disciplines, or for Australian focused research.
- (3) any other insights on the proposed model and how it might impact Australian researchers and publishers.

If the goal of the proposed model is to improve the dissemination of Australian research, as well as contribute to greater collaboration and innovation between Australian researchers and the broader community, then it's important that the model preserve and enhance the diversity and quality of Australian research being published. There is strong evidence that diversity in research approaches, methodologies and outputs supports greater innovation and quality of research outcomes.¹

Thus, an important principle for the OCS to consider throughout this process is ensuring the model supports Australia's 'bibliodiversity'.² Bibliodiversity is cultural diversity applied to research and scholarly production and dissemination. It is a crucial condition for ensuring research occurs on a wide variety of topics, from a range of different perspectives and methodologies, and that addresses diverse audiences. It would be problematic if, because of the implementation of the proposed model, smaller and more specialized publishers were not able to sustain themselves, especially in domains where Australian research currently excels, or where it has particular importance and resonance for Australia and our region, and which is unlikely to be adequately supported by the large global publishers. Multidisciplinary and multi-paradigmatic research, research carried out in local and regional languages, and research done in relation to the specific histories, topographies and cultures of our country and our region, is often less likely to be published in mainstream, discipline-dominated, global publishers. Smaller and mid-size national publishers are more likely to publish emerging research in areas of local concern and interest. This is particularly true for publishers publishing in languages other than English. Researchers also often seek to publish their work in venues that reach more diverse audiences than exclusively academic ones. One significant benefit of the OA proposal is that it will reduce barriers for the broader community (and not only industry) to access scholarly research outputs, which in turn can help promote the value and visibility of Australian research, and especially basic research.

It is also important to ensure that high quality research that is currently being published in the long tail – for example, publications included in Australian university Excellence in

¹ See for example Jones, R. and Wilsdon, J.R. orcid.org/0000-0002-5395-5949 (2018) *The Biomedical Bubble: Why UK research and innovation needs a greater diversity of priorities, politics, places and people*. Report. Nesta, London. Diversity and inclusion (of people, approaches, skills, and ideas) is also at the heart of the UK Research and Innovation's (UKRI) mission and funding priorities: <https://www.ukri.org/wp-content/uploads/2020/10/UKRI-091020-CorporatePlan2020-21.pdf>. Similar concerns have been raised about an overemphasis on the use journal impact factors for research funding and hiring purposes, which tend to favour global publishers over others: see <https://www.nature.com/articles/nature.2016.20224> and <https://www.tandfonline.com/doi/full/10.1080/08989621.2021.1909481>.

² This concept is referenced briefly in *Prospective analysis of a national open access strategy for Australia*, Report prepared by CSIRO Futures for use by the Office of Chief Scientist, November 2021, p. 49.

Research for Australia (ERA) submissions – is not jeopardized. Further analysis will be required to fully assess this risk, but some preliminary observations are made below.

2. Approach

The academic publishing market is highly concentrated. The top four publishers globally are responsible for 54% of Australian publications.¹ The top 15 publishers are responsible for ~75% of all Australian publications between 2011-20. The focus of this report is on the remaining ~25% of Australian publications, which are spread over a long tail of ~4000 publishers. Interestingly, there are more publishers today than ever before (10x the number now than in 2000²), but the average number of journals published per publisher has declined, resulting in a concentration at the top with a long tail below.

To assess the long tail and consider any implications of the proposed model, we divided the pool of publishers into six segments and sampled 23 publishers across them. More detailed consultations with publishers will be required to validate the observations made in this report. As noted above, we have also assessed the potential impact of the model on HASS research, as well as other more Australian-specific disciplines.

It is important to note that many highly respected Australian HASS journals are published by leading global publishers – for example, *Australian Historical Studies* and the *Australian Journal of Political Science* (both through Taylor and Francis). And Australian authors publish regularly in major HASS journals produced not only by Oxford and Cambridge University Press, but also the University of Chicago Press, Edinburgh University Press, and others. Similarly, in relation to research in Australian ecology, for example, including research on Australian mammals, bushfires, or soil science, many Australian researchers are publishing in leading international journals. And they are also publishing in CSIRO journals – for example, in *Wildlife Research*; the *Australian Journal of Zoology*; *Australian Mammalogy*; and *Pacific Conservation Biology*. These publishers will be able to adapt to the proposed OCS model. And many already have extensive OA arrangements and read and publish agreements with universities in place. However, it is important to consider the consequences for good journals in the long tail who might lack the resources and infrastructure to adapt, and thus who might be vulnerable to significant structural change in the publishing ecosystem.

Although the long tail is highly diverse, there are, in general, at least four kinds of publishers represented (with further variations within each):

- (i) small to medium sized commercial publishers
- (ii) university presses (including those associated with faculties or schools)

¹ 'Figure 4: Distribution of journal articles amongst publishers of research with Australian authors (2011-2020)', provided by OCS.

² Publishers and Market Consolidation Part 1' *Delta Think Open Access News and Views Newsletter*, ' , accessed June 22, 2022.

- (iii) learned societies and associations (including Royal Societies, learned societies, professional associations, disciplinary associations)
- (iv) government research organizations

I have tried to sample at least one of each type of publisher in each segment, wherever possible.

It's also important to try and get a sense of the quality of publications being published in the long tail. Aside from relying on the peer-review processes of the journals, as well as citation data (problematic in the case of HASS publications, which aren't well represented in WOS and SCOPUS data sets), we can also examine the extent to which these publications appear on the approved ARC journal list for ERA submissions, as well as among the top 30% of publications indicated in university submissions. These are only broad indicators, however, and further analysis may be required. I have tried to provide some indication of this below, for some of the sampled journals.

I drew on the analysis provided by the OCS conducted by CSIRO on the 'Distribution of Journal Articles amongst publishers of research with Australian authors 2011-2020'. The data was drawn from the WOS. A more comprehensive analysis would require further data cleansing, which is not in scope for this project.

Figure 1: Segments of the 25% tail of Australian author publications 2011-2020

Segments	Number of Publications	% of total
1	8000-1000	11.522
2	1000-500	2.577
3	500-100	5.786
4	100-50	1.533
5	50-25	1.093
6	25-0	2.025

3. Sampling the Segments

I divided up the segments roughly by number of publications to get a sense of the range of publishers in each section. The further down the tail you go, the larger the number of publishers. As a result, I have gradually narrowed the range of publications for investigation to try and get a more fine-grained sense of the kinds of publishers and publications we find as we move towards the end of the tail.

Segment 1

Segment 1 is that group of publishers in the next group below the dominant top 15, which are responsible for 75% of all journal publications by Australian authors. This segment accounts for the largest number of publications in the tail during the sample period.

Royal Australian College of General Practitioners (professional association)

RACGP publishes *the Australian Journal of General Practice*, which is available on a subscription basis (and membership of the College) and makes articles freely available online. It is not an ERA approved journal.

Edward Elgar (commercial)

A major commercial publisher that publishes a wide array of peer-reviewed journals, especially in the social sciences and law, but also in the natural sciences. All are published online, in a variety of formats and all offer 'gold' OA after accepted (with APC charges). Most are ERA approved journals and appear extensively in the 2018 ERA submission.

Royal Society of London (learned society, association)

Leading learned society that publishes a wide array of journals, with two as fully OA and four as 'transformative' journals moving to full OA when 75% of articles are OA. They offer read and publish agreements for institutions and 'OA membership' schemes for authors to reduce APC charges. Most are ERA approved journals and appear in the 2018 ERA submission.

Australian National University Press (university press)

ANU Press publishes a wide array of peer reviewed journals across mainly HASS and Australian and Asia Pacific subject domains – for example, *Aboriginal History*, *Lilith: A Feminist History Journal*, and *Agenda- A Journal of Policy Analysis and Reform*. It makes them freely available online for download or reading and only charges for print on demand copies under CC BY license. Most are ERA approved journals and appear in the 2018 ERA submission. Some receive additional funding from faculties or schools, in addition to hard copy sales.

Comments

Given most of these publishers have extensive digital and online infrastructure, as well as existing OA arrangements, it is unlikely they would be adversely affected by the proposed model. Some have funding from faculties and schools, or through membership fees in professional associations, and the impact of the model on these publishers will need to be considered.

Segment 2

Segment 2 includes publishers responsible for publishing between 1000 -500 articles during the sample period.

Australasian Med Publication Co Ltd (professional association)

It publishes the well-regarded *Medical Journal of Australia*. All research articles are freely available online, other articles through institutional subscription. Members of the Australian Medical Association also get access to the journal through their membership fees. The MJA is an ERA approved journal and cited extensively in the 2018 ERA submission. Further consultation would need to occur as to the proportion of revenue the journal gets from its hard copy subscriptions and the impact on their business model, or any changes to their membership fees that might be required if it moved to full OA.

University of Chicago Press (university press)

A major American publisher of a wide array of high-quality journals, especially in HASS (e.g. *Critical Inquiry*, *British Journal of the Philosophy of Science*, *Journal of Politics*). It supports green open access (with an embargo period) across all its journals, and gold open access across a select number. All are ERA approved journals and appear extensively in the 2018 ERA submission.

Company Biologists Ltd (not for profit commercial)

Company Biologists is a not-for-profit publishing organization created to support publications in biology. It has five major journals, all of which are offered under a costneutral, read and publish agreements with libraries and library consortia, with uncapped and fee-free publishing of OA research (including currently with CAUL). Not all are ERA approved journals.

Comments

Again, the sample suggests that most publishers in this segment are either already offering OA opportunities for authors and have online and other infrastructure that would allow for them to adapt to the proposed OA model. The question remains for professional associations as to their ability to adapt to a full OA model where they currently rely on subscription fees and/or hard copy sales to support the production of the journal.

Segment 3

Segment 3 includes publishers responsible for publishing from 500-100 Australian authored articles during the sample period.

Sydney Law School (university publication)

It publishes the *Sydney Law Review*. Authors retain copyright and grant and exclusive license back to the *Review*. It charges subscriptions for hardback copies and generates other revenue from the Australian Copyright Agency for educational copying, some royalty payments from online publishers, in addition to funding from the faculty. This mix of funding is not uncommon for many smaller university and faculty-based publishers. The SLR is an ERA approved journal and is cited extensively in the 2018 ERA submission.

Australian Society of Anaesthetists (professional association)

It publishes *Anaesthesia and Intensive care*, which is a peer reviewed journal through Sage. Funding comes from subscriptions and membership to the ASA. Sage offers a full range of gold and green OA options for authors. It is an ERA approved journal and appears extensively in 2018 ERA submissions for health and medical sciences.

Australian Archaeological Association (disciplinary association)

It publishes *Australian Archaeology*, a peer reviewed journal through Taylor and Francis. Membership of the AAA also gives you a subscription to the journal, which can also be purchased through Taylor and Francis. It offers authors gold open access options for publication. It is an ERA approved journal and is cited in the 2018 ERA submission.

Aboriginal Studies Press (government research organization)

In addition to publishing monographs (with a special focus on publishing work by Aboriginal and Torres Strait Islander researchers), AIATSIS publishes a peer reviewed journal, *Australian Aboriginal Studies*, with a focus on research in the humanities and social sciences and is supported through subscription fees for digital and hardcopy formats and support from AIATSIS. Issues are also available online through various online databases. It will be important to assess whether this business model would be sustainable under a national OA framework. It's not clear how important hard copy revenue is for the sustainability of the journal. It is an ERA approved journal and is cited in the 2018 ERA submission.

Comments

The main issue for many publishers in this segment – especially for professional associations and university and/or faculty publishers – is how moving fully to OA would impact their business model if currently dependent on subscriptions fees (for digital and hard copy),

university or philanthropic funding, or revenue from the Copyright Agency for educational copying. It will be particularly important to ensure that Aboriginal and Torres Strait Islander research is not disadvantaged under the proposed model and so further targeted consultation in this area is particularly required.

Segment 4

This segment includes publishers who have published 100-50 articles in the sample period.

Royal Historical Society of Victoria (disciplinary association)

It publishes the peer reviewed *Victorian Historical Journal*, which is the official journal of record for the Historical Society of Victoria. Published twice yearly in hard copy and digital formats available for purchase (digital copy of the journal available for free after 2 years). Membership of the Society also entails a subscription to the Journal via a tiered pricing scheme. It is an ERA approved journal and cited in the 2018 ERA submission.

Commonwealth Forestry Association (disciplinary/professional association)

It publishes the *International Forestry Review*, an international, peer-reviewed journal on forestry policy and science through Bio-One, a not-for-profit scientific publisher. It offers digital and hard copy format subscription rates, tiered for developing and developed countries of origin. Membership to the Association also includes access to digital and hard copy versions of the *Review*. It is an ERA approved journal and is cited in the 2018 ERA submission.

Australasian Nz Assoc Medieval Early Modern Studies (disciplinary association)

It publishes *Parergon*, a multidisciplinary, peer-reviewed journal of medieval and early modern studies. It offers subscriptions through membership in the Association, as well as for libraries and research institutions. Authors retain copyright and are also able to make pre- and post-print MS versions of their articles, as well as publisher versions available in institutional repositories and on personal websites without embargo periods. It is an ERA approved journal and cited in the 2018 ERA submission.

Renal Society of Australasia (professional association)

It publishes the *Renal Society of Australasia Journal*, a peer-reviewed, fully online journal. Access to the journal comes with purchasing membership in the Society. It retains copyright of accepted publications. It is an ERA approved journal and is cited in the 2018 ERA submission.

Comments

There are a larger number of associations, societies, and small publishers in the segment. A key issue for many will be the loss of subscription fee income in moving to a fully OA environment, although in many cases it is bundled into their membership fees (which might still be able to be charged). Some also have income streams from institutional subscriptions that might be covered by a national OA agreement. Note also that the audiences for many of these journals is broader than more specialized journals (e.g. *Royal Historical Society of Victoria*), and authors will often seek to place articles in these journals as a way to reach a more diverse readership. Also, many association journals are more multidisciplinary and pluralist in approach than mainstream discipline-specific journals, which, again, many authors find attractive.

Segment 5

This segment covers publishers who have published 50-25 publications over the sample period.

Australian Psychological Soc (professional association)

It publishes five peer reviewed journals through Taylor and Francis, including the *Australian Journal of Psychology*, and subscriptions are included in APS membership fees, in addition to be available through institutional subscriptions. Some of the journals are moving to full OA in 2022. All are approved ERA journals and appear extensively in the 2018 ERA submission.

Aust Inst of Family Studies (government research organization)

The Institute is a commonwealth funded research body focused on family well-being. It publishes a regular series of reports online and free of charge. Research findings are also published in peer reviewed international journals which are listed on their website. It doesn't publish its own journal, but rather commissioned reports, research reports, research summaries and government submissions.

Australasian Association of Theatre Drama & Performance (disciplinary association)

It publishes the *Australasian Drama Studies*, an entirely online, peer-reviewed, multidisciplinary publication. Subscriptions are included in membership of the Association, as well as available separately. Copyright remains with the author but they assign a nonexclusive license to ADS to publish the material. It is an ERA approved journal and is cited in the 2018 ERA submission.

Comments

As in Segment 4, there are many professional associations, societies, and smaller publishers in this segment. Some publish journals through established publishers, but many publish directly and thus are reliant on a range of income sources for support. Further consultation may be required to determine the impact of moving to full OA for their business model. There are also some large and mid-size North American publishers in this segment (and the next) who publish a range of journals, but are also major publishers of monographs, especially in HASS (e.g. Harvard University Press, University of British Columbia Press, University of Minnesota Press). Their journals are likely to be captured by read and publish agreements negotiated as part of national OA arrangement.

Segment 6

This segment covers publishers who have published 25-0 publications during the sample period (where 0 = 1 publication or less).

Royal Society of South Australia (society)

It publishes the *Transactions of the Royal Society of South Australia*, a multidisciplinary, peer-reviewed journal, with a focus on natural history (e.g. botany, zoology, biophysics, soil science), through Taylor and Francis. Gold open access is available to authors for this journal. It is an ERA approved journal and is cited in the 2018 ERA submission.

Assoc of Australian Palaeontologists (disciplinary association)

It publishes *Alcheringa*, a quarterly, peer-reviewed journal, is the official journal of the AAP, and published through Taylor and Francis. Subscriptions are through membership of the Geological Society of Australia (of which AAP is part), and separately for individuals and institutions. It is an ERA approved journal and is cited in the 2018 ERA submission.

Medical Soc Papua New Guinea (professional society)

The *PNG Medical Journal* is published by the PNG Medical Research Institute and the Medical Society. Subscription is included in the membership fees of the Society. Nonmember subscriptions are also available. It is an ERA approved journal and is cited in the 2018 ERA submission. (Last issue 2019)

Australian Mathematics Publ Assoc Inc (disciplinary association)

It publishes three peer-reviewed journals through Cambridge University Press with a range of subscription and OA arrangements. It also publishes a fully refereed, rapid publication *ANZIAM Journal Electronic Supplement*, with additional articles, which is available for free. All their journals are ERA approved and appear in the 2018 ERA submission.

University of New England (university publisher)

The School of Humanities publishes the *Journal of Australian Colonial History* annually, which is peer reviewed and specializes in a broad array of humanities research in colonial history. It is available electronically through individual and institutional subscription. It is an ERA approved journal and is cited in the 2018 ERA submission.

Comments

As with the previous, many journals in this segment are published through established publishers and thus should be able to adapt to a new OA framework. In other cases – for example, the *Australian Journal of Colonial History* – it's not clear if moving to full OA would impact their business model, given their likely dependence on direct individual and institutional subscription fees, as well as subsidies from the university.

4. General Observations

1. The long tail includes a wide range of publishers who are publishing an important and diverse array of high-quality research articles. Many of the journals they publish support multidisciplinary research that would otherwise not be easily published through more disciplinary-specific and global publishers. Many of the journals also target broader and more diverse audiences than those of mainstream publishers. Some of the journals are supported by well-established commercial publishers and university presses. Others are supported by a range of associations, societies, and research organizations, with a mix of revenue sources. The proposed OA model will need to ensure it has a governance structure and funding mechanism that preserves the current diversity of publication outlets in the long tail, as far as possible. The OCS should adopt the principle of maintaining Australia's 'bibliodiversity' as an explicit objective of proposed Australian model for OA. This is also important for ensuring the commitment to author autonomy is genuine. Note that I did not sample extensively from publishers in the '0' segment, which includes ~2000 publishers who published 1 article during the sample period. Many are foreign language and university-based publications, and further investigation may be required.
2. Many the sampled journals were included in the 2018 ERA submission, and in some cases, extensively so. Further analysis may be required (e.g citation analysis, top 30% submissions etc), but overall, this suggests that high quality research is being published in the long tail. As mentioned above, in some cases, these publishers are also reaching broader and more diverse audiences in Australia than many of the larger publishers.

3. Targeted consultations with select publishers included in the long tail should be considered to better understand the consequences of the proposed OA model for their financial viability. Many professional and disciplinary associations and societies include journal subscriptions as part of their membership fees (often tiered between digital and hard copy access). University based publishers often receive subsidies from their faculty or university. These publishers are also often in receipt of Copyright Agency funding from educational copying proceeds. The proposed OA model will need to consider the impact of a national funding agreement on these publishers. For example, greater OA will mean less need for educational copying fees, however this will need to be negotiated with the Copyright Agency given the current legal and contractual arrangements in place with universities. It's also not clear what the impact of greater OA for journal articles will be on learned societies and professional association publications, where subscriptions often help fund editorial support and production (both individual and institutional) or are bundled up with membership fees to individuals and included as part of their service provision. Further analysis and discussion with these publishers may be required. Digital production has reduced the costs of producing a journal dramatically, but it's still not costless. All the publishers and journals sampled above offered some kind of digital access to their publications, which suggests they have at least the minimal infrastructure required for expanding read access to all Australian users.
4. Specific attention should be given to Aboriginal and Torres Strait Islander research, especially in the humanities and social sciences. There are several important publishers of Aboriginal research examined above – including AIATSIS and ANU Press – however, there are other university and society publishers who publish work in this area. Consultations with AIATSIS would be a good place to start. This is work that may not be easily supported by the major publishers (although some clearly is published in these outlets), and it also often has a broader and more diverse set of audiences that researchers are targeting than more discipline-specific journals. The proposed OA model should not only support greater access to Aboriginal and Torres Strait Islander research but also enhance it. Note that Australian researchers have obligations for research conducted in relation to Aboriginal and Torres Strait Islander peoples that need to be accommodated in the model – in particular, respecting the principle of self-determination.³
5. Given the role that the diversity of publishers in the long tail play in supporting a wide range of Australian research, and especially in HASS, the OCS should consider making explicit reference to the broader benefits of OA in this regard. Currently, the stated objectives for a nationally coordinated approach to OA refer mainly to the economic and commercial benefits of increasing access, as well as in maintaining

³ See for example the *Australian Code for the Responsible Conduct of Research* (2018); *NHMRC Ethical conduct in research with Aboriginal and Torres Strait Islander Peoples and communities: Guidelines for researchers and stakeholders* (2018) and *AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research* (2020)

Australia's global position in 'science, research and innovation'.⁴ However, there are clearly potential social and cultural benefits to be gained by improving accessibility to Australian research that should be included in the business case. This will, in turn, send a positive signal about the value of research in HASS and the creative arts more generally, as well as the importance of basic research across all disciplines.

6. University libraries use third party providers to consolidate and manage their subscriptions with smaller publishers (for example, at the University of Sydney we use EBSCO <https://www.ebsco.com/products/journal-subscription-services>.) Funding for these arrangements is subject to annual discretionary budgets. Depending on how the national OA funding arrangements were structured, there is a risk that some university libraries will have less flexibility to allocate funding for these smaller publisher subscriptions if existing funding is fully centralized. Further consultation with university librarians and CAUL should be considered on this aspect of the proposed model.

⁴ *Open Access Prospective Analysis*, 'Objectives and Principles', p. 26. There is reference to ensuring peer reviewed articles in 'all disciplines' are openly accessible in the subsequent bullet points.