Input of the German Research Foundation (DFG) regarding the consultation of the European Commission on the „Future of Scholarly Publishing and Scholarly Communication“ (March 2019)

1 Ideal vision proposed in the report and our role as funding organization

We concur with many aspects offered by the report “Future of Scholarly Publishing and Scholarly Communication” regarding the analysis of present flaws in the scholarly publishing system. From our point of view, major shortcomings consist in the following aspects:

- Restricted or insufficient access to many relevant resources for researchers and society, especially insufficient regarding the possibility to make best use of digital resources in scientific and scholarly practice
- Lack of economic sustainability regarding rising prices for access especially to large journal subscription packages (Big Deals)
- Incoherence between discovery and access, unequal treatment of different publication and contribution types regarding findability and frictions regarding re-usability
- Long term archiving of digital output
- Inadequate and unequal treatment of a variety of contribution types in research evaluation schemes

Regarding the vision put forward in the report on the “Future of Scholarly Publishing and Scholarly Communication”, we offer the following commentary:

- We agree that for the sake of scholarly discourse and general communication, research publications need to be made accessible as early as possible. However, we surmise that Openness will not be achieved at any cost and is not relevant in all disciplines to the same degree. Open access needs to be considered as an instrument for better research, not an ideological aim in itself. Open access as a dominant model for scholarly publications will from our perspective be at the center of future scholarly publishing. Our position regarding the Open Access Transformation is elucidated in this document: http://www.dfg.de/en/service/press/press_releases/2018/press_release_no_10/index.html

- Barriers between discovery and access of content need to be minimized and should no longer prevail; we also support the vision that scientific and scholarly information, which is made openly available, needs to be interpretable, understandable and usable by humans and by machine-oriented techniques. All types of relevant scientific and scholarly contributions should be registered, certified, disseminated, preserved and be considered for evaluating in adequate and purposeful manners. All scholars and scientists have equal chances to participate in the production and use of knowledge.

- We support open infrastructures, but they require maintenance also in the long term, which is a task usually beyond a funding agencies’ remit. We also agree that interconnected infrastructure needs to meet researchers’ needs. Researchers should actively contribute to shaping tools and services. A dialogue between technical and research communities helps to shape best solutions.

- We agree with the idea that public institutions oversee mechanisms for active stewardship and preservation of scholarly contents. Essential elements should be in public hands, but services should be offered by various actors. No single organization should have undue dominance.

- Global research networks will aim to balance speed with attention to integrity and reliability.
Certification and quality assurance of content to be made public rests on entirely transparent procedures. Peer review is not the only mechanism for quality assurance, and can occur post registration.

- Evaluation of research will in general be undertaken in the recognition of the full range of contributions, as currently sensitive to disciplines, and balancing qualitative and quantitative aspects.

- The costs, and the price settings and revenues regarding scientific and scholarly publications will have to become transparent, as well as financial flows between all parties in the system. The relationship should be clear between costs and kinds and levels of service, and costs can potentially be reduced.

- Funding schemes are designed to support experimentation and an enhanced range of services to meet changing needs.

Functions and actors

We observe that funders have taken on a stronger role in the future regarding the shaping, standardization and research-adequate evolution of the scholarly publishing and communication system. We think that the landscape can only be changed if research takes the lead and initiates change, institutions and learned societies need to increase their responsibilities in this regard as well. Funders alone will not be able to initiate change if it is not supported by research communities.

DFG has a specific role being a self-governing organization of research and a funder.

In this role, we fund research and research-supporting infrastructure. If not the role in the future system, at least some aspects in funding and strategic regards will help to support change regarding our vision of the future system.

- We acknowledge that new business models in scholarly publication require adequate and new funding structures for scholarly publication.
- Clear and simple requirements for the use of funds are important. In an ideal setting, regulations of funders do not provoke complications or even conflicts for researchers.
- Funders are likely to strengthen their engagement as enabler of Open Access.
- Funders are not likely to take on the role as organizers of peer review for publications, but might built infrastructures for publication or act as publishers regarding materials from funded projects.
- Regarding changing roles of other actors, especially research institutions and libraries, we would like to offer a deeper analysis in this document: [https://www.dfg.de/download/pdf/foerderung/programme/lis/180522_awbi_impulspapier.pdf](https://www.dfg.de/download/pdf/foerderung/programme/lis/180522_awbi_impulspapier.pdf)

2 Measures to be undertaken by DFG / not to be undertaken

We support the following suggested measures for funders:

- Encouraging that contributions are openly available as early as possible, discoverable, reusable according to community standards
- Focusing on quality of the research peer review and evaluation procedures
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- Supporting the refusal of non disclosure clauses and asking for the inclusion of clauses that enable cost and price control, monitoring
- Aiming at funding mechanisms to support development of open, interconnected, distributed scholarly publication infrastructures
- Working with other actors towards ensuring that the total costs of publication and are transparent

What do other stakeholders have to do

In order to shape a research oriented scholarly publishing system, publishing houses should provide high quality service for adequate prices and develop sustainable business models for open access that are affordable to research communities.