

Mrs. Maria da Graça Carvalho  
Member of the Committee on Industry,  
Research and Energy (ITRE)  
of the European Parliament

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Dear Mrs. da Graça Carvalho,

On behalf of LERU, the League of European Research Universities, I would like to comment on the Council Decisions establishing the specific Programme Implementing "Horizon 2020 - the Framework Programme for Research and Innovation (2014-2020)".

LERU is committed to contributing strongly to the development of excellent European research infrastructures, which are firmly rooted in an Open Access environment. LERU Universities are participating in many European projects in the areas of Open Access repositories, interoperability, digitization of and access to our cultural heritage and preservation. LERU Universities have produced a [Roadmap Towards Open Access](#), which all the LERU members have endorsed.

Research Universities have a long history of supporting high-level research. Research support over the coming decades means supporting Open Access, open data, research data infrastructures and research data management, and training students and young researchers in the use and management of data.

Various organizations have commented on the before-mentioned European Programme. Their comments and proposals are now publicly available.

LERU feels a special responsibility to address the proposals of the International Association of Scientific, Technical and Medical Publishers (STM) expressed in their letter to you. These proposals do not represent the institutional interests of research Universities and Open Access publishers.

1. LERU does not support the STM request to include "sustainable" with the term Open Access. The term 'sustainable' is ambiguous and suggests in this particular context that "open access publishing" is solely linked to publications that have the support and commitment of the STM publishers. It could also be interpreted as a rather conservative approach just to preserve the current system.

This approach neglects innovations and developments stimulated by new successful Open Access publishers, such as Biomed Central, and Open Access publishing driven by research communities, such as

the Public Library of Science. These new publishers demonstrate that innovative business models can be successfully implemented and made sustainable.

2. The EC-funded PEER project on Green Open Access, co-ordinated by STM, with major research libraries as partners, has shown that there is no evidence that self-archiving affects journal viability.

3. The STM proposal to replace “research results” and “results of publicly-funded research” with “articles that describe, analyze and interpret research” is in contrast with the holistic approach of the Horizon 2020 Programme. The consequences of the STM proposal would be that Open Access rules would be limited to research articles, steering away from research data.

LERU strongly supports the policy statements and programmes of the European Commission in the area of scientific data. Data are an essential part of European research infrastructures and should be available for access, verification, re-use, linking to publications and integration with other data.

From an institutional perspective we increasingly observe efforts at Universities in Europe to define campus strategies for local research infrastructures that link to the European research infrastructures. We value the important role of the European Commission in stimulating this development.

On 30 November 2012, LERU is celebrating its 10th anniversary with a celebratory Conference in Brussels entitled Open Horizons - a Revolution in Open Science. This is a high-level strategic Conference to look at the potential that Open Access and Open Data present for the European Research Area. The invention of moveable type printing in the West by Gutenberg in the fifteenth century helped usher in Humanist scholarship. LERU believes that the development of Open approaches to research dissemination in the 21st century will have equally profound effects. LERU will be delighted to invite you and fellow members of ITRE, the energy and industry committee of the European Parliament, to attend our Conference to engage in the debate.

With best regards,



Prof. dr. Kurt Deketelaere  
Secretary-General  
League of European Research Universities