

Ligue des Bibliothèques Européennes de Recherche Association of European Research Libraries

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

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Dear Mrs. de Graça Carvalho,

On behalf of LIBER, the Association of European Research Libraries, with more than 400 members in 40 different countries, 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)".

LIBER is committed to contribute strongly to the development of excellent European research infrastructures, which are firmly rooted in an Open Access environment. LIBER libraries are participating in many European projects in the areas of Open Access repositories, interoperability, digitization of and access to our cultural heritage and preservation. LIBER is actively stimulating the engagement of libraries in research data infrastructures. Research libraries 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.

LIBER feels a special responsibility to address the proposals of the International Association of Scientific, Technical and Medical Publishers (STM) expressed in their letter to MEP Maria

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de Graca Carvalho. These proposals do not represent the institutional interests of research libraries, the universities they represent and Open Access publishers.

- LIBER 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 to just 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, coordinated by STM, with major libraries as partners, has shown that there is no evidence that self-archiving effects 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.

LIBER 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.

With best regards

Poul AVID

Dr. Paul Ayris President of LIBER