

5 May 2021

Professor Anne Kelso AO FAA FAHMS
Chief Executive Officer
National Health and Medical Research Council

delivered by email to: quality@nhmrc.gov.au

Dear Professor Kelso,

NHMRC DRAFT OPEN ACCESS POLICY AND FURTHER GUIDANCE CONSULTATION

I am writing in response to the NHMRC consultation paper on open access policy for peer-reviewed publications arising from NHMRC supported research.

The Australian Healthcare and Hospitals Association (AHHA) is Australia's national peak body for public and not-for-profit hospitals and healthcare providers, and is the owner of the *Australian Health Review* (AHR), an academic peer-reviewed journal that has been published continuously since 1978.

AHR makes contributions on all aspects of: health policy, management and governance; healthcare delivery systems; workforce; health financing; and other matters of interest to those working in health care. The journal publishes analyses and commentary, original research from practitioners – managers and clinicians – and reports on breakthrough projects that demonstrate better ways of delivering care.

AHHA in general supports the rapid and transparent dissemination of information and reports to the research and broader community. Each edition of the AHR has at least five open access articles which can be further increased by the payment of an open access fee by authors or by other sources.

While we note that the consultation draft paper states that the NHMRC does not require or preclude authors from accessing paid open access programs, AHHA is concerned that the potential impact on journal owners is not acknowledged in the draft Open Access Policy document.

AHHA is not-for-profit health promotion charity and the cost to run the AHR is a minimum of \$250,000 a year. The viability of journals supported by not-for-profit organisations should not be assumed and the NHMRC should take explicit consideration of the impact its policy directions can have on journal owners and funders. AHHA is concerned that this policy could inadvertently lead to journals avoiding manuscripts from NHMRC funded studies and/or journals becoming unviable and closing.

AHHA is also concerned that the cOAlition S's Rights Retention Strategy effectively removes authors' ability to control the rights in their paper. This could also compromise a publisher's ability to recover the peer review investment in a researcher's article. We believe this will undermine the viability of high-quality journals such as *Australian Health Review* and, most importantly, directly impact author freedoms over control of their work and choice of publication venue.

AHHA has always been supportive of the research community in pursuit of our members' professional interests and needs. However, the NHMRC needs to explicitly consider the impact of directives to researchers on the entire ecosystem of peer reviewed publishing.

Your sincerely

A handwritten signature in blue ink, reading "Alison Verhoeven".

Alison Verhoeven
Chief Executive