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<https://unesdoc.unesco.org/ark:/48223/pf0000374409.locale=en.page=10>

Kommentit Avoimen tieteen koordinaation lomakepohjaan kansallisen lausunnon tueksi
<https://avointiede.fi/fi/ajankohtaista/unescon-suositusluonnos-avoimesta-tieteesta>

Part I, para 1-6

Point 1 should include language in the "regardless" list. Without explicit recognition of linguistic diversity, it is difficult to imagine how "all outputs of research" can be accessed or can find its most relevant publication channel and audience (Point 2).

Point 4: Recognition of "regional differences" is most welcome. The Draft, however, could (and should) be strengthened to better recognize and allow for these differences and regional equality.

Point 6/ iii: Investment in Open Science infrastructures in a sustainable, non-discriminatory fashion is most important. Scholarly publishing, in general, and nationally oriented non-profit scholarly publishing, in particular, would deserve explicit attention as an Open Science infrastructure, especially in small language areas.

Part II, para 7-14

II Definition / Points 8 and 9/i: Does "freely available and accessible" mean free of charge?

One should note that scholarly publishers make a major contribution to the quality of research publications and their distribution and accessibility, but calls for free-of-charge OA is a financial threat to many minority-language publishers, especially in some social sciences and the humanities. A clearer definition of "freely" might therefore be in order to acknowledge these side effects of Open-Science-related ideals and this particular definition of OA. Surely the purpose cannot be bypassing an important scholarly infrastructure! An investment in this infrastructure to replace the costs of OA is a prerequisite. This concern applies to **Point 9/vi**, as well: Open Educational Resources.

The key question and concern is: Who will pay the costs of OA production for small society and other non-profit or marginal-profit publishers, especially in small language areas and small disciplines? Ideals need to be accompanied by responsible and possible realities.

Point 9/v: Open Peer Review contains many problems and is not always an improvement of other options. A one-size-fits-all solution should not be dictated from above to publishers and scholars. This approach contradicts the Draft's ideals of diversity.

Point 9/viii Diversity of Knowledge cannot be maintained, if costs of free-of-charge OA publishing are not compensated equally. What works well for a large English-language hard science publisher can kill a small minority-language humanities publisher. Openness to all Scholarly Knowledge will require attention to language in order to sustain the desired CORE VALUES & PRINCIPLES and "participation of all people and cultures."

Part III para 15-16

Point 16/e: This is important: "there is no one-size fits all way of practicing Open Science." The Draft should perhaps be more self-critical regarding this key statement.

Point 16/f: Sustainable funding models are the key. But the Draft seems to justify the end of small, modestly commercial scholarly publishers by stating that " Open Science infrastructures should be non-profit." The statement may be a deserved criticism against global science publishing corporations but can kill off significant segments of small-language publishers (especially in the humanities) who are commercial enterprises but work on marginal profits and are key developers of national languages and distributors of understandable science to the reading public and undergraduate students.

Point 19/e does not suffice to mend the problem created by statements made elsewhere in the Draft.

General comments

The Draft is somewhat self-contradicting.

The document claims that Open Science is an " enterprise that improves the quality of science." What is the evidence that backs up this claim? One could also convincingly argue the opposite.

"the collaborative and inclusive characteristics of Open Science allow new social actors to be actively involved in scientific production, democratizing knowledge, addressing existing systemic inequalities and enclosures of wealth, knowledge and power and guiding scientific work towards solving problems of social importance"

Yes. But in small language regions Open Science, when demanding immediate Open Access to peer-reviewed scholarly publications free of charge, is creating new systemic inequalities between scholarly languages and disciplines. A large hard-science publisher operating in English may employ article fees and thus meet the OA challenge, whereas, say, a small society publisher in the Finnish-language humanities may face bankruptcy, especially if the national science policy continues to favor "international" English-language publishing.

The thus-created, new inequality goes against the ideals of multi-linguistic, intellectually diverse academia that gives back to society and develops and actively engages small languages as

languages of science, education, and public evidence-based debate. This runs a risk of creating new "problems of social importance" and imbalancing access to new knowledge. Similar concerns run thru the present Draft.

Therefore, the document's expectation that Open Science will increase "the social impact of science by multiplying opportunities for local, national, regional and global participation in the research process, and opportunities for wider circulation of scientific findings" may, in some cases, result in the opposite locally and regionally. This possibility contradicts the Draft's ideals regarding "marginalized groups" and "capabilities of countries and regions."

If we may say so, the document seems to deliver an unwanted hint of neo-colonialist thinking in its ideals. By way of example: the OA publishing movement can be criticized for privileging Western global English-language science publishing as a leading source of wisdom and thereby for undermining local and regional infrastructure, knowledge production, education, decision making, and evidence-based public debate (and, thereby, democracy).

Thank you for the opportunity to contribute to the national input.