



Suomen tiedekustantajien liitto  
Förbundet för vetenskapspubliserung i Finland  
Finnish Association for Scholarly Publishing

for the European Commission  
on June 25, 2026

**REFERENCE: European Commission, Call for Evidence, by June 25, 2026**

*Report on the review of the Copyright in the Digital Single Market Directive /*

*Targeted initiative for a better copyright environment for European creativity and innovation*

**THE SUBMITTER**

The Finnish Association for Scholarly Publishing is a non-profit funding, training, and advocacy organisation founded in 1993 to distribute collective copyright licensing fees to Finnish scholarly publishers. The Association is funded by, and a member of, Kopiosto, Finland's national collective copyright management organization. The Association presently has 164 member organisations, all of which are small, non-profit journal and book publishers. Most of them publish in Finland's national languages Finnish and Swedish, and play a substantial role in training junior author-scholars and in supporting reliable information production in Finnish society. The independent quality-control services offered by these publishers to universities and other research institutions are indispensable.

<https://tiedekustantajat.fi/suomen-tiedekustantajien-liitto/>

<https://tiedekustantajat.fi/suomen-tiedekustantajien-liitto/jasenet/>

<https://kopiosto.fi/>

**THE SUBMISSION: KEY POINTS**

- ✓ Small and national language scholarly publishing environments need sensitive attention
- ✓ The emphasis should be on improving existing regulatory tools and their efficiency
- ✓ Those demanding secondary publishing rights should cover their costs
- ✓ Enforcing mandatory secondary publishing rights will erode existing funding mechanisms
- ✓ Uniform, mandatory approach to secondary publishing rights may be harmful
- ✓ Rightsholders should be compensated for the use of their work in training generative AI
- ✓ The developed regulation of AI should increase transparency
- ✓ Any exception regarding research should exclude commercial use in AI development
- ✓ Comprehensive, in-depth, and unbiased national evaluations and dialogue are needed

## THE SUBMISSION

The Finnish Association for Scholarly Publishing commends the goal of improving the copyright environment so that vitality, creativity, and innovation can flourish in Europe. Improved measures to counter piracy are most welcome, as well, and the same applies to the control of Artificial Intelligence. Rightsholders and their work should, indeed, be better protected from exploitation, e.g., in the training of generative language models.

The concerns are the following:

The proposal overlooks substantial differences in scholarly publishing environments across Europe and assume that one approach can serve everybody. The measures are designed to challenge global commercial science publishers but the reality in national and other small language areas is very different and needs sensitive attention. These areas form limited scholarly publishing markets where publishers are typically non-profit, discipline-specific, and depend on grants from collective licensing fees and public funding (which in Finland is mostly limited to scholarly journal publishing). Uniform, mandatory secondary publishing rights regulation across Europe would seriously damage scholarly publishing in these environments.

The view in the proposal that

”[a]cademics also experience difficulties in widely sharing, accessing and reusing the results of publicly funded research as they often need to transfer their rights to publishers to have their works published in scientific journals”

may apply to global commercial publishing houses but seems exaggerated from the perspective of Finnish and other national scholarly publishers. In Finland, copyright is typically shared and publishers and authors are generally loyal to another. Their roles overlap, as author-scholars serve small society publishers as editors (often pro bono) and scholarly publishers conduct and publish research. Only few Finnish scholarly journal publishers take all rights – but often allow immediate secondary publishing of the final article in an institutional repository.

Copyrighted materials have produced – and continue to produce – collective licensing fees to both authors and publishers in Finland. This income to both parties, however, is substantially diminishing because of the reluctance of universities to pay for licenses and their related push for Creative Commons licensing and Rights Retention Strategies. Public funding has not met the gap in resources and is decreasing. The Finland described in the proposal’s background materials appears to be overtly problem-free and biased, as the local rightsholders’ – both authors’ and publishers’ – views are omitted.

Instead of creating new compulsory copyright exceptions for research purposes, the emphasis should be on improving the efficiency and fairness of existing tools. Where secondary publication is mandated (or opting out is made as difficult for author-scholars as it is in Finnish universities today), those demanding this dissemination (such as universities, other research organizations, and research funders) should cover the subsequent costs and compensate for the publishers’ loss of

income. Open Access is not synonymous to free of charge, even if Finnish university libraries favor this interpretation.

It should be noted that in Finland a sustainable alternative to guarantee open access to information already exists under the national collective rights management system that benefits both authors and publishers (via Kopiosto, mandated by the Ministry of Education and Culture). Research results are, and can be made, widely accessible without leaving the costs to the publisher and the authors without licensing income.

The investment by small-language scholarly publishers in author training, (sub)disciplinary community building, quality control, and distribution of research results is substantial. Universities and other research institutions, individual scholars, and learned societies depend on these services. By the time a book or an article is published, it has been peer-reviewed, edited, fact-checked, corrected, illustrated, laid out, printed, digitalized, disseminated, catalogued, and marketed, at its publisher's risk. If the same material becomes simultaneously available for free (perhaps in poorer quality), publishing non-fiction and research books and journals will make little sense, especially because the market in national languages is limited and even if it is not for profit.

Article publishing fees are not sustainable in a small language environment where national science policy favors publishing in English in international journals and competition is therefore unbalanced. The future of sustainable development of scientific terminology, abstract thinking and learning, and critical knowledge production in society in a small language looks grim, if homogenization is forced and domination of English-language commercial publishing prevails. If secondary publishing rights are forced, it works to erode existing funding mechanisms without offering alternative revenue. A recent doctoral dissertation at the University of Tampere (Erika Lilja, April 2026) suggests that insensitive Open Access policies may lead to alienation and resistance among scholars: <https://urn.fi/URN:ISBN:978-952-03-4500-6>

Rightsholders – both authors and publishers – should receive compensation when their work is used for training generative AI. Information about when, where, and how their work is being used should be available much more readily. The existing regulatory framework should therefore be developed toward increased transparency. Where applicable, the status and role of collective management and licensing organizations (such as Kopiosto in Finland) should be supported to facilitate stronger collective control and remuneration. Any exception regarding scientific research should exclude commercial use in AI development.

Comprehensive, in-depth, and unbiased national evaluations of impact and open-minded dialogue are needed, if legislation is to be renewed.