The Council of Australian University Librarians (CAUL) and Open Access Australasia wish to express our joint concerns over the recent introduction of the Article Development Charge (ADC) model by the American Chemical Society (ACS). At the heart of CAUL's mission is the commitment to facilitate connection and collaboration, and optimise collective knowledge, expertise, and resources, to achieve strategic outcomes at scale in priority areas for the university library sector. As an advocacy organisation for Open Access, Open Access Australasia is committed to working towards diverse approaches to open access that support equity – both to read and publish research. We believe that the equitable pursuit of knowledge and its dissemination should be at the core of any scholarly publication model.

While we recognise that publishers need to evolve in the changing landscape of scholarly communication, the current ADC approach taken by ACS raises serious concerns:

- **Undermining Open Access Transition**: The ADC model, as presented, appears to divert from the broader scholarly community's ambition of transitioning towards a sustainable and equitable open access publishing system. Charging authors to make their unpublished manuscripts immediately accessible in repositories, while still placing the Version of Record behind paywalls, is contrary to the aims and principles of Open Access and the important role of repositories.

- **"Double Dipping" Concerns**: By charging an ADC for manuscripts which will eventually reside behind paywalls, ACS is charging the community twice for the same process. Under this model, ACS are paid twice – once by authors (through the ADC) and again by subscribers (through subscription fees). This dual-revenue approach can only be interpreted as "double dipping" and does not reflect a transparent, equitable or sustainable financial model for scholarly communication.

- **Inhibiting Equitable Access**: The ADC model may further widen the divide between authors at well-resourced institutions and authors who are not associated with these institutions, potentially inhibiting many authors from sharing their research immediately. While waivers and discounts are mentioned, the broader implications of such financial barriers need to be fully addressed.

- **Questioning Value Proposition**: The distinction between the costs covered by the ADC and the traditional APC is not clear-cut, and the value proposition of the ADC to the scholarly community remains ambiguous. ACS state that the ‘ADC covers the cost of ACS’ pre-acceptance publishing services, from initial submission through to the final editorial decision’. Given that most editorial and peer-review work is undertaken by academics for free, and that the broader costs of publication are covered by existing subscription costs, CAUL and Open Access Australasia believes that the justification for this additional charge is unfounded.
This ADC charge conflicts with Rights Retention policies of funders and institutions that require researchers or institutions to not transfer copyright to publishers, and to retain other rights enabling articles to be deposited in repositories.

Chair of the CAUL Content Procurement Service, Hero Macdonald, states:

“We value the importance of mission-based publishers in their role within the scholarly communications ecosystem. However, the introduction of Article Development Charges on hybrid journals is a concerning proposal that can only be interpreted as double-dipping by ACS. Libraries already pay subscriptions for hybrid journals, which more than cover the cost of production. This is a concerning new model that is clearly designed to further monetise our community’s commitment to equitable and sustainable open access and undermines what should be an essential right of authors to deposit their unpublished manuscripts in institutional repositories for free without embargo. The introduction of new charges like ADCs, and particularly those without clear justification or transparency around pricing, simply seek to redirect public funds away from researchers and research institutions that should be used to support research itself. The continued attempts by commercial publishers to monetise the Open Access movement at the expense of research needs to be challenged.”

Kim Tairi, Chair of the Open Access Australasia Executive Committee said: “In attempting to impose a charge on the deposit of author accepted manuscripts to an institutional repository, it is very disappointing that ACS have acted unilaterally without consultation with affected parties. Their action shows a lack of understanding of the role of repositories not only in providing access to content created by their researchers, but also in holding and preserving the institutional record of universities. It fails to understand the potential effect on less resourced authors, institutions and countries, potentially furthering already existing inequities. Such an approach contradicts the UNESCO Recommendation on Open Science which upholds both diversity and inclusivity in knowledge creation and dissemination, a goal that cannot be attained if less affluent researchers and institutions are excluded from sharing the results of their research by imposing this additional fee. To accept this practice from ACS would set a dangerous precedent for other publishers to follow.”

CAUL and Open Access Australasia firmly believe in fostering an environment where scholarly research is not only accessible but can be shared widely without unnecessary financial burdens on the researchers or institutions: where there is equity to both publish and read.

CAUL Members and others across the Australian scholarly community have expressed many concerns in recent days, which are reflected in this statement. We urge ACS to reconsider this model, taking into account the broader implications for the academic community, especially those concerning open access, transparency, and equity, and to support broader efforts to ensure authors retain rights – at no cost – over their accepted manuscripts.

We remain committed to working with publishers, including ACS, to ensure that scholarly publishing models truly serve the needs of researchers, universities, and the wider community.

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