

Access and reuse of research articles in the EU

Commenting on the EU economic analysis on access and reuse of publicly funded research



01

The analysis of SPR and the research exception relies on **limited and inconclusive data.**



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The analysis risks **mischaracterising the role, costs and dynamics** of scholarly publishing.



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Policy interventions of this scale require **robust impact evidence.**

These methodological and evidentiary concerns should be carefully considered before the findings inform policy decisions.

Background

On 30 April 2026, the European Commission published the analysis it commissioned on access to and reuse of publicly funded research, “Economic analysis of options for improving EU legislative and regulatory frameworks with impact on access and reuse of publicly funded R&I results and of publications and data for scientific purposes.” STM, together with ALPSP, EMMA, ENPA, EPC, FEP and SocPC, submitted comments on the report.

Together, we represent a broad cross-section of the publishing sector, including commercial, society, and independent houses across academic, news and book publishing. Our interest is grounded in a strong commitment to advancing trusted knowledge. While the report contains some findings consistent with sector experience, it raises significant methodological and evidentiary concerns that should be carefully considered before informing policy decisions.

The report raises important policy questions, but draws conclusions that extend beyond the available evidence base.

Key takeaways from the economic analysis report

Limitations in evidence base and methodology

- The analysis relies heavily on perception-based data rather than demonstrated evidence of impact.
- Survey and interview evidence do not demonstrate macro-level outcomes such as changes in Open Access share, research efficiency, or innovation performance.
- Key methodological gaps limit the robustness of the findings, including incomplete scenario design and limited representation from non-profit and society publishers.

Mischaracterisation of the role, costs and dynamics of publishing

- Publishing costs represent a small fraction of overall research investment — and that investment is what unlocks the value of the rest.
- It mischaracterises how publishing models operate in practice — particularly transformative agreements in enabling the transition to OA, and SPR in its reliance on the subscription model.
- It understates the costs incurred in the infrastructure and management of peer review.
- The analysis underestimates ecosystem diversity and the disproportionate effects on society and smaller publishers

Limited evidence of real-world impact from the Secondary Publication Right (SPR)

- Existing national SPRs have shown limited or no measurable impact on overall OA shares.
- Open access in Europe is already high (60–70%), primarily driven by transformative agreements — not SPR — limiting the scale of additional gains from further intervention.
- Stronger SPR models risk disrupting the mechanisms already delivering the transition and undermining the diversity and sustainability of the European publishing industry.

A sufficiently robust evidentiary basis is not established for legislative change on the research exception

- The evidence is limited, context-dependent, and ultimately inconclusive.
- Without clarity on implementation, estimated impacts remain inherently speculative.

Caution is advised

- The report should be considered alongside previous evidence and the legal boundaries that any new intervention — for both SPR and the research exception — needs to respect.

Looking ahead

Achieving Europe's shared objectives on access, reuse, and research performance will require more than top-down policy intervention alone.

We therefore invite the European Commission to work closely with publishers, authors and other stakeholders to develop practical, sustainable solutions that support innovation and openness while respecting the fundamental freedoms, rights and legitimate interests of publishers, learned societies and researchers on which high-quality scholarly communication depends.

We encourage and stand ready to support any future research or policy reflection in this area, to help ensure that subsequent studies are methodologically robust, evidence-based, and fully representative of the diversity and realities of the European publishing sector.

ABOUT THE SIGNATORIES

As ALPSP, EMMA, ENPA, EPC, FEP, SocPC and STM, we represent a broad cross-section of the publishing sector — commercial, society, and independent houses across academic, news and book publishing. We support the dissemination, validation and long-term stewardship of the knowledge ecosystem.



Read the full response