

## The European Diamond Capacity Hub's (EDCH) Response to the NIH Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs

The European Diamond Capacity Hub (EDCH) would like to respond to the NIH Request for Information on Maximizing Research Funds by Limiting Allowable Publishing Costs. As they stand now, the NIH proposals lack nuance in that they treat all publishing services in the same undifferentiated way. In addition, these proposals represent a missed opportunity to use public funds to nudge the scholarly publishing system towards fairer and financially transparent publishing solutions, the adoption of more Open Science principles, and not-for-profit, scholar-led academic publishing.

The EDCH agrees with NIH that it is important to limit publishing costs that currently channel 28-40%<sup>1</sup> profits to the shareholders of large corporate publishers. The EDCH believes it is imperative that the funding to support such costs be redirected to bring scholarly publishing back under the control of the academic community. We would recommend that NIH mandate that its funded authors deposit their preprints and Author Accepted Manuscripts (AAM) into PubMed Central at no cost to NIH or themselves. This measure would enable NIH to invest funds previously directed to APCs in shared infrastructure, repositories, and community-driven publishing models such as Diamond Open Access (OA). Diamond OA is a not-for-profit publishing model in which content-related elements are entirely controlled by the academic communities, no costs are charged to either readers or authors, and service-related elements (copy-editing typesetting etc) can be outsourced competitively to publishing service providers. The EDCH also believes that any measures to limit the cost of publishing should be formulated in such a way as to ensure access to reading and publishing for all researchers worldwide, to encourage and reward Open Science practices including open/transparent peer review, and to increase the trustworthiness, transparency, and openness of the scholarly process.

**Option 1: Disallow all publication costs.** NIH could no longer support publication costs through any funding mechanism. Some private funders have disallowed costs for peer-reviewed publications as they seek to place increased value on preprints.

The EDCH does not believe that NIH should stop supporting publication costs for peer-reviewed publications as this will undermine peer review, the cornerstone of science itself. A scholarly communication system that merely consists of unreviewed preprints would be a disaster for knowledge curation. The most valuable part of publishing is the conversation between authors, reviewers and editors, which is part and parcel of research and should be funded. The publication of peer-reviewed articles should thus be financially supported, and this should not be reduced to a binary choice between paying for APCs or not. NIH support for publication costs should be directed towards fair and community-owned publishing solutions. For example, NIH may want to phase out or stop paying for APCs to publishers who do not provide fair publishing solutions to authors who cannot afford APCs. One such fair solution is Subscribe to Open (S2O) for example: NIH could consider allowing authors to make fixed contributions to their institutional libraries who support S2O publishers and journals. In addition, NIH should allow researchers to use their funds to pay for contributions to Diamond OA journals, for instance the Voluntary Author Contributions (VACs) that Diamond Open Access journals often accept. These contributions should not be capped, as they are typically a fraction of APCs, and contribute to a not-for-profit, scholar-owned publication system. This will accelerate the necessary and welcome transition from

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<sup>1</sup> Springer Nature reported an adjusted operating profit margin of 28% in 2024 (<https://www.researchprofessionalnews.com/rr-news-world-2024-11-springer-nature-reports-adjusted-operating-profit-margin-of-28/>) and Elsevier has a “roughly 40% profit margin” (<https://www.promarket.org/2024/04/24/high-prices-and-market-power-of-academic-publishing-reduce-article-citations/>)

corporate publishing to community-controlled not-for-profit Diamond OA publishing. In addition, NIH should indeed follow the example of some private funders such as the Bill & Melinda Gates Foundation, Wellcome, and HHMI, who place increased value on (open or transparently peer reviewed) preprints, as these represent a less expensive publishing process that in addition supports the principles of Open Science in a way that typical corporate publishing does not. Various repositories can be marshalled with minimal investment into managing and accommodating peer-reviewed preprint services, as shown by repository projects from Arxiv to Notify.

**Option 2: Set a limit on allowable costs per publication.** NIH could limit allowable direct costs to \$2,000.00 per publication, including APCs and other fees. This amount is between what NIH found as the average global APC (\$1,235.51) and the average requested in budgets (approximately \$2,600.00-3,100.00), and close to the average for U.S. published journals' APCs (\$2,177.00).

The EDCH does not believe that setting a cap on APCs will contribute to a financially healthy and sustainable publishing environment. First of all, setting a cap implicitly recognizes the arbitrary and untransparent prices that corporate publishers have assigned to their services without ever providing a transparent breakdown of such costs. The lack of enthusiasm of corporate publishers for providing financial transparency has been amply proven by the limited success and discontinuation of the cOAition S price and services transparency framework and its attendant Journal Comparison Service. Secondly, setting a cap will make some publishers increase their prices to meet the cap, while others will see the cap as a baseline they can comfortably rely on while charging authors for additional services. Third, setting a cap will exacerbate current imbalances between researchers nationally and internationally: by setting a cap, NIH will further contribute to imbalances between funded and unfunded researchers in the US on the one hand—with only funded researchers be able to afford the capped price from their research funds—and on the other hand researchers from less privileged countries, who will simply not be able to afford even a capped price. The proportional financial weight of NIH on the global research ecosystem in terms of grants funded is such that an APC cap would have considerable repercussions worldwide, as it would de facto set a baseline price for publishing services for the rest of the world as well. Finally, an APC cap represents an implicit recognition that the cap corresponds to a reasonable publication cost that does not require any further motivation in terms of price breakdown and transparency.

**Option 3: Set a limit on allowable costs per publication and allow a higher amount to be paid when peer reviewers are compensated.** NIH could adopt the \$2,000.00 limit per publication in Option 1, and allow a higher limit of \$3,000.00 per publication when publishing in journals that compensate peer reviewers at a level equivalent to the average hourly wage reported by the U.S. Bureau of Labor Statistics

The EDCH very much disfavors this option for various reasons. First of all, compensating reviewers would be an invitation to corporate publishers to further monetize the publishing ecosystem. We would be leaving behind the current system that is based on reciprocity: researchers review because they expect their work to be reviewed in turn. A pay-for-reviews system will also introduce perverse incentives to scholarly publishing: in addition to paper farms, a cottage industry of superficial reviewing farms will spring up, causing problems for editors and journals worldwide.<sup>2</sup> Secondly, payments for reviews are very impractical, as they would put a considerable administrative burden on any publisher: it is well known that the micro-payments that compensation for peer reviewing represents result in disproportional administrative costs on those who have to manage it. This will considerably add to the cost of publishing rather than alleviating it.

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<sup>2</sup> <https://www.science.org/content/article/450-question-should-journals-pay-peer-reviewers>

Rather, NIH should develop other measures to value and recognize peer reviews, for example by asking applicants to mention their Open Peer Reviews alongside their publications, or by asking them about their review-to-submission ratio: typically, a researcher should contribute two reviews for every paper they submit to a journal, since every paper requires two reviews. The balance of the reviewing commons must be preserved by valuing, and recognizing it appropriately without financial compensation (see also Chan, T. T., Pulverer, B., Rooryck, J., & CoARA Working Group on Recognizing and Rewarding Peer Review. (2025). Recognizing and Rewarding Peer Review of Scholarly Articles, Books, and Funding Proposals: Recommendations by the CoARA Working Group on Recognizing and Rewarding Peer Review. Zenodo. <https://doi.org/10.5281/zenodo.15968446>)

**Option 4: Set a limit on the total amount of an award that can be spent on publication costs.** NIH could limit the maximum amount of an award that could be spent on publication costs to 0.8% of the award's direct costs over the length of the award or \$20,000.00, whichever is greater, in order to not disproportionately impact smaller awards.

The EDCH would be in favor of setting a progressively decreasing limit on publication costs for APCs charged by corporate publishers and by publishers who do not provide fair publishing solutions to authors who cannot afford their APCs. NIH should consider eventually phasing out payments to such publication services. However, the EDCH would plead for not putting such a limit on the amount that can be spent on Voluntary Author Contributions to Diamond OA journals, with the aim of promoting not-for-profit scholarly publishing whose content-related elements are controlled by the scholarly community. Similarly, there should be no limit on spending on APCs for journals that provide open/ transparent peer review.

**Option 5: Set a limit on both the per publication cost and the total amount of an award that can be spent on publications.** NIH could limit both the total amount of an award that could be spent on publication costs to the greater of 0.8% of the award's direct costs or \$20,000.00 over the life of the award, in addition to limiting the amount per publication to \$6,000.00.

While this option offers authors flexibility, it does nothing to inflect authors' choices towards fair publishing solutions such as Subscribe-to-Open or the not-for-profit scholarly publishing options of Diamond OA. The EDCH strongly believes that the NIH options for the payment of publishing costs should be flanked by measures that increase fair publishing solutions for authors who cannot afford APCs, and not-for-profit publishers who serve the sovereignty of science and scholar-led academic publishing.