

TU9 libraries strive for uniform criteria for open access publication funds. They support the existing *DFG Guidelines for the Use of Funds* and their application to non-DFG-provided publication funds.

More specifically:

- TU9 libraries support the gross €2,000 maximum limit on article processing charges (APCs)
- TU9 libraries oppose partial funding of charges exceeding €2,000 gross
- TU9 libraries support the exclusion of publications in hybrid journals from funding via open access publication funds

This joint position of the TU9 libraries signals both to researchers at universities and to the publishing industry that open access needs to remain affordable for the public domain. A price spiral as seen in subscription costs needs to be prevented. In science policy terms, an arrangement diverging from the existing *DFG Guidelines for the Use of Funds* is considered problematic.

Our recommendation is underpinned by the following arguments:

- If the standard set by the *DFG Guidelines for the Use of Funds* is abandoned by universities, thereby signaling to the publishing side that they differ in their funding policies, the position of science in the DEAL negotiations is weakened.
- If the publishing industry is under the impression that some universities accept APCs surpassing €2,000 gross, price increases will result.
- Experience shows that authors can successfully renegotiate high APCs, bringing them down to less than €2,000 gross by referencing the federal funding limit. This underlines the fact that the APCs set by many publishers are arbitrary and beyond any economic justification. The willingness of publishers to offer discounts is reduced when higher APCs are tacitly accepted.
- Support of hybrid open access implies higher budgetary pressures for universities by means of 'double dipping'. In addition, APCs for hybrid publishing are considerably higher than gold open access; and publications are usually very restrictively licensed and available only for additional costs under Creative Commons licenses. Funding of the hybrid model supports traditional publication models and strengthens existing structures.
- Even when funding of open-access publications in hybrid journals is excluded, open access for the publications involved can be provided cost-free and relatively quickly (usually a 12 month embargo) via the green road to open access. The institutions have established reliable infrastructures to support the green road.

TU9 libraries also strive for uniform criteria for contributions in open access anthologies and open access monographs, and will present specific recommendations in 2019.