

The American Library Association (ALA) and the Medical Library Association (MLA) appreciate the opportunity to provide comments in response to the National Institute of Environmental Health Sciences (NIEHS) recent Request for Information (RFI) concerning the proposed privatization of Environmental Health Perspectives (*EHP*).

The American Library Association (ALA) is a nonprofit educational organization of over 64,000 librarians, library trustees, and other friends of libraries dedicated to improving library services and promoting the public interest in a free and open information society. The Medical Library Association (MLA), a nonprofit, educational organization, is comprised of health sciences information professionals with more than 4,500 members worldwide. Through its programs and services, MLA provides lifelong educational opportunities, supports a knowledgebase of health information research, and works with a global network of partners to promote the importance of quality information for improved health to the health care community and the public.

EHP is a crucial resource on environmental health information and research both locally and globally. The proposed privatization of *EHP* raises a number of concerns, most of which are centered on the loss of no-fee access to the vital information provided to *EHP* readers around the world. Open, unfettered and free access to information collected, compiled or funded by the U.S. Government is a basic tenet of our society and it is important to the well being and security of the nation. Our Associations believe that privatizing *EHP* may result in barriers or restrictions on the ease of access to the publication and the crucial information contained therein.

NIEHS has asked for public input on a number of specific questions. To professional librarians who work with *EHP* readers on a daily basis, three of these questions seem particularly relevant:

Q1b. Are there any difficulties that would be created by transferring publication of *EHP* from a government agency to the private sector? If so, please elaborate.

Yes. Transferring *EHP* to the private sector may create difficulties, even obstacles, for the research community and the public. *EHP*, as noted in the RFI, is one of the most well-regarded and fundamental publications in the field. Our Associations strongly commend the NIEHS for employing an open-access publishing model for *EHP*, which, along with its inclusion in the Federal Depository Library Program (FDLP), has helped to both increase access to the journal as well as to preserve the content for educators, researchers and the public. Regretfully, privatizing the journal will very likely result in considerably less access to the information found in *EHP* to its primary and secondary audiences, as well as the public. We have previously witnessed significant loss of equitable, public access to information due to privatization, through the imposition of fees, copyright or copyright-like restrictions, and the withdrawal of titles from the FDLP. Even if a noncommercial entity or nonprofit began publishing *EHP*, there could potentially be restrictions or fees, such as membership dues, that would create

impediments to access for users. There may be few entities in the public sector that have sufficient resources to support *EHP* at the levels provided by a government agency, including permanent, public access of the journal's archives.

Q5. How should *EHP*'s current open access policy and commitments to provide content to public archives be addressed in a potential privatization?

One of the five major elements in the privatization implementation plan is "online access," and open access does not appear to automatically be assumed. Our Associations would like to have an explicit description of "open access" incorporated into any statement and/or plan regarding privatization of *EHP*. We would also hope that such access issues, including those related to the journal's archives, would be addressed in negotiations with any potential publisher, and the final selection of a publisher would be contingent upon a commitment to open access, including permanent no-fee access to the journal's archives. Our Associations would also recommend that any potential publishers be encouraged to thoroughly investigate partnership possibilities with the U.S. Government Printing Office through its Federal Depository Library Program.

Q6. Overall, how would a privatization of *EHP* be an advantage or disadvantage to the NIEHS and to environmental health science?

Our Associations believe that privatization would present distinct disadvantages to the vitality and visibility of NIEHS, to the advancement of the field of environmental health sciences in general, and to the education of the field's practitioners and researchers. Experience has shown that privatization does not necessarily enhance global dissemination of information; rather it can inhibit it. When information such as that found in *EHP* needs to reach all areas of the world, there need to be as few access barriers as possible. *EHP* has been an outstanding model for open access and dissemination of information compiled by the government. Privatization would at best compromise the situation and, at worst, significantly reduce access to crucial health and environmental information.

An example similar to *EHP* is the privatization of the Journal of the National Cancer Institute (JNCI). Once privatized, the JNCI became more expensive and less accessible to the public. *EHP* itself provides a related example. For a period of time, access to full text of *EHP*'s online articles required either a paid subscription or at federal depository libraries, individual user logins on the library site with the depository login and password. Some academic libraries opted for site licenses in order to meet the demands of faculty, researchers, students and staff. Given the fact that information published in *EHP* concerns the health and well-being of persons worldwide, we believe that privatizing the *EHP* would, in fact, be contrary to its mission:

"*EHP*'s mission is to disseminate credible environmental and occupational health information around the world. An overarching goal is to raise global awareness of the connectivity between the environment and human health."

Thank you for considering our comments. If you have any questions, please contact Lynne Bradley at the American Library Association (202-628-8410) or Mary Langman at the Medical Library Association (312-419-9095 x 27).

Sincerely,

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