

Response to Plan S from Queen's University Belfast Library Services

Library Services at Queen's University Belfast welcomes the formation of cOAlition S and supports the aim of [Plan S](#) to make publicly funded research fully and immediately Open Access. We welcome the commitment to end hybrid journal publishing and believe that the Coalition should support more financially viable, innovative and transparent business models such as the [Open Library of Humanities](#). Although green open access (OA) via an institutional repository is incorporated in Plan S, we believe there should be a greater emphasis on this route.

Is there anything unclear or are there any issues that have not been addressed by the guidance document?

The areas where we would appreciate further clarity and consideration are listed below.

- Plan S appears to place a strong emphasis on the APC model for Gold open access. How would the Coalition prevent publication-fee and APC based journals from maximising their revenue by simply increasing the number of papers they publish and lowering the standards of peer-review?
- A number of our academics have raised their concerns about a dominant APC model. How does Plan S ensure that unfunded researchers, early career researchers and those working within the humanities are not excluded post 2020?
- We support the call for greater transparency concerning APC costs and agree that they should be capped. It is difficult to understand the justification for charging thousands of pounds per journal article. We also object to the imposition of mandatory page charges and colour charges by certain publishers and scholarly societies. Further clarity is needed on how this APC cap will be implemented in practice.
- We believe the Coalition should be more explicit in its support for not-for-profit, academic led publishing platforms such as the Open Library of Humanities.
- Plan S appears to undermine the role of green open access and institutional repositories. We believe it would be a mistake to diminish the role that green OA has to play post 2020. We believe the UK Scholarly Communications Licence (UK-SCL) should be explored. It would grant researchers the freedom to publish in any journal they choose and still meet the requirements of Plan S.
- Our institutional repository is based on Pure, so clarification would be helpful about whether off-the-shelf products, such as this, will be compliant with the technical requirements for Plan S OA repositories.
- Currently, there are differences in the OA policies of a number of major research funders, which causes confusion for researchers. Therefore, we believe it is vital that the OA policies of the Plan S national funders, charitable foundations and supporters are aligned and hope that the requirements of the new UKRI OA policy will match those for the post 2020 Research Excellence Framework (REF).
- The use of the term "science" in Plan S to cover all disciplines including the arts, humanities and social sciences may alienate some researchers. It would be more inclusive to employ a broader range of terms.
- We would welcome further details about how compliance with Plan S will be monitored because, in our experience, the process of monitoring compliance with existing OA policies is labour intensive, relatively inaccurate and not scalable.
- We believe that the concept of "OA platforms" should be much more clearly defined in Plan S because it is difficult to distinguish them from OA repositories.

Are there other mechanisms or requirements funders should consider to foster full and immediate OA of research outputs?

We believe that the following requirements should be considered:

- ORCID is recommended in Plan S but we believe it should be a requirement for all researchers because of its potential to improve the efficiency of the scholarly publishing infrastructure.
- We commend the endorsement of the San Francisco Declaration on Research Assessment (DORA) in Plan S but greater efforts are required if research is to be judged on its own merits rather than where it is published.

Comments from Queen's academics in response to Plan S.

"We risk excluding authors unable to pay article processing charges."

"Plan S threatens the future of the learned societies and not-for-profit publishers."

"Principle 4 states OA publication fees are covered by funders or universities; my concern is that funding will increasingly be directed toward university research strategies".

"The fact Plan S includes the term 'scientific' opens up possibilities for a University to determine who is or is not scientific".

"I've seen nothing in any of the OA plans that assuages the concerns of publishers and/or scholars regarding OA requirements pertaining to books".

"Plan S seems to be replacing one commercially dominant system with another. What is to prevent the new, for-profit, open access publishers increasing their revenue by publishing as many papers as they can? How does that improve the quality of research?"