

Thank you for the opportunity to provide comments on the cOAlition S plan on the *Guidance on the Implementation of Plan S*. Our comments reflect our mission as a professional organization of scientists and engineers, our responsibility to the membership, our desire to defend the integrity of our scientific publications, and our need to maintain the financial viability of our organization. Our comments outline our concerns regarding the proposed guidance and advancement of Plan S. We do not think that the potential long-term adverse consequences are fully understood.

The Society of Environmental Toxicology and Chemistry (SETAC) is guided by our mission to support and facilitate the development of principles and practices for the protection, enhancement and management of sustainable environmental quality and ecosystem integrity, which is underpinned by our principles and values. Many of the values represented in the goals of Plan S align with our own. We value transparency, which extends beyond open meetings and into open science with a goal of stimulating cooperation, knowledge sharing, and dialogue. We value both scientific and individual diversity, and work to create a culture that ensures opportunity and supports career advancement. However, we have been working towards integrating open science in a way and at a pace that is not detrimental to our operations; and we take umbrage at the rigid open access mandates forced upon us. We also have deep concerns about the effect flipping to a fully open access model would have on the diversity of our author pool, since not all communities (low-income; some less-funded disciplines) will be able to afford the open access fees.

SETAC publishes two scientific journals, *Environmental Toxicology and Chemistry* (ET&C) and *Integrated Environmental Assessment* (IEAM). Both journals are peer-reviewed and ISI-indexed. The publications are key to our identity as a professional organization, and they provide an outlet for the ~5,300 members scientists and engineers from 91 countries across five global regions.

Over the years, both ET&C and IEAM have adapted to many of the changes in publishing. The journal editors work with our Publications Advisory Committee to guide the journals through policy decisions, and both have been keen to advance open data, open materials, and open research. The journals have a data transparency policy, and they encourage authors to publish data in open access repositories. When possible, we include open access subsidization in our fundraising so that we can disseminate workshop results as broadly as possible. All of our outreach documents, all abstract books, several backlist titles and new guidance materials are published under Creative Commons licenses. SETAC enthusiastically embraces the philosophy of open access – it benefits the scientific community. These activities advance our mission, but they do not happen for free.

It takes a team to manage article submissions, correct proofs, ensure search engine optimization, coordinate press releases, solicit new content, track citations, and more. We currently employ a thorough editing process in order to ensure quality. The uncertainty that Plan S casts upon the financial viability of our journals represents a potential threat. There are a number of scenarios that could play out with a move to a financial model contingent on a per-paper fee; for example, the inability to spend as much time on the services we currently provide authors or an increased pressure for the journal to accept papers it might not otherwise.

Preliminary and very rough financial estimates show that it is possible that we can change our journal model and continue operations, but we will not be able to function at the same capacity.

Further, the financial viability of our publications under a Plan S is premised on a number of several uncertain assumptions:

- It assumes that our community of scientists and engineers will be able to afford to publish with us at the same level they do currently. We are concerned because:
 - We have prioritized diversifying our author, editor and reviewer pools. Our efforts to ensure that we have international representation in a journal with high APCs will fail. Scientists in developing world countries will not be able to publish with us, and we will not have any extra funds to support their fees.
 - We will cease to be financially viable if the number of published articles slips significantly. If our community balks at the open access fees, we will not survive.
- It assumes that our editorial operations will continue to operate at current standards. We are concerned that:
 - Transitions to new editors-in-chief would be untenable.
 - Staff retention would be difficult, since there would be little room for cost-of living adjustments, professional development support, and merit raises.
- It assumes the same APC that we currently charge (\$3,000 US). We are concerned that:
 - The cOAlition's goal of standardizing fees or capping APCs could make the move to full open access unviable.
- It assumes that our publishing partner would continue with the same financial structure outlined in our current contract, since the move to a fully open-access model would most likely require a renegotiation of terms.

We support open access. However, our primary goal as a scientific society is to advance our mission and the research in our community. The journals are one forum for doing so; they provide an outlet for scientific exchange and support SETAC operations. We also run workshops, meetings, symposium, certification programs, and spend resources on training and supporting early career scientists and students. We provide opportunities for scientific engagement and communication, support the development of the next generation of scientists, and build capacity in the developing world. When we take a decision to change our publishing model, when we make policy decisions, when we set priorities, it is with the SETAC mission, principles, and values at the forefront. It would be unfortunate to be pushed into a position that would erode our ability to succeed when SETAC and the cOAlition clearly have several common goals.