

cOAlition S
Coordinated by Science Europe
Rue de la Science, 14
1040 Brussels
Belgium



Oslo, 08 February 2019

Feedback on Guidance on the Implementation of Plan S

The Peace Research Institute Oslo (PRIO) acknowledges that the currently prevailing model of scholarly publishing, whereby a large proportion of published research is only available behind paywalls, places limits on the value and impact of research. We therefore also acknowledge that Open Access to research outputs (OA) is a worthwhile aim, and that it is praiseworthy that cOAlition S is attempting to take concrete steps to realise this aim. It is, however, our view that the vision for this transition to OA laid out in the implementation guidelines for Plan S is overly restrictive, unnecessarily favouring one path to OA – Gold or APC-based OA. Further, this favoured approach raises a number of problems that the implementation guidelines fail to address satisfactorily.

In response to the initial announcement of the participation of the Research Council of Norway in cOAlition S, researchers at PRIO and at the Faculty of Social Sciences at the University of Oslo co-authored a report assessing the possible consequences of Plan S for publishing, research quality and research environments.¹ We refer you to this report for more detail on PRIO's concerns regarding the implementation of Plan S. Some of the key points are outlined below.

There is a clear focus in the implementation guidelines on Gold (APC-based) OA, with insufficient attention paid to ways in which funders can facilitate and support non-APC-based financing models, specifically Diamond OA. Diamond OA, where there are no

¹ Carling, J. et al. (2018). *At the crossroads of open access to research: An assessment of the possible consequences of Plan S for publishing, research quality and research environments*. Available at <https://www.prio.org/utility/DownloadFile.ashx?id=1667&type=publicationfile>. Downloaded 05.02.19.

author-facing charges, is a model that avoids many of the problematic features of Gold OA outlined below. Despite this, we find little indication in the implementation guidelines that, and if so how, cOAlition S intends to support this model of OA.

Green OA is also an underdeveloped alternative in the implementation guidelines. The guidelines' discussion of Green OA primarily consists of a comprehensive list of technical requirements, without a corresponding level of detail on how cOAlition S intends to support the development of compliant repositories. It is our view that Green OA can play an important role in a sustainable transition to OA, avoiding unnecessary upheaval for researchers and other key stakeholders. The implementation guidelines for Plan S should, but do not currently, reflect this.

Gold OA is potentially problematic in a number of ways. The implementation guidelines need to address these potential problems:

1. It is far from clear that sufficient funds will be available to researchers to cover APCs. Even in countries with well-funded research institutions, APC funding has proven a challenge. The implementation guidelines for Plan S need to map out a much clearer plan for how this issue will be addressed. While we appreciate that some attempt is made to deal with the problem of access for researchers from low- and middle-income countries, the recommendations on fee waivers and discounts need to be made far clearer and more explicit.
2. In general, a shift from a subscription to an APC-based model implies a shift in who decides who gets to publish and what they get to publish. There is a real risk that the scarcity of APC funding will lead to a situation where these decisions are made by funders on the basis of financial considerations rather than by academic and professional editors on the basis of research-specific considerations (quality, relevance etc.). The implementation guidelines lack sufficient sensitivity to the challenges associated with this shift, which needs to be taken more seriously and addressed in more detail.
3. Making journals or publishers dependent on APCs introduces a conflict of interest between financial sustainability and editorial standards. A financial incentive is created to lower a journal's rejection rate in order to secure enough APCs. For many journals, this dynamic is not a consequence of an attempt to turn a profit, but simply to cover costs. This is a problem particularly for high quality journals, with a high rejection rate, as these will incur higher costs in

connection with handling of submissions. cOAlition S should consider in more detail whether focusing on a Gold model is the best way to maintain quality in the scholarly publishing system.

Aside from issues specifically affecting Gold OA, an especially pressing problem for researchers in a wide range of fields is the lack of high-quality Open Access journals. According to our findings, researchers affected by Plan S will be excluded from publishing in 86% of all academic journals and 97% of journals deemed to be internationally leading by the journal rankings produced by the Norwegian National Board of Scholarly Publishing.² If we focus in on specific subject areas, we see that certain disciplines have no well-established journals that are OA. Even if we restrict ourselves to OA journals, access to Plan S compliant publication channels is extremely limited. Another recent study, conducted by research librarians at the University of Bergen and the University of Tromsø, found that only 8.8% of OA journals registered in the Directory of Open Access Journals are Plan S compliant.³ This lack of available publication channels needs to be taken into account when planning the implementation of Plan S, and the implementation guidelines should address this issue directly.

Given this issue, we are concerned that the proposed timeframe for implementation of Plan S is unrealistic, and that the support offered for journals, publishers and research institutions to develop sustainable models for transition to Plan S compliant OA is insufficient. The implementation plan dictates criteria for an approved transitional route via a transformative agreement, which would render journals temporarily compliant with Plan S, helping them to meet the 1st January 2020 deadline. It is our view that the proposed arrangements are insufficiently flexible to secure a successful transition to Plan S compliant OA. Many society journals, for example, are tied into long publishing contracts, and new business models will be difficult to develop within the proposed timeframe. Facing these hurdles, journals that otherwise may have been willing to consider a flip to OA may feel that this choice is not available to them in practice without incurring undue risk to the financial sustainability of the journal. The implementation plan must allow for a more flexible deadline and more flexibility in the specification of transitional routes to Plan S compliance.

² See Carling et al. (2018): 12-16.

³ Frantsovåg, J.E. & Strømme, T.E. (2019). Few Open Access Journals are Plan S Compliant. *Preprints*. DOI: [10.20944/preprints201901.0165.v2](https://doi.org/10.20944/preprints201901.0165.v2).

Another concern relates to variations between research fields. There is considerable variation between academic disciplines and research fields in relation to OA, both in terms of attitudes and level of acceptance amongst researchers, and in terms of the availability of high-quality OA journals. In their current form, the implementation guidelines do not address this issue, but rather give the impression that the transition to OA is expected to occur in a uniform manner across the research ecosystem. This is an unnecessary and unrealistic expectation. It is our view that the timeline for implementation ought explicitly to take account of these differences and allow funders and research institutions the flexibility needed to ensure a successful and sustainable transition within a realistic timeframe.

We also question the need for the strict licencing requirements outlined in §9.1 of the guidelines. One potential unfortunate consequence of disallowing CC licences with the NC condition, for instance, is that commercial repositories and aggregation services will be free to systematically reproduce content from other providers for profit. It is hard to see how opening for this sort of reuse of scholarly content, which potentially establishes new lucrative revenue streams for major international academic publishers, is in the spirit of Plan S. With regard to institutional repositories, requiring postprints to be archived under a CC BY or CC BY-SA licence would seem to place unnecessary restrictions on researchers' ability to control the dissemination of their own work. It is not made sufficiently clear in the guidelines how this requirement will help to promote Green OA, especially given that a key barrier to the success of the Green model has been a low level of researcher participation. Researchers' concerns about retaining control of their own work will be enhanced at the risk of financial exploitation by third parties.

A final point that demands comment is the reference made in the implementation guidelines to the San Francisco Declaration on Research Assessment (DORA). As the owner and publisher (in collaboration with SAGE) of two leading international academic journals, it is our conviction at PRIO that journals and the editorial work associated with them play a crucial role in research, not least as a key stage in assuring the quality of published research. We question the strict relevance of DORA for an initiative intended to promote a transition to OA academic publishing. We have already seen in a Norwegian setting how the inclusion of support for DORA in Plan S has the potential to make Plan S a vector for other, more radical agendas concerned to deny or undermine the importance of journals, journal editors and even peer review in the research process. It is our view that the implementation guidelines should make clear that this agenda is not the

intended aim of Plan S, and not a necessary stage in a transition to a primarily OA scholarly publishing system.

Best regards

Henrik Urdal

Director

Peace Research Institute Oslo (PRIO)