



Association for the Sciences of Limnology and Oceanography

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To Whom It May Concern:

The Association for the Sciences of Limnology and Oceanography (ASLO) appreciates the opportunity to provide feedback on the proposed implementation guidance for Plan S. The purpose of ASLO is to foster a diverse, international scientific community that creates, integrates and communicates knowledge across the full spectrum of aquatic sciences, advances public awareness and education about aquatic resources and research, and promotes scientific stewardship of aquatic resources for the public interest. With more than 4,000 members worldwide, the society is best known for our journals, interdisciplinary meetings, and professional development programs.

We were pleased to see cOAlition S state in the implementation guidance that “research funders, institutions, researchers, learned societies, librarians, and publishers must work together towards a system of scholarly publishing that is more accessible, efficient, fair, and transparent.” We hope that the coalition will take the comments from all of these entities into consideration as Plan S develops further. We completely agree that any new system of publishing must be **accessible, efficient, fair and transparent**; our comments on the implementation guidance address these overarching goals.

Transparent. You asked the community: “Is there anything unclear or are there any issues that have not been addressed by the guidance document?” The short answer to this is “yes”. Plan S could have a large negative impact on scientific societies because societies use revenue from publications to support professional development, outreach, and other activities. Without some knowledge of OA fee caps it is hard to know if a society like ASLO can conform to Plan S. There is no stated timeframe for the independent study that will inform establishment of APC’s, yet the document says Plan S will be implemented in less than a year. Society business models have to be studied concurrently and taken into consideration when setting APC’s. If the study of fees does not take this into consideration, the planned review of the fees and system for 2023 may be too late for some societies.

Plan S unfortunately treats all scholarly journals alike, and in its current form makes no allowances for the substantial differences that exist across field of study. This includes length and complexity of articles (longer articles require more effort and cost in review, editing and composition), number of articles published annually (journals of smaller scale and resources have less ability to comply with Plan S restrictions, including rapidly changing their business model), and available association resources to offset the financial ramifications of Plan S (again, smaller associations like ASLO are at most risk), and finally the existing open access fee structure already in place for journals, which varies greatly by field of study. In short, the “one size fits all” mandates put forth by Plan S directly defy these realities.

Accessible. ASLO is committed to open science which is more than open access. If ASLO has to substantially reduce its budget to conform to Plan S, our open science initiatives (open data, open code, etc.) will be severely inhibited.

Fair. If ASLO transforms to open access publications, the costs to authors may shut out a segment of the research community that cannot afford OA fees which violates ASLO's value of inclusiveness. We note the plan is requiring waivers for low-income countries and discounts for authors from middle income countries. Will the study of APC charges take this into consideration? Which authors does this apply to? If a fourth author is from a middle-income country, for instance, must the journal provide a discount?

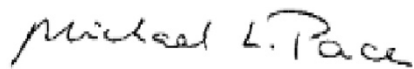
ASLO is an international organization, and we foster and encourage international research collaboration – including publication of multi-institutional studies where one or more of the authors may be under the proposed restrictions of Plan S, with the other authors under no such restrictions. Anything that even remotely discourages these international research collaborations is detrimental to scientific progress and contrary to ASLO's values.

Our concerns with any top down rules about publishing business models remain the same as the ones expressed by ASLO when the Open Access movement first began – these rules disproportionately, negatively impact society or non-profit publishers. The proportion of societies who have transitioned from self-published to publishing with a commercial partner in the past decade has been significant, but not surprising given the costs and challenges of keeping track of and complying to the many different OA mandates. As currently conceived, Plan S could shift the publishing landscape even further away from society journals (whether self-published or through a publishing partner) into the commercial realm.

In closing, publication has traditionally been the core economic activity of societies such as ASLO. Society members serve as journal editors, associate editors, and peer reviewers, ensuring the scientific integrity of the society's publications. Societies give back publication revenues to science via essential value-added services such as scholarly meetings, early-career support and mentoring, science discourse and professional networking, promoting enhanced diversity in STEM fields, sponsoring career-advancing honors and awards, engaging in public outreach, and providing independent educational resources. In a business model that only allows "break even" for publishing, science and researchers would suffer.

We appreciate your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Michael L. Pace". The signature is written in a cursive, slightly slanted style.

Michael Pace, President
Association for the Sciences of Limnology and Oceanography