



Re: ISMRM Society Feedback Regarding Plan S

To Whom It May Concern:

It is with great interest but also considerable concern that the International Society for Magnetic Resonance in Medicine (ISMRM) community has been watching recent development of Plan S regarding Open Access.

The ISMRM is a scientific society of ~9,000 clinicians, researchers, MRI technologists and students who use MRI as a tool in biomedicine or develop MRI technology. About one third of our members are from Europe, 1/3 from North America and 1/3 from Asia. There are two scientific journals affiliated with ISMRM – *Magnetic Resonance in Medicine (MRM)* and *Journal of Magnetic Resonance Imaging (JMRI)*. Both have adopted “hybrid” model of publishing. Our members publish mostly in *MRM*, *JMRI*, though also in other high impact journals. Our members receive at least one society journal with membership, with most having access to a wide range of publications through their institutional libraries. The ISMRM also retains full copyrights to all manuscripts published in *MRM* and *JMRI*.

We fully appreciate the reasons behind Plan S, and, in general, we support this idea as a great concept and a future roadmap to more open and efficient use of public funds in science. However, we also believe that Plan S represents a dramatic change in the way scientific journals and research, as a whole, operate. We are concerned that in the present form the plan may lead to unforeseen problems which, in the long term, may prove difficult to be readily corrected. As a consequence, instead of increasing scientific communication in the global world it may actually inhibit it. In general:

1. Plan S has been conceived and supported so far by slightly over a dozen European countries and similar number of founding agencies; however, it will have profound effect on the rest of the world. We believe that consensus reaching a much wider community should be reached before taking any such drastic measures. Science is often a collaborative effort, and scientists from different continents co-author manuscripts quite often. They also tend to publish in similar or same journals. Plan S will affect these collaborations by trying to enforce European laws on non-European researchers, often creating conflicts, sub-optimal consensus, ultimately making these collaborations much more difficult.
2. The ISMRM is very proud of its journals given the high quality of work published both in *MRM* and *JMRI*. The ISMRM has worked for years to not only establish an excellent relationship with its publisher, but also with its members to establish and, more importantly, to maintain consistency, openness and a high quality with regard to its journals. Plan S obliges about one third of the authors to stop publishing in the most important journals of the society which will be an unprecedented loss to the journals and thus to the society and its members. Conversely, it may result in the publisher issuing an OA journal which may have a high risk of not being successful. It may be also difficult to convince non-European researchers, not obliged to fulfill OA requirements, to publish in newly formed journals, lowering their scope.

International Society for Magnetic Resonance in Medicine

One Concord Center, 2300 Clayton Road, Suite 620
Concord, CA 94520 USA

Telephone: +1 (510) 841-1899 Fax: +1 (510) 841-2340
E-mail: info@ismrm.org Web site: <http://www.ismrm.org>

3. Many international scientific societies have their own journals, and they own the copyrights to the existing manuscripts. What will be the fate of such journals and could they be exempted?
4. As authors we are mandated to publish in journals with high quality and impact. We are concerned that Plan S is not sufficiently specific to address and ensure that it can be achieved in the transition period or even after Plan S is fully implemented. Creating a new journal takes time, patience and significant effort from the publisher, authors as well as the reviewers. It sometimes takes years for a journal to reach stable, high quality status. Newly open OA journals are still unknown commodity in certain fields, restrictions put on publishers may be too severe for them to switch to the OA model, leaving the average author uncertain where to publish her/his work. For example, the impact of so-called “gold” journals has diminished over the last few years, while many journals created in recent years fail to achieve needed outreach and importance.
5. Significant attention in Plan S has been focused on publishing new manuscripts in an open access form. However, a journal’s equally important role is archiving and maintaining the journal contents for many years to come. Plan S does not sufficiently specify how this can be achieved, monitored and financed.
6. The plan is structured around ten principles. The key principle states that by 2020, research funded by public grants must be published in OA journals or platforms. What is the rationale for such a strict rule? Publications in hybrid journals in OA form ensure the rules of open access to those mandated to do so while it provides freedom of choice for the rest of scientific community. The hybrid system has been working for quite some time, has been approved by various funding agencies in North America and seems to be a reasonable solution.

As for the ten principles mentioned in Plan S: they are unfortunately quite vague and not sufficiently detailed to be appreciated by the research communities affected by these changes. In particular:

1. *“authors should retain [copyright](#) on their publications, which must be published under an open license such as [Creative Commons](#)”*

Plan S explicitly specifies CC or CC BY 4 form. Are any other licenses equally supported?

2. *“the members of the cOAlition should establish robust criteria and requirements for compliant open access journals and platforms”*

Will the criteria and requirements be discussed and consulted with all interested parties (scientific societies, universities, publishers)? If yes, what will be the forum of such activity? Who will make final decisions regarding those criteria?

3. *“they should also provide incentives for the creation of compliant open access journals and platforms if they do not yet exist;”*

What specific incentives does cOAlition S have in mind? Financial or other forms? Who should provide incentives?

4. *“publication fees should be covered by the funders or universities, not individual researchers;”*

In many developing countries many researchers already cover such expenses from their own pocket, even in the European Union. Not all universities can afford publishing all accepted papers from their researchers. How would the cOAlition ensure that funders will pay for published manuscripts?

5. *“such publication fees should be standardized and capped”*

Standardization and capping the publication fees even within the same discipline might be difficult to achieve. Journals with high archiving load may have larger expenses. Do standardized fees exclude lower rates for members of scientific societies or researchers from developing countries?

6. *“universities, research organizations, and libraries should align their policies and strategies”*

Again, how do the cOAlition S signatories ensure such alignment? Reaching consensus between hundreds or even thousands of institutions may take years.

7. *“for books and monographs, the timeline may be extended beyond 2020;”*

Why such an extension is warranted only for books and monographs? Are there any further exemptions?

8. *“open archives and repositories are acknowledged for their importance;”*

As previously mentioned, simple acknowledgement of importance may not be sufficient. How do the cOAlition S partners ensure that archiving will be maintained and will be of interest to the journal? How should it be financed?

9. *“[hybrid open-access journals](#) are not compliant with the key principle”*

This ultimate statement may need some explanation why this is the case. In our view, it is a matter of opinion. If the key principle is to make all publications public, coAlition S might have a valid point. However, such principle maybe beyond jurisdiction of coAlition S funders. Hybrid form allows for democratic process, free choice and plurality which also are key principles of the modern world. Similarly, why mirror journals are not allowed either?

10. *“members of the cOAlition should monitor and sanction non-compliance.”*

Do the signatories of Plan S realize how difficult and expensive is a task of monitoring each and every journal? Moreover, what kind of sanctions do the signatories have in mind? Again, it might be a matter of jurisdiction.

Our critique above stems from substantial vagueness of the implementation proposal of Plan S. As researchers we pay attention to details and practicalities. Plan S seems to be good theory but without sufficient details it might be hard to convince research communities that such theory will be successful in practice.

In summary, we fully support the spirit of Plan S, however we are of the opinion that it should be implemented with caution and with the broader agreement with non-European jurisdictions, scientific journals, scientific societies and universities. As society, we would strongly advocate for considering hybrid and mirror journals as viable options after full implementation of Plan S. Moreover, we would suggest more detailed rules and more specific criteria and guidelines for OA journals.

Respectfully submitted,

Greg Stanisiz, Chair, Publications Committee
on behalf of the Board of Trustees of the
International Society for Magnetic Resonance in Medicine (ISMRM)