

Comments on Plan S Implementation Plan

- Overall the Plan S goal of “full and immediate Open Access to publications from publicly funded research” is a worthy one. However, a number of the proposed items in the implementation plan are potentially harmful to the researchers who submit articles to journals and to publishers of scholarly journals.
- The current plan will require publishers to establish Gold OA access journals that cover the same fields of interest as traditional or hybrid journals. These new journals will not have impact factors for at least three years and will take much longer than that to establish the reputation and prestige of those traditional or hybrid journals (if they ever do). Forcing authors to publish in these new venues could be detrimental to the careers of at least some of them. For example, a factor in decisions to grant tenure to younger faculty members is where those individuals publish their work; if their publications are in journals with no impact factor, some institutions will not give them credit for those publications. Other employers/companies also value publications in prestige journals more than non-prestige journals, which can influence the salary of the authors. Although cOAlition members believe “research needs to be assessed on its own merits rather than on the basis of the venue in which the research is published” and that is a worthwhile goal, many organizations do not subscribe to that philosophy.
- It is stated that “cOAlition S does not favour any specific business model for Open Access publishing or advocate any particular route to Open Access given that there should be room for new innovative publishing models.” Yet the restriction on mirror journals states “The journal must not have a mirror/sister subscription journal with substantial overlap in editorial board to avoid business models charging for both access and publication”, which clearly prohibits that business model with little justification for doing so.
- Statements such as “cOAlition S members will collectively establish incentives for establishing Open Access journals/platforms or flipping existing journals to Open Access” seem to indicate a lack of appreciation for the time and effort involved in establishing a new journal, getting it indexed by services such as the Science Citation Index, and creating a reputation that would cause researchers to desire to publish in that venue. The quality and reputation of a journal are often key factors in an author’s choice of journal, and new journals will not satisfy those criteria. Rather than contribute to the proliferation of journals of questionable quality, cOAlition S would be better served by working with established publications to meet the goal of “full and immediate Open Access to publications from publicly funded research.” Supporting the creation of new Open Access journals also runs counter to the statement “cOAlition S does not favour any specific business model for Open Access publishing or advocate any particular route to Open Access”, since providing incentives for particular tactics clearly indicates favour for that approach.
- A statement is made that members of cOAlition S will “sanction non-compliance through enforcing contractual requirements.” What sort of sanction is envisioned? Will researchers lose their funding grants if they believe the dissemination of their research and/or their careers are better served by publishing in a non-compliant journal? Such an approach could easily be construed as an infringement on academic freedom.

- One of the mandatory criteria for Plan S compliant journals and platforms is that “The journal/platform must provide automatic APC waivers for authors from low-income countries and discounts for authors from middle-income countries.” What about manuscripts with co-authors from multiple countries, some of which are not low income or middle income? Is the APC cost based upon the author from the highest-income country or lowest?
- Forcing a requirement that the new “journal must not have a mirror/sister subscription journal with substantial overlap in editorial board” places unnecessary restrictions on the freedom of publishers to provide the best editorial processes to insure the highest quality of their publication. If a publisher has highly qualified editors who have demonstrated the ability to produce prestigious journals, why should it be prohibited from utilizing those individuals from employing their expertise in a different journal (particularly if it is a new journal seeking to establish itself)?
- The statement that “some publishers have established mirror journals with one part being subscription based and the other part being Open Access. Such journals are not compliant with Plan S unless they are a part of a transformative agreement since they de facto lead to charging for both access and publishing in the same way as a hybrid journal does” does not stand up to scrutiny, nor does the general prohibition against hybrid journals. It is highly unlikely that subscription-based journals will disappear in the near future, since many authors will not pay fees in order to have their articles published. Those authors must continue to be served by the publishing community. The publishers must be able to recoup the costs they incur for peer review, quality assurance, online posting and archiving, etc., and so will continue to charge subscription fees for that material. Researchers will also need access to subscription-based content for many years into the future in order to effectively and efficiently conduct their work. An assumption that requiring scientists funded by cOAlition S members to publish only in fully Open Access venues will change that dynamic is incorrect.

Forcing publishers to fully separate open access articles from subscription articles into two completely independent journals with the same or similar topical coverage does not further the goal of making more material freely available. The primary result of that will be an overall increase in costs associated with scholarly publication in each topical area, since separate infrastructure will need to be maintained. A hybrid journal model (or even a mirror journal model) is a much more cost-effective approach.

Rather than trying to ban hybrid journals, a better approach would be to use the leverage of cOAlition S members to negotiate reduced subscription fees based upon the Open Access content published (and for which APC fees are paid). The overall costs of publishing material must be covered in order for publishers to remain viable. Those total costs can be minimized by a hybrid journal approach. To date, there does not seem to have been significant discussions of trading off Open Access content/fees versus subscription prices. Such an approach would be much more sustainable and beneficial to publishers and authors, and move towards the goals of Plan S in a more effective way than that proposed in the current document.

- The statement that “cOAlition S does not favour any specific business model for Open Access publishing” is not supported by the Plan S requirements placed upon journals. Innovative ways of trading off subscription prices and APC fees should be explored, and not prohibited by arbitrary restrictions on the structure of a given journal. Subscription fees for traditional journals will not be going away until the very distant future at best. Since access to that content is needed by researchers, innovative ways of reducing the burden of subscription fees on libraries and institutions need to be

found. The current implementation plan for Plan S does not do this. The overall costs of publishing and the needs of researchers to be able to access scholarly work regardless of where it is published must be considered as a whole. A plan which ignores where the vast majority of technical work is published does not help researchers further their studies, nor assist libraries in reducing the expanding costs of subscription material. Working in concert with publishers to increase the amount of freely available content in conjunction with reductions in subscription fees would best serve the needs of all parties involved.