



**Bristol University Press**

### **Additional Feedback to the Plan S Consultation**

This is a supplement to the feedback already provided by the University of Bristol to the Plan S Guidance consultation and has the approval of the University's OA Steering Group.

As a not-for-profit University Press (incorporating the imprint Policy Press), we are fully supportive of the principles of sustainable open access. We publish Gold Open Access articles and monographs, in addition to having Green OA policies which allow for self-archiving in a range of repositories and non-commercial websites.

We are planning fully open access journals and see opportunities to transition some of our journals to an OA model should they reach a point of sustainability. However, despite our enthusiasm and support for OA as part of our publishing mix, we share the significant concerns of the University about some aspects of the Plan S proposals and the unintended consequences which could arise.

Our key additional points are detailed below.

#### **1. Is there anything unclear or are there any issues that have not been addressed by the guidance document?**

##### **Impact on the social sciences**

As a social science publisher, we feel that Plan S doesn't take account of the considerable differences between social science and STM funding and publishing models. Widespread funding for APCs is not available and Gold Open Access articles make up a small percentage of our overall output. Therefore, it will not be possible to transition the majority of our journals to a sustainable OA model within the tight timeframes suggested in Plan S, or for the foreseeable future, without alternative sources of financing. Whilst the global commercial presses are able to broker 'Read and publish/Publish and read' transformative agreements this would be very challenging for small and mid-sized publishers.

We feel that the hybrid model for HSS works well for social science and that concerns of 'double dipping' are overstated when such a small percentage of the overall content is being made OA. In order to address these concerns, we are supportive of developing transparent policies across the publishing sector to avoid libraries having to pay for OA content.

##### **Plan S and monographs**

The monograph is still the preferred format for shaping and sharing scholarship for many areas of the social sciences and we are concerned about the lack of clarity about extending Plan S to books.

##### **Institutional budgets transferring to OA funding and away from subscription funds**

If library budgets are diverted from subscription funds to large 'Read and publish/Publish and read' deals and to APCs then many publishers, including many University Presses and Learned Societies, could lose subscriptions and ultimately go out of business. This would be a huge loss to the research community given the high-quality publishing services they provide. Conversely, the large commercial publishers own many of the journals publishing STM funded output and are in a strong position to offer transformative agreements and to flip their journals to full OA.

### **Implementation of zero-month Green OA embargoes**

The zero-month embargo requirement in Plan S could also result in social science journals becoming unsustainable via a subscription model. With lower funds available overall, access to Author Accepted Manuscripts via repositories may be deemed acceptable as an alternative to subscription access to the Version of Record. As above this could ultimately lead to important, high-quality journals having to close and leaving far less choice for the social science research community.

### **Publisher added value and quality considerations**

We are concerned that the value University Presses add to the process of disseminating research and the associated costs are not fully acknowledged in Plan S. As a not-for-profit, mission-driven publisher committed to making an impact in the real world our strong reputation, rigorous quality standards, excellent production and marketing services add considerable worth to the author's delivered content. This is typical of the University Press sector as a whole with their focus on cultivating and disseminating knowledge and preserving quality.

Additionally, in our view OA does not automatically lead to engagement beyond academia and we carry out a wide range of activities to broaden the impact of our published output, from media campaigns to policy briefings, research summaries and social media, often making specific subscription content free to access to facilitate this.

There are hefty costs involved in a high-quality University Press operation, from copy-editing, proofreading and typesetting work, to marketing, promotion and discoverability activities needed to ensure content can be found. In the social sciences these costs cannot be met solely through an OA funding model and this means that a mixed model of publishing is necessary for our survival. Most importantly, offering a range of publishing models gives authors choice and an equitable opportunity to publish important work when OA funds and routes may not be easily accessible.

In conclusion, we feel the full impact of Plan S on a wide range of academic publishers, including University Presses, and on the publishing of social sciences content needs a much higher level of consideration.