Plan S is a top-down construct. If implemented, there is a high risk that the result will be lowered quality of research, obstruction of the communication of research to the public and to stakeholders, greater inequality in the opportunity to publish, and a negative impact on young researchers' careers. This all makes Plan S deeply flawed, and unsurprisingly a number of learned societies have vented grave concerns about it (e.g., British Academy, the Royal Swedish Academy of Science, the Young Academy of Sweden, Royal Netherlands Academy of Arts and Sciences; and a sharp critique has also been launched by the president of the US National Academy of Science).

The underlying goal of Plan S – to make the results of publicly funded research available to the public at no extra cost – is one which should be, and is, widely shared. We strongly support actions that take us towards meeting that goal, but we also strongly believe such actions need to be anchored with the research community. A model that by-passes established practices and most likely affects but a small fraction of all research will, we believe, fail to achieve the wider goal of making research publicly available. We think a more fruitful approach is to develop the different routes to OA publishing that are currently used by researchers.

There are two major problems with Plan S: (1) If reached, the goals set out by Plan S will lead to lowering the quality of research and introduce inequality for publishing and (2) Given the weak support for Plan S, tt is highly unrealistic that the goals will be achieved, and Plan S will instead lead to a divided research community in which Plan S-funded researchers are left behind.

Problem 1 (the goals) first: Plan S has been sold as being all about OA, but the truth is that Plan S, as written, *eliminates* popular OA routes, namely publication in hybrid journals and in open archives, and promotes a particular kind of OA, namely pay-to-publish. The conditions under which hybrid publishing and green archiving are Plan S-compliant (as specified in the implementation guidelines) are so stringent that they will function as de facto prohibitions in all but a few exceptional cases. The incentives provided are all tilted towards pay-to-publish journals.

Coalition S refuses to acknowledge the very real risk that a pay-to-publish dominated landscape would lead to a dramatic drop in research quality. High quality OA journals are unusual, and in many fields non-existent; but low quality OA journals abound. In fact, around 75 per cent of all disciplines do not have any OA journals that are of even medium-high quality. OA journals are on average less selective than traditional journals, with less stringent peer review, and acceptance rates around 80-90%. As a researcher, you nowadays get emails every day from low-quality OA journals (often listed in DOAJ) who want you to publish with them (or become their editor!). All this means that they are – with a few exceptions – less prestigious. The research community would rather see many of these journals as de-meriting to publish in. Plan S supporters claim that, in principle, a journal's funding model has nothing to do with its quality. This shows a surprising disregard not only for the research community's ongoing collective efforts for ensuring strong signals of quality, but also for financial incentives. Plan S is all about using financial incentives to change practices, yet there is a blind spot when it comes to the obvious temptation of publishers to slacken quality control in order to increase revenue.

Problem 2 (the risky consequences, given the weak support): Coalition S-funded research makes up 3-4 per cent of the total research output. The belief that this small group of European funders can overthrow the global publishing system is naïve indeed. Moreover, that Coalition S signatories fund 3-4 percent of research output may in fact be an overstatement; Plan S is not legally binding, and some signatories have not anchored their decisions with their governing bodies (Boards of

Directors). Implementation of Plan S thus hinges on approval by the funders' governing bodies – something that is far from certain.

The most likely scenario is that the rest of academia will continue as before, while Plan S-funded research is shut out of the publishing venues that are most reputable and most read in their fields. Plan S-funded research will be less visible and less able to contribute to the research frontier, and Plan S-funded researchers will stand no chance when competing against their non-Plan S national and international colleagues.

The prohibition of hybrid and mirror journal publications suggests that Plan S is not primarily about OA, but about publishing costs. We agree that these costs are too high, but the claim that Plan S will drive down costs is unsubstantiated. In fact, Plan S will imply that researchers have to pay BOTH to read research by their non-Plan S colleagues – which includes the entire US and German market, for example – AND to publish their own research. We are puzzled by the statement in Plan S that "research cannot be monetized in any way", which seems not to align with the requirement of the CC-BY-license, allowing commercial use, and with the existence of for-profit publishers of pure OA journals.

Coalition S gambles boldly on the rest of the world following their lead. Being bold is easy when someone else – in this case the research community – suffers the costs.

Coalition S asked for feedback on how to implement Plan S. Our feedback is: Don't.

Stockholm, February 8, 2019

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