

National Museums Scotland's Response to the Proposed Adoption of *Plan S*

Introduction and Summary

National Museums Scotland is an Independent Research Organisation and our curatorial departments (Art and Design; Natural Sciences; Science and Technology; Scottish History and Archaeology; and World Cultures) publish around 120 items per year. The majority are articles in peer-reviewed journals, both open access and hybrid titles, some of which are listed in the response to Section 4 of the guidance. The remainder of our publications are monographs/book sections, articles in general periodicals, and conference papers.

Funding for our research comes from numerous bodies including UKRI (AHRC, NERC, BBSRC), Royal Society Edinburgh, Scottish Natural Heritage, business sponsorship and donations from private individuals. Our publications can be found on our research repository <http://repository.nms.ac.uk>.

The National Heritage (Scotland) Act 1985 states that National Museums Scotland must “ensure that research on the collections is undertaken and communicated, and to create and share knowledge about them”. The principles of Open Access are at the core of National Museums Scotland’s mission.

Although we support the principle of Open Access and the long-term aims of Plan S, we have some key areas of concern with the proposal to adopt Plan S from 2020. The main body of this response suggests potential solutions to some of these.

- As an IRO National Museums Scotland is not eligible for funding towards APCs and it would not be feasible to pay APCs for the level of publications we currently produce. This would have the inevitable consequence that we would decrease the number of publications we produce. A potential solution would be to ensure that IROs such as ourselves are given funding for APCs as is the case for universities.
- We believe that Plan S adopts a one size fits all approach which does not consider the differences in publications between disciplines.
- Many of our humanities publications use images from third parties such as artists or institutions who rely on income from selling images. Compliance with CC-BY may not be possible if these third parties refuse to comply.
- The payment of third-party image rights can be for fixed lengths of time. In perpetuity rights are currently not available. Any third-party images used in Open Access publications will therefore incur a recurrent cost.
- Heritage organisations like us have been encouraged to diversify their income and often rely on sales of publications such as exhibition catalogues, and images to fund core activities including research and public engagement. The proposals to make monographs Open Access will impact upon this.

Given the above points, we strongly recommend that the implementation timetable for Open Access for journals and conference papers be extended to decrease the chance of unintended consequences.

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

Section 1. Aim and Scope

The guidelines appear to have a one size fits all approach more suitable for the sciences, where open access is more prevalent. They have not considered the nature of publishing in the arts and humanities. Although the aims behind this model are admirable: to make scholarly publishing “more accessible, efficient, fair and transparent”, the timescales are too short to achieve this.

Monographs

More clarity is needed on the timeline for guidance on OA monographs and book chapters.

A requirement to make the exhibition catalogues resulting from Research Council funded research projects OA, would make the business case for their production unviable and would likely result in a decrease in access to the research rather than an increase. This picture is further clouded as the research behind many exhibitions (and their related publications) is often only partly funded by Research Funders.

One option would be to exclude such publications as long as the findings of the research are available through alternative OA publications such as research papers. For many such catalogues, the majority of sales are during the run of the exhibitions they are supporting, and so a second option would be to make their contents OA once the exhibition has closed.

As monographs have a longer lead-in time than many papers, it would be useful for authors and for the publishers we engage with regularly to have a clearer indication of the deadline for compliance.

Section 2. Plan S Compliance

We welcome the potential standardisation of fees and APCs, however more clarity is required on how this will be achieved. More detail is required about the specified conditions referred to in Paragraph 2 in *Plan S Compliance* that permits the deposit of scholarly articles in a compliant repository (as outlined in Technical Guidance 10.1).

Many journals in the arts and humanities are produced at minimum cost. It would be helpful to know the outcome of any risk assessment that has been undertaken looking at the possible impact on quality (the need for more articles per issue, poorer/ less frequent peer-review) which could arise from the standardisation of fees and APCs.

Section 3. Publication Costs

Given the lower number of OA journals in the humanities, and therefore a potentially longer timescale for transformative agreements to enable a move to full OA, the statement that cOAlition S members are not obliged to fund APCs that are covered by transformative agreements is a concern.

Unlike universities we do not get funding to defray the costs of APCs. We believe the only way to make OA workable as outlined under Plan S is to give IROs such as ourselves funding for use on APCs.

We believe the work of the DOAJ is integral to the effective implementation of Plan S. However, currently Plan S do not appear to be funding this development.¹ What mechanism does Plan S have for identifying and signalling whether journals are complying?

Section 4. Supporting Quality Open Access Journals and Platforms

The humanities are not well-served for open access journals and it will potentially take several years to move existing titles to OA or to establish new OA journals. For the journals in which the National Museums Scotland currently publishes there is a reliance on titles published by learned societies and local natural history, historical and archaeological societies, and the impact of moving to OA will have on their journals is unknown, but likely to be significant.

How do Coalition S plan to fill any gaps in disciplines where there is a need to increase the coverage of OA journals? Only 16% of the articles published in the past 2 years were in OA journals and UCL assess that over 80% of journals would currently not be Plan S compliant.² Currently DOAJ lists 12 titles in “museums, collecting and collectors” and only 1 title under “decorative arts”. What will the incentives be to establish OA titles or move existing journals to OA where gaps have been identified?

Will there be a mechanism for Independent Research Organisations/researchers to monitor a journal’s transition from hybrid to full OA? Is the intention to modify [Sherpa/Fact](#) to show the transition progress of a journal? If so, will the Funders support the future development of this resource to assist authors and IROs? These actions would assist authors in selecting compliant journals to approach for future publication.

How does Coalition S plan to establish quality open access journals in all disciplines? What criteria will be used to define “quality”? Impact factors based on citations are very difficult to locate, even in titles from large publishing houses (see Appendix, table 1). Although they are more widespread in the sciences, where open access journals are more prevalent; there are only two journals that have an impact factor greater than 4 (see Appendix, table 2).

We would suggest that as a minimum a journal should be peer-reviewed. However, in the arts and humanities recognition must also be taken of a journal’s long-established reputation and readership. Many of the most respected titles are published by learned societies (or in the case of the Burlington Magazine a not-for-profit charity) and may not be able to or want to flip to an open access mode. This would have a detrimental effect, limiting the options of researchers to publish in the best scholarly journals in their field.

¹ <https://doaj.org/members> - Last accessed 28.1.19

² <http://blogs.ucl.ac.uk/open-access/files/2019/01/UCL-response.pdf> - Last accessed 30.1.19

Museum curators already feel the pressure of having to peer review large articles in a short-time frame for OA journals and this could increase with an anticipated rise in OA titles.

Section 8. Licensing and Rights

Third party content and licensing

The guidance takes no account of copyright or IPR, only Creative Commons.

Use of images – there is recognition that third party content is not affected by Plan S requirements, but guidance on how to comply when a CC-BY licence cannot be applied to the whole article/chapter is required. An author's accepted manuscript, excluding third party content may be a compliant option, but could make an article meaningless. In the unlikely event a heritage organisation or even a commercial company permits the inclusion of their content in an article with a CC-BY licence, will additional funding be available if there is an increased licence fee for use? Licence fees can be time-limited and will have a recurring cost to ensure perpetual access is maintained to the content.

Adoption of a CC-BY licence will lead to a potential loss of income for museums, galleries, libraries and archives, that currently restrict commercial re-use. More restrictive licences are also currently in operation to protect IPR.

Options for consideration:

A CC-BY-ND licence for images and other third-party content would have to be a considered as minimum criteria for compliance in those cases to avoid plagiarism.

We would want to apply a CC-BY-NC-ND licence for content that has been supplied by our image library to protect both our IPR and prevent unauthorised commercial re-use.

Section 10.2 Requirements for Plan S compliant Open Access repositories

More clarification is required on the facility for “automated manuscript ingest” and how it will operate. We would prefer that manuscripts are ingested to a review holding area prior to approval and released by a repository manager.

Full text is predominantly stored in pdf format at present, although publishers may use XML in JATS as the standard for online journals, pdf is the format that authors receive their copies in, or that societies and small publishers provide. This will require changes to our work patterns and technical support from our repository hosts.

2. Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?

Open Access Publication Fees

Where applicable, Open Access publication fees are covered by the Funders or universities, not by individual researchers; it is acknowledged that all scientists should be able to publish their work Open Access even if their institutions have limited means

Will there be a change in the current model of UKRI funding? It is currently based on funding for large HEIs to cover open access costs. For Independent Research Organisations (IROs) there should be recognition, and support towards, the additional costs that will be incurred to comply with Plan S objectives. Both in terms of APCs during the transformative agreement period, but also beyond to cover costs for monograph production and recurring costs for the use of third-party content.

In the humanities there are fewer OA titles and publishing in “hybrid OA titles” may be the only option available while the publishers enter into transformative agreements. The guidance emphasises “that the individual cOAlition S members are not obliged to enter into transformative agreements nor to fund APCs that are covered by such agreements”: will AHRC take account of the requirement to fund APCs in their research areas?

The guidance only refers to open access publication fees being covered by the Funders or the universities. National Museums Scotland as an IRO is not eligible for funds towards APCs. It is not clear whether funds could be made available for this or whether this would be capped at 80% of costs (for match funding). The guidance does not give any indication of whether recurring costs for the use of third-party content would be supported.

Options for consideration:

IROs will require additional funding for APCs, in the same way as that given to larger HEIs, although there are several mechanisms for how this funding could work. An alternative to funding individual IROs, could be a centralised OA pot that IROs can bid into for open access, although processes would have to be established for the administration of such a scheme and the eligibility criteria to be applied.

We wish the funders to consider a proportionate response to open access in order to preserve freedom of access to information but also commercial interests. Could the funders suggest a standard number of academic and non-academic outputs proportionate to the scope and nature of funding?

Was asked too if the demand for full and immediate open access to all research related outputs is essential to achieve the aims of cOAlition S? Would it be reasonable to consider that the outputs that are first revealed are considered for full and immediate open access but that after a period these would no longer be compulsory OA?

Appendix

Table 1.

Journal impact factors of hybrid titles from a selection of published articles 2017-8

Journal Title	Publisher	2017 Journal Impact Factor ³
Britannia	Cambridge	N/A
Journal of the History of Collections	Oxford	N/A
Journal of Design History	Oxford	N/A
Museum Management and Curatorship	Taylor & Francis	N/A
Proceedings of the Prehistoric Society	Cambridge	N/A
Nuncius – Journal of the History of Science	Brill	0.229
Bulletin of the History of Medicine	John Hopkins Univ	0.750
ISIS: Journal of the History of Science Society	Univ of Chicago	1.070
Antiquity	Cambridge	1.656
Journal of Archaeological Science	Elsevier	3.061
Proceedings of the Royal Society B	Royal Society	4.847
Molecular Ecology	Wiley	6.131
Current Biology	Elsevier	9.251
Molecular Biology and Evolution	Oxford	10.217
Science	A.A.A.S.	41.058
Nature	Springer Nature	41.577

Table 2.

Journal impact factor for OA journals with published articles by NMS staff 2017-8

Open Access Journal Title	2017 Journal Impact Factor ³
Open Archaeology	
Science Museum Group Journal	
Journal of Conservation and Museum Studies	
Royal Society Open Science	2.504
PLoS ONE	2.766
Scientific Reports	4.122
Science Advances	11.511

³ Incites Journal Citation Reports <https://jcr.incites.thomsonreuters.com/JCRLandingPageAction.action> - Last accessed 30.1.19