

1. Introduction

- 1.1. SCONUL strongly supports Plan S' core objective of immediate open access to all scholarly publications from research funded by coalition members. We particularly welcome the fact that UK funders UKRI and The Wellcome Trust are signatories and believe that the UK's strong track record in delivering open access to research outputs will be furthered by their commitment to Plan S.
- 1.2. SCONUL members, the academic and research libraries in the UK and Ireland, are strongly committed to working with their home institutions, research organisation partners and other stakeholders to align their policies and practices with Plan S to assist in its effective implementation.
- 1.3. Making the research funded by Plan S signatories fully open access is a public good in itself and will contribute significantly to increasing 37% of UK outputs made freely available to the world immediately on publication, either through Green or Gold OA¹. This will reinforce the UK's leadership position² in the drive towards a fully open access world, alongside other European partners. This has benefits far beyond the funders own base countries by making research outputs openly available to researchers everywhere, including the global south. These direct and immediate benefits should not be overlooked in the debate about Plan S implementation.
- 1.4. We recognise though that the wider aim of cOAlition S partners is to accelerate the transition to a scholarly publishing system that is characterised by immediate, free online access to, and largely use and re-use of scholarly publications. This global aim would obviously be furthered by its broad adoption by research funders across the world and SCONUL strongly supports the mission of cOAlition S to press for other funders to come on board.
- 1.5. In the interim, SCONUL institutions and our partners will need to consider how Plan S might be implemented effectively in an environment in which Plan S funders account for approximately 8% of global research outputs. Critical questions for libraries are as follows:

¹ Jubb, M et al (2017) *Monitoring the Transition to Open Access* December 2017, UUK <https://www.universitiesuk.ac.uk/policy-and-analysis/reports/Pages/monitoring-transition-open-access-2017.aspx> (accessed 7 February 2019)

² Hook, D; Calvert, I & Hahnel, M (2019) *The Ascent of Open Access: An analysis of the Open Access landscape since the turn of the millennium (Digital Science)* https://digitalscience.figshare.com/articles/The_Ascent_of_Open_Access/7618751 (Accessed 8 February 2019)

- How might library and repository infrastructures be developed to support Plan S principles?
- What kind of transitional agreements would be appropriate and deliverable?
- How can costs be controlled in a Plan S environment?

1.6. We attempt to address these issues in response to the questions below.

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

Infrastructure

- 2.1. The requirements for qualifying repositories set out in the Plan S guidance are stringent and specific, with most or all of the UK's institutional repositories falling below these standards. We urge the cOAlition to consider the detailed technical response from COAR³ which identifies some specific challenges with the proposed approach.
- 2.2. We support COAR's view that the definitions of terms such as platform, archive and repository are becoming increasingly blurred and support their proposal that criteria for services should be specified in relation to function rather than type of infrastructure.
- 2.3. We note that there seems to be an underlying assumption at work that publishers are the primary agent with regards to repository deposit. As set out below, we argue that there is a fruitful potential role for self-archiving of AAMs in institutional repositories. As currently conceived, this would be hindered by the adoption of these standards.
- 2.4. **We recommend the cOAlition S consider moving to an approach to the technical specification for infrastructure which is based on specifying outcomes and principles rather than precise delivery mechanisms, which should avoid breaks on innovation and diversity in provision.**

³ <https://www.coar-repositories.org/news-media/coar-feedback-on-the-guidance-on-implementation-of-plan-s/> (Accessed 7 February 2019)

Negotiating access to the scholarly record

- 2.5. There could be unintended consequences of Plan S's foregrounding of the pay-to-publish model. Some of these are highlighted below. **We urge the COalition to consider a more pluralistic approach, foregrounding instead the need for scholarly outputs to be open and accessible at the point of publication.**
- 2.6. Currently there are a number of features of the way that agreements with publishers are negotiated which are material considerations for Plan S funders. These are:
- negotiations are typically held at the publisher rather than journal level
 - negotiations cover access to past as well as present and future research outputs.
- 2.7. On the first of these, Plan S frames its requirements in relation to journals. In the UK and elsewhere, negotiations are conducted at the publisher level as most content is purchased through "big deals" of bundled content. This includes read and publish deals currently being considered as a model for transformative deals.
- 2.8. In the medium to long term, with widespread adoption of Plan S by funders globally, considering compliance at a journal level will be helpful and appropriate. However, in the interim, there are challenges with that approach, whereby a journal that is publishing a large proportion of outputs which are not associated with a Plan S funder may not be in a position to "flip" to an entirely OA operation as it could exclude many of its key audiences. Given that Plan S funders only cover approximately 8% of published outputs, this means that access for researchers to many journals will continue to be available only through subscription.
- 2.9. On the second issue, read and publish style deals which could be considered transformative and which are currently being negotiated for UK institutions cover a range of types of content. These are APCs; the subscription to core content for the duration of the life of the deal; maintenance of access to previously purchased content and access to content additional to core holdings included in the big deal. Negotiations aim to cover all of these types of content for a single fee.
- 2.10. They have the notable benefit of ensuring that over time, all research outputs at institutions which have signed up to the deal can be published open access in journals covered by that deal.

- 2.11. However there are aspects of this model which are clearly undesirable - in particular it perpetuates unsustainable costs and embeds subscriptions which are counter to the spirit of Plan S. It also throws up significant issues around up front commitment of funds and transfers between institutions. These aspects are covered in detail in Jisc Collections Content Strategy Group's response to this consultation. In the long term, we would wish to see a move away from paying for subscriptions to paying publishers appropriately for the service they provide. However, read and publish and offsetting deals are the best option we currently have for controlling overall spend.
- 2.12. We also note that the 'journal' has long played a role in the formation of disciplines and academic communities. By shifting the economic unit to the article, and making this the unit of discovery also, the role of the journal could be severely diminished. This may have adverse consequences for the broader exchanges of ideas.
- 2.13. **We suggest Plan S signatories undertake further work with Jisc Collections on models for transformative agreements.**

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

- 3.1. Moving to the position envisaged by Plan S in which the focus is on pay to publish leaves many challenges around paying for access to past research outputs. We note that this is not an open access issue in itself but an issue about the affordability of providing access to the full scholarly record, past present and future, and changes to OA policies such as Plan S impact on this wider mission for libraries.
- 3.2. While, in a full Plan S world, we would expect publishers to continue to facilitate access to content previously purchased by libraries under perpetual access agreements, there will be a set of content to which libraries would still need to negotiate access. This includes (a) past volumes of those flipped journals which were not previously open access (b) content which was previously included in “big deals” for which libraries don’t have perpetual access rights and (c) journals which are not publishing content from Plan S funders but which researchers still require access to. **This should be material to considerations of what qualify as transformative agreements. It is also material to the proposed timeline for transition.**

Timeline for transition

- 3.3. The guidance sets out a timeline for the transition which looks challenging for the UK context. We believe it is unlikely that these can be met due to quantity of contracts which would need to be reviewed. We are also mindful of the position of learned societies which will need to adjust their business models to take account of Plan S.
- 3.4. **We recommend a more lengthy but staged transition period which takes into account differences in subject area; author and country profile; publisher profile and commitment to global open access among other factors.**

Controlling costs

- 3.5. Progress towards open access has come at a high financial and administrative cost to funders and institutions in the UK. It is not clear that funders and institutions can afford to continue to meet those costs, whether or not UKRI follows RCUK in supporting institutions through an OA block grant. (Expenditure on APCs at least quadrupled between 2013 and 2016, and the average cost of an APC has increased by 16% over the same period)⁴.
- 3.6. Impacts include:
- (a) funding being directed toward the large publishers at the expense of smaller publishers, pure Gold OA journals, OA consortia and new entrants
 - (b) some institutions withdrawing from “big deals” with the larger publishers, restricting their researchers’ access to the latest findings as well as removing their access to past research
 - (c) lack of institutional funding available for research not covered by funding bodies.
- 3.7. Given the challenges over affordability, SCONUL would argue for a stronger focus on routes other than pay to publish for delivering the objectives of Plan S, whether that be green open access facilitated through rights retention or the development of institutional OA presses.

⁴ Earney, L (2018) *Considering the implications of the Finch Report: Open access briefing*, Jisc <https://scholarlycommunications.jiscinvolve.org/wp/2018/10/22/open-access-briefing-paper-considering-the-implications-of-the-finch-report/> (Accessed 7 February 2019)

- 3.8. We strongly support the submission to this consultation from the UK SCL⁵. It sets out how the adoption of its model OA policy can facilitate the aims of Plan S by enabling Author Accepted Manuscripts (AAM) to be made available through the institutional repository immediately on publication, and by allowing licence choice for academics.
- 3.9. **We suggest cOAlition S includes rights retention mechanisms in their guidance as a core mechanism to increase the availability of outputs open access.**
- 3.10. We welcome the price cap proposed for APCs as part of Plan S as an interim measure. At present, there is no evidence that market forces or moral pressure are succeeding in keeping APC costs to a reasonable level. Instead, because of entrenched behaviours around appointment and preferment, Journal Impact Factor (JIF) appears to remain the overwhelming driver behind decisions about where to publish with very limited price sensitivity involved. This allows publishers to charge the APC rate they believe the market will bear. While negotiators do their best to control costs, their scope for doing so is necessarily limited, even with effective collective engagement with negotiations with libraries, HE leaders and funders.
- 3.11. Wholesale adoption of the DORA principles is central to changing this dynamic, but we are currently some way away from this being demonstrable. **Until this is the case, SCONUL believes that funders should not pay the cost of APCs over a certain level.** We note that, given APC costs are not related in any meaningful way to journal production costs or controlled by market forces, setting a cap is very likely have the effect of publisher APC prices clustering near or at the maximum level. This should be expected and planned for.

4. About SCONUL

- 4.1 SCONUL represents all university libraries in the UK and Ireland, irrespective of mission group, as well as national libraries and many of the UK's colleges of higher education.
- 4.2 SCONUL promotes awareness of the role of academic libraries in supporting research excellence and student achievement and employability, and represents their views and interests to government, regulators and other stakeholders. It helps academic libraries collaborate to deliver services efficiently, including through shared services, and to share knowledge and best practice.

⁵ <http://ukscl.ac.uk/ukscl-community-response-to-plan-s/> (Accessed 7 February 2019)

- 4.3 SCONUL members are the academic libraries themselves, with the heads of library service making up the Executive Board which is responsible for governance and for setting the strategy for the organisation. SCONUL also has a number of groups supporting the strategy and ensuring that the academic library community is informed about, and engaged with, the major issues and challenges facing the library sector. This includes the Content Strategy Group which leads on these issues for the SCONUL community.

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