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Responding individually or on behalf of an organisation: Responding on behalf of an organisation

Organisation: American College of Veterinary Medicine (ACVIM) and the *Journal of Veterinary Internal Medicine (JVIM)*, in collaboration with the European College of Veterinary Internal Medicine – Companion Animal (ECVIM-CA) and European College of Veterinary Neurology (ECVN)

Country: United States of America and European Colleagues

ACVIM and JVIM Editors, in collaboration with ECVIM-CA and ECVN, response to Plan S from the perspective of the Journal of Veterinary Internal Medicine

Overview:

The *Journal of Veterinary Internal Medicine (JVIM)* is the official journal of the American College of Veterinary Medicine (ACVIM), the European College of Veterinary Internal Medicine – Companion Animal (ECVIM-CA), the European College of Veterinary Neurology (ECVN) and the European College of Equine Internal Medicine (ECEIM).

Plan S represents a major shift in publication of peer-reviewed science in that it mandates publication of research, albeit currently limited to that funded by 11 European public funding bodies and several private funders, in journals that provide ONLY immediate open access under terms of the Creative Commons CC BY 4.0 agreement. It prohibits authors who receive funding from these bodies from publishing in “hybrid” or subscription-only journals (which represent about 85% of society journals). Currently, the 11 original funding bodies that are members of cOAlition S fund roughly 3.3% of global scientific output, and roughly 4.1% of the world Open Access output, and are all, with the exception of the Gates Foundation, based in Europe.¹ There is movement to include US public funding bodies in the agreement.²

The Plan-S proposal has generated strong debate with positions taken both for and against it. These positions are discussed at length in several places, but notably in an open letter signed by over 1400 European scientists (opposing the plan). Others are strongly supportive of the plan. See the letter and an archive of the discussions on Scholarly Kitchen and in the New England Journal of Medicine.^{3, 4, 5} The Editors of JVIM do not see much value in the Journal, or ACVIM, entering the debate on the larger issues, however the College should consider the potential impact of implementation of this proposal on the Journal and the College. We have sought feedback from our European partner Colleges, who in the short term are likely to be affected to a greater extent than are researchers in the United States.

Journal of Veterinary Internal Medicine specific topics:

The source documents are at the cOAlition-S website.⁶ The comments below, unless otherwise indicated, refer to the likely or potential impact of Plan S on the JVIM.

Current situation: The Journal currently publishes articles only in Open Access (OA), immediate access (no embargo), and under Creative Commons CC BY 4.0 agreement. This is the model proposed under Plan S (with some additional conditions – see below). Our model is sometimes referred to as Gold OA as article processing (publication) charges (APC) are paid by the authors. Referring to the JVIM model as Gold OA is not strictly correct because APC's paid by diplomates of the ACVIM, ECEIM, ECVN and ECVIM-CA are subsidized to a variable extent by these colleges. The Journal is not a hybrid model publication.

The number of articles that this proposal would affect could be substantial – in 2017, 122 of 398 articles published in the Journal were from European Union countries. We do not have data on how many of these articles were funded by agencies that are signatories to Plan S, but will work to develop this information. However, any effect on these authors likely would not deter them from publishing in the Journal. In fact, implementation of Plan S might increase submission rates to the Journal from European authors who are banned from publishing in journals that have hybrid or subscription-only publishing models, which are most of the journals in veterinary medicine and science.

Journal of Veterinary Internal Medicine response:

JVIM has chosen to respond to the review questions posed, by incorporating responses to specific points in two documents. Questions posed were:

1. Is there anything unclear or are there any issues that have not been addressed by the guidance document?
2. Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?

JVIM responses to specific points in the two documents:

Document 1: Plan S. Accelerating the transition to full and immediate Open Access to scientific publications

Key Principle: “After 1 January 2020 scientific publications on the results from research funded by public grants provided by national and European research councils and funding bodies, must be published in compliant Open Access Journals or on compliant Open Access Platforms.”

Journal response: We are supportive of the principle of Open Access publication of science. We have reservations about the impact of the directive that publications must be in only OA journals or OA platforms might have on other society publishers and that it might infringe on Academic Freedom. However, as the Journal is fully OA, we are comfortable supporting this principle.

Bullet point #1. Authors retain copyright of their publication with no restrictions. All publications must be published under an open license, preferably the Creative Commons Attribution Licence CC BY. In all cases, the license applied should fulfill the requirements defined by the Berlin Declaration;

Journal response: The Journal is currently compliant with this item in the proposal, however there needs to be clarity around how Plan S will determine authorship. Is it based on the author (and if so, which author(s) if there is more than one author) or the source of the funding for the project described in the article?

Bullet point #2: The Funders will ensure jointly the establishment of robust criteria and requirements for the services that compliant high quality Open Access journals and Open Access platforms must provide;

Journal response: This is an action required by the “funders”. There is insufficient detail about how this will be done, whether there will be consultation with publishers, what the likely requirements will be and how they will be enforced and monitored for us to support this part of the proposal. More detail is required as such “robust criteria and requirements” could be onerous, financially ruinous and/or ineffective. We do not support this item in the proposal without clarification.

Bullet point #3: In case such high quality Open Access journals or platforms do not yet exist, the Funders will, in a coordinated way, provide incentives to establish and support them when appropriate; support will also be provided for Open Access infrastructures where necessary;

Journal response: Not applicable to the Journal.

Bullet point #4: 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;

Journal response: The qualifier “where applicable” is unclear. The APC should be covered by the funding body or the university (or institution) and not the researcher or the publisher/society. Our concern is that funding of APC’s for authors unable to procure funds for publication of their articles might be redirected to the publisher and/or society (ACVIM).

The initial proposal by cOAlition-S lists 13 public organisations and several private granting bodies. Will this proposal apply to all public funding? If so, how is public funding defined? Is it defined as any funding coming from an institution whose money comes from the national government? Public universities only? Private universities? Will there be a list of public funding bodies? Or is public funding defined as any fund coming from outside the institution performing the study? What about multicenter studies including public universities and referral private hospitals?

Do those rules apply to partially funded studies? If so, what is the minimum of public funding necessary to qualify? Should that include on the other side, that all public funding include OA publication costs?

Bullet point #5: When Open Access publication fees are applied, their funding is standardised and capped (across Europe);

Journal response: Standardising and capping APC's across Europe is unclear. Does this mean that the APC's paid by the funding body are standardised regardless of the Journal in which the research is published? This appears to be the intent, in which case there is no indication of capacity to match APC for a particular journal with the actual cost of publishing that article (i.e. costs including but not limited to production costs, reviewing expenses, editorial stipends, etc). Similarly, would a cap be based on the cost of publication of the article? Would there be geographic variation in the cap? This is an important point as standardisation and capping at too low a level could drive small publishers/journals from the market because they do not have the efficiencies of scale of larger publishers.

Clarification is needed around the defined list of low and middle income countries, which does not always imply an inability to pay for article publication. If the research is funded by public grants, they should be paying for publication particularly if they are European grants

Bullet point #6: The Funders will ask universities, research organisations, and libraries to align their policies and strategies, notably to ensure transparency;

Journal response: What research has already been completed with Universities and funding organizations to align policies and strategies? Does this include universities outside of Europe that have people publishing in journals distributed in Europe?

Bullet point #7: The above principles shall apply to all types of scholarly publications, but it is understood that the timeline to achieve Open Access for monographs and books may be longer than 1 January 2020;

Journal response: No comment, as we do not publish books and monographs.

Bullet point #8: The importance of open archives and repositories for hosting research outputs is acknowledged because of their long-term archiving function and their potential for editorial innovation;

Journal response: No comment other than that the JVIM contract with Wiley requires long term archiving or transfer of archived material should we change publisher.

Bullet point #9: The 'hybrid' model of publishing is not compliant with the above principles;

Journal response: No comment. The journal does not publish in a hybrid model.

Bullet point #10: The Funders will monitor compliance and sanction non-compliance.

Journal response: Compliance by whom and what – authors, editors, reviewers, universities, journals? Quite unclear although the threat is evident.

Document 2: cOAlition S Making full and immediate Open Access a reality. Guidance on the implementation of Plan S.

1. Aim and Scope.
 - a. Journal response: Supportive of the principle of OA publishing but reserved about implement of Plan S.
2. Plan S Compliance.
 - a. No comment. JVIM is currently fully compliant, or substantially so, by being compliant with OA and CC BY 4.0 agreement.
3. Publication Costs - transparency
 - a. Journal response: Unsure how this will contribute to OA if APC's are standardised and capped. Currently, JVIM provides information of APC and subsidies to authors. Financial results of our publishing model and agreement are provided to the Board in the budget and annual accounts.
4. Support Quality Open Access Journals and Platforms
 - a. Journal response: No comment
5. Timeline:
 - a. Journal response: Currently compliant with OA requirement of proposal.
6. Review:
 - a. Journal response: Agreed. Important to review impact and effect of implementation of this model.
7. Compliance and Sanctioning
 - a. Journal response: Relevant to granting agencies. No comment.
8. Licensing and Rights:
 - a. Journal response: We currently publish under the CC BY 4.0 agreement.
9. Open Access Journals and Platforms:
 - a. 9.1 Basic criteria for Plan S compliant OA journal and platforms
 - i. First four dot points and the sixth dot point – currently compliant
 - ii. Fifth dot point: "The Journal must provide automatic APC waivers for authors from low income countries and discounts for middle income countries." The Journal is largely compliant. We would need information from Wiley about which countries are considered "low income" and "middle income."
 - b. 9.2 Mandatory quality criteria for Plan S compliant journals etc:
 - i. Transparent costing and pricing. Journal does not currently publish this information or provide it to authors.
 - ii. Use of DOI's. Journal is compliant.
 - iii. Dot points 3-7. We believe we are largely compliant, confirming technical details with publisher.
 - c. 9.3 Recommended additional criteria for journals and platforms:
 - i. Support of PIDs (eg ORCID). Journal is compliant.
 - ii. Dot points 2 and 3: Working with publisher to confirm

10. Deposition of Scholarly Content in Open Access Repositories:
 - a. 10.1 Requirement for authors and publishers:
 - i. Journal response: We are compliant with all aspects of this point.
 - b. 10.2 Requirements for Plan S compliant OA repositories
 - i. Seeking technical advice from our publisher.
11. Transformative Agreements:
 - a. No pertinent to journal.

Sources:

1. <https://sites.google.com/view/plansopenletter/home>
 2. <https://www.nature.com/articles/d41586-018-06936-7>
 3. <https://zenodo.org/record/1484544#.XFZDfGdLLcd>
 4. <https://scholarlykitchen.sspnet.org/tag/plan-s/>
 5. <https://www.nejm.org/doi/full/10.1056/NEJMms1900864?query=TOC>
 6. <https://www.coalition-s.org/feedback/>
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