The University of Manchester response to the implementation of Plan S

The University of Manchester (UoM) is firmly committed to Open Access (OA) publishing as a necessary component of the wider open research environment. As such we strongly support the principles of Plan S as a means of increasing the volume of research outputs that are fully and immediately OA.

We welcome the challenge that Plan S poses for commercial subscription publishers who have seen profits increase significantly as a result of a pro-Gold OA position in the UK over the past decade. The relatively ambitious timeline for adoption injects a sense of urgency to address the significant costs associated with academic publishing which continue to plague the sector, and in particular Library budgets, despite the best intentions put in place following the [Finch Report](.).

We are pleased to note the cOAlition's support for the San Francisco Declaration on Research Assessment (DORA), to which the University was one of the first signatories, which aligns with UoM's commitment to responsible metrics.

A significant proportion of UoM research is subject to existing funder OA policies. The University Library has enabled Gold or Green OA for more than 3000 papers annually since 2016 and we achieve high levels of funder compliance (currently over 90% for the UK REF OA policy). Since 2012 we have supported publisher experimentation with OA models and contributed to the development of the UK-Scholarly Communication Licence (UK-SCL). This experience, together with responses from a University-wide consultation on the implementation of Plan S, informs our comments and concerns detailed below. The 'Supporting Document' section includes further consultation responses from UoM researchers.

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

Affordability
Costs associated with publishing are currently too high. This applies to both subscription costs and OA costs. We currently spend c£1.5m on Gold OA which covers costs for only 1/5 of our outputs.

Although we cannot be certain about the costs of implementing Plan S we are, nevertheless, concerned about affordability both during the transition and longer term. We appreciate the attempt to constrain costs but there are too many unknowns for us to be confident that any of the business models supporting Plan S will be affordable and sustainable.

Short-term

We foresee a significant financial outlay on transformative deals during the transition period due to UoM's publishing profile (almost 50% of UoM papers are published by Elsevier, Springer-Nature and Wiley annually). We are also concerned that the timing of such deals does not align with the allocation of block grants from funders and that the financial risk falls on institutions.

Long-term

Since Plan S supports the development of new academic publishing models it is unclear what we are transitioning to. Given the low percentage of global outputs funded by cOAlition S funders it is difficult to imagine that publishers will flip 100% of their journal portfolio to full OA by the end of the proposed transition period. Transformative deals ('Read and Publish') may then be the preferred long-term alternative as they offer 100% Gold OA per publisher at an institutional level.

Early indications are that such deals will not be sustainable and without significant price reductions it is very unlikely that UoM will sign up beyond the proposed transition period. To do so would prevent a reallocation of funds away from commercial publishers towards alternative OA options. On this point we wish to highlight that shifting institutional content budgets to support OA costs needs further consideration. We agree with this shift in principle but ensuring ongoing access to subscription backfiles is vital and these backfiles are currently included in subscription packages.

We note that there will be a study of costs, and support the principle that Article Processing Charges (APCs) should be capped. However, we would stress the urgency attached to this work to inform financial forecasts and demonstrate that a fully Gold OA future is affordable and sustainable. Consideration of the role of initiatives such as SCOAP3 in the transition and longer term would also be useful.

Although not yet in scope, any discussion on affordability needs to consider the impact of extending the OA requirement to monographs. A timeline and cost-modelling at the earliest opportunity would be helpful.

Green OA

We are concerned that the mandatory technical requirements for repositories place an unreasonable burden on institutions and add to the cost of compliance. While we agree that the requirements add value, at an institutional level they should be recommended rather than mandatory.

Clarity on the role of repositories and publishers in fulfilling requirements is also needed. In common with other institutions, we are dependent on commercial vendors cooperating to ensure repository compliance criteria are met.

Humanities and Social Sciences

We urge consideration of disciplinary differences both in the timeline for adoption and the scope of content affected by Plan S which gives the impression, in its present form, of addressing STEM research much more than HSS. We have two suggestions: firstly, that Plan S recognise that HSS will move in a more iterative manner towards a fully OA future, and secondly that there should always be a way to handle policy exceptions. The practice of allowing exceptions in the current UK REF OA policy may be useful in this regard. Flexibility in Green OA requirements for HSS would also be welcomed.

The licence requirements continue to cause anxiety. While the guidance attempts to address the concerns raised on the perceived risk associated with CC-BY, we believe that consideration should be given to the use of less liberal Creative Commons licences and embargo periods during the transition period, both of which we think would provide helpful reassurance.

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

We note that the guidance highlights the importance of "a diversity of models and non-APC based outlets". Clarification on these would be helpful but in the absence of this we provide examples that we see a continued role for. For Gold OA, supporter initiatives such as the Open Library of Humanities. For Green OA, the UK-Scholarly Communication Licence (UK-SCL).

We support engagement with learned societies and university presses on the development of Plan S compliant options as a means to enabling a diverse scholarly publishing ecosystem. The focus on APCs as a mechanism to achieve Gold may be preventing wider and more helpful conversations about all possible options, and instead fuelling anxieties about unsustainable item-level prices and costs.

On the assumption that not all publishers will move to zero embargo before the launch of Plan S, explicit endorsement of the UK-SCL would be useful to support institutions preparing to adapt to non-exclusive licences.

Supporting Document

Colleagues from each faculty were invited to contribute feedback. Responses represent a very wide range of humanities, science, engineering and medical disciplines. While the tone of responses was demonstrably positive, the following concerns were raised.

Costs

It is evident that Plan S will have financial impact at several levels. Yet we do not have the impression that any modelling of the consequences for universities, libraries, journals and scholarly societies, let alone individual researchers or research groups, has been carried out at all.

Possible policy exceptions

Fixed term researchers on funded projects may get papers accepted during a period when they are between posts. It is unclear to us whether such papers fall under the scope of Plan S.

There could, in principle, be issues for authors if they collaborate with other researchers that are not funded by Plan S members, e.g., if the lead authors choose to publish in a non-compliant journal.

Will research published in languages other than English be affected? These specialist outputs are often published by small societies or presses.

Funder platforms

Funder platforms are not currently a good publishing strategy for programmatic research, e.g., favouring reports which take a long time to produce and so delay access to findings. There is also potential for such platforms creating an unhealthy power-dynamic between funders and academics, e.g., funders determine content, eroding creativity and autonomy of scientists.