

My name is Birgit Meyer, and I am a professor of religious studies at Utrecht University. I am active as president of the *Nederlands Genootschap voor Godsdienstwetenschap* (NGG) and am active as member of the board of several journals in my field (including *Africa*, journal of the International African Institute), and I also was co-editor of the journal *Material Religion* (until December 2018).

I presented my reservations with regard to Plan S during a meeting organized by the KNAW on 1 November in Amersfoort (<https://www.religiousmatters.nl/buildings-images-and-objects/article/debate-on-plan-s-open-access-science/>) during which Robert Jan Smit was also present, and published an opinion piece in the Dutch newspaper NRC (<https://www.religiousmatters.nl/buildings-images-and-objects/article/open-access-via-plan-s-nwo-please-listen-to-your-researchers/>). I do not want to repeat all the points made there, and will confine myself to raising some issues arising from the Implementation Guide document.

But first I would like to state that I find it problematic that the issue of open access via Plan S is strongly ideologized, in that its proponents make it appear as if criticisms indicate conservatism, and thus can be laid aside for the sake of the progress that is to be achieved via Plan S. I do not think that a serious intervention as Plan S, that will have fundamental repercussions for the ways in which we publish and share our academic work, should be discussed in such a framework. I trust that critical feedback will not put aside as conservative by Science Europe. As far as I can see, scholars have barely been consulted in the articulation of Plan S, which does not take into account the different publication cultures. SSH, my own field, is different from the field of the natural sciences. The “one size fits all” approach will not work with regard to our field, in which we have many small-scale publishers, and subscription rates for journals are usually comparatively low.

I eagerly awaited the implementation guide, and was disappointed. I had expected a much more detailed plan, that would take into account the very different publication cultures, as well as the criticisms that had been raised in public debates about the Plan (see above). In relation to the implementation plan, I want to raise 4 points:

1) Technical tone

The Guidance on the Implementation Document of Plan S does not address the practical implementation of Plan S and its concrete effects for the publication regimes in the various scientific domains. Instead references are made once again to the intentions of the coalition and further plans, and it is specified what counts as compliance. The designers of the Plan do not appear to see yet the concrete consequences of its implementation in the various fields. One gets the impression of being enveloped in a highly risky experiment, with an unclear outcome. The largest part of the document is about technical aspects, that are to some extent difficult to grasp for non-experts as myself. I seriously doubt to what extent the repositories set up by our universities would at all comply with all the technical requirements stipulated by the implementation document, including DOIs, archiving programs, text and data mining, registration in Sherpa/Romeo, full text storage XML in JATS, helpdesk and so on. This is all the more worrisome, as the possibility to comply with Plan S via green access (publication of pre-published version in a repository) would be thwarted by the high technological requirements. This is not realistic.

Feedback point: Make sure that compliance via green access does not become impossible as a consequence of too high technological requirements with regard to the repositories. Differentiate between technological necessities between work published in SSH, on the one hand, and disciplines handling “big data” on the other.

2) BBCY license

The implementation guide document states that the *Berlin Declaration* does not accommodate non-commercial restriction. Fact is that the *Berlin Declaration* does not explicitly address commercial use. An article published in the frame of the BBCY license makes it possible for users to re-use the published material for commercial ends. This has met much criticism on the part of SSH scholars, most articulately by Peter Mandler (British Academy). For the humanities, the use of the license is problematic, especially when books would also fall under it.

Feedback point: Allow other non-commercial licenses.

3) Author-pays-model

Publishing comes with costs. The shift from a model of funding via subscription (a form of crowdfunding, certainly in the case of journals by learned societies) to open access raises many practical questions. Who will pay? It is realistic to expect that open access will imply a shift to an Author-Pays-model (APCs), which is lucrative for the big publishers. How to make sure that the system will not be much more costly than is the case now? Where will the money necessary for APCs come from? How can scholars outside of the regime of Plan S (non-funded researchers, independent scholars, scholars in countries outside of the realm covered by Plan S) get the funding necessary to pay for their APCs? What are the implications of the requirement for researchers under Plan S to publish open access for their international cooperation with scholars outside of the sphere of Plan S who have no funds to pay for APCs? According to the implementation document, “the journal/platform must provide automatic APC waivers” for scholars from the Global South. How with this be organized. Who will pay for this?

Feedback point: please work out a financial model that will make possible diamond access as the default, at least for SSH. Keep publication in hybrid journals open as a possibility for a much longer period.

4) Impact van Plan S voor wetenschappelijk veld als geheel

So far Plan S is binding for a small group of researchers who receive funding from the signatories of Plan S. What are the further implications of the implementation of Plan for the field as a whole? This issue is important especially with regard to the necessary checks of the quality of publications, that may be thwarted by an APC-based model according to which publication of an article is of commercial interest. Simply referring to the DORA declaration is superficial, and fails to take into account the thorough formulation of quality standards within SSH in the Netherlands (largely upon the instigation of NWO) over the past years. It is necessary to think in a much more detailed manner about the implications of Plan S for the existing regimes in which we produce, publish and share our work. These are not set in stone, but evolve continuously, also in response to other requirements expressed by funders (for long this amounted to a strong emphasis on quality, indexed by publication in highly

ranked journals). Plan S potentially clashes with other requirements for good scholarship (next to “good” publications also internationalization).

Feedback point: the overall tone of Plan S – enforcing, taking a “bulldozer strategy” – is not realistic, and will potentially destroy many good things achieved over the past years. Allow for more time, and listen to the researchers and how they think we can realize open access.