

Feedback on Guidance on the Implementation of Plan S

European Communication Research and Education Association (ECREA) has been following the development of Plan S with both great interest and strong concerns.

While ECREA is fully supportive of the overall objective of Plan S – to make research findings and publications resulting from publicly funded projects freely and publicly available – we have serious concerns regarding the implementation of Plan S.

In response to your call for public feedback on implementation of Plan S, we have grouped our concerns and objections under the following headings:

1. Implementation of the Plan S (Jan 1, 2020) is premature – we strongly recommend postponing the implementation

Less than a year before the implementation of the Plan S, several core criteria for journals are not defined and potential problem areas, such as fields which lack high quality OA journals have not been identified. In most crucial areas – securing quality of publications and eligible/participating journals and infrastructure build-up – the Guidance document is unduly vague and open.

The (quick implementation) of the plan appears to be counting on availability of infrastructure – high quality OA journals – although the cOAlition does not have or has not revealed any empirical data on the subject (“gap survey”). The implementation of the Plan S without empirical data would be unacceptable from a scientific point of view, as would its implementation before empirically identified “gaps” have been sufficiently addressed. Implementation should take into account realistic timeframe for development of infrastructure and securing of resources, including human resources, such as editorial boards and development of practices.

2. Insufficient protection of scientists against predatory publishing and profit-oriented publishers with questionable editing standards

The Guidance document and implementation scheme does not offer scholars and researchers sufficient protection. Grant-holders and researchers working on funded projects are forced to publish in journals not according to their reputation within scientific community but according to one sole criteria – specific form of open access, defined by cOAlition. With “reputation within scientific community” we are not referring to impact factor or other dubious bibliographic metrics but to the reputation a journal has in the eyes of academic community for publishing relevant and high-quality research. Most of these journals – at least in our field – are currently subscription-based journals.

The requirements for the Plan S compliance are not sufficiently defined in the Guidance document. The coalition basically outsources compliance insurance to bodies over which it has no direct control and which have failed in the past to protect the integrity of research community by not preventing “predatory publishing” and/or have accepted publishers with questionable editorial practices. The implementation of the Plan S in its current form offers no protection to researchers from such publishers and does not outline
[ECREA](#) | [Chaussée de Waterloo 1151](#) | [1180](#) | [Uccle](#) | [Belgium](#) | [www.ecrea.eu](#) | [info@ecrea.eu](#)

neither bodies nor procedures for reporting, checking and/or sanctioning of dubious publishing practices or journals. It also does not foresee financial or other sanctions for publishers and journals trying to take advantage of the Plan S. These are not simply matters of – as the Guidance document suggests – individual contractual arrangements.

3. Danger of ghettoization of publicly-funded research

The implementation of Plan S as currently conceived forces top scholars (according to grant selection process) to publish research findings of most relevant topics (funded by research grants) in lesser-quality journals. This is particularly true for fields which lack prestigious OA journals, such as ours. One of very likely outcomes of Plan S' implementation is therefore ghettoization of top publicly-funded research, which will become severed from top scholarship from privately funded research, research funded by funding bodies which did not join cOAlition and non-funded, basic or theoretical research.

Additionally, the implementation of the Plan S in its current form is in conflict with evaluation and promotion criteria at universities in many cOAlition countries, which again puts undue pressure on researchers and scientists to negotiate the conflicting demands. These conflicting demands between universities and funding bodies in cOAlition countries should be addressed and resolved before the implementation of the Plan S.

4. Discrimination of already disadvantaged areas and fields

The Plan S pays no attention to difference in funding and publishing practices between for example Natural Sciences and Social Sciences and Humanities (SSH). SSH is already underprivileged in terms of research funding – both in terms of the overall quantity of funds allocated and in terms of budgets of individual grants. The Guidance document does not clearly guarantee that implementation of the Plan S will not result in putting more strain on already limited project budgets within SSH.

5. Endangering development of scientific knowledge in national languages, particularly those of small nations

In its current form, the implementation of the Plan S does not take into account the differences between academic communities and requirements for development of scientific knowledge in non-English national languages. This is especially clear in cases of small nations and small academic communities, where it is unlikely that quality AO journal infrastructure would exist and be sustainable alongside established subscription journals. In absence of compliant (quality) OA journals, the requirement to publish in OA will very likely result in findings from national projects being published exclusively outside of the national scientific communities and in English language, therefore impoverishing production and dissemination of knowledge in national languages.

As a leading European association in the field of media and communication research, we are further concerned that the Plan S in its present form has failed to promote sufficiently EU-oriented agenda. Not only did the plan fail to gain wider support within EU member states and academic communities, it also for example relies on institutions which will be outside of EU jurisdiction for core quality insurance mechanisms (such as DOAJ after Brexit).

ECREA is concerned that the premature implementation of the Plan S will jeopardise the noble drive to open science – particularly given the number OA publishers with very dubious scientific and business reputation, many of which have publicly welcomed and promoted the Plan S.

ECREA is also concerned that the push to payable open access could have long-term negative effects on ability to publish scientific research since it merely replaces one type of access barriers with another type – i.e. access barriers in the form of subscriptions and fees are replaced with even more restrictive ones in terms of sharing ideas and knowledge, such as the need to pay to publish. This might particularly affect disciplines in SSH in which a lot of scientific output comes from research which is not funded by grants and theoretical research. In the light of this, we also ask cOAlition to rethink the basic model, where the costs of publishing are individualised (transferred to authors) and replace it with a model in which the costs are institutionalised (e.g. some sort of subsidies where journals deal with funding bodies rather than with authors).

ECREA urges cOAlition to postpone the implementation of the Plan S until problem areas are defined and solutions provided. ECREA also urges cOAlition to work more closely with academic communities and their representatives – learned societies, scholarly associations and universities. ECREA is more than willing to become a partner in the much needed continued dialogue and contribute to development of solutions which would benefit rather than potentially harm the academic community.

On behalf of ECREA Executive Board,



Ilija Tomanić Trivundža

ECREA president

Brussels, 8 February 2019