



Response to Plan S from the University of Edinburgh

Background

In 2018 researchers at the University of Edinburgh published over 7,000 peer-reviewed research outputs, of which over 1,200 (17%) were known to be supported by cOAlition S partners. The University of Edinburgh is a strong supporter of open access, and during 2018, 5,181 (74%) of the University's research outputs were openly available. The open access rate rises significantly for outputs within the scope of specific research funders' open access policies, for example the REF (90%), UKRI (91%) or Cancer Research UK (95%).

As a large and diverse organisation there is naturally a large variation in the way in which we make our research openly available. From our total of 5,181 open access research outputs we find that 2,959 outputs (or 57%) are published Gold OA – either in OA or hybrid journals - and 2,222 (or 43%) are available as Green OA from our Institutional or Subject Repositories.

The University has consulted widely to find out how Plan S will affect its academic staff, departments and the broader academic community. This response has been informed by the feedback gathered in a series of eight open meetings, which were attended by over 260 staff, held during the period 23rd – 30th January 2019.

Feedback from the open meetings

The overall feeling expressed at the consultation meetings was that the aims of Plan S are laudable and the staff present applauded the willingness of research funders to tackle the fundamental problems that scholarly communication faces today. However, the guidelines and principles of Plan S do not take into account the various differences between the subject disciplines' existing customs and practices of collaboration and authorship. Furthermore there appears to have been no detailed analysis carried out to assess the impact that Plan S will have directly on the economics of academic publishing and there appears to have been little consideration of the indirect effect it will have on academic working practices and collaborations outside the funders and scholarly societies.

The view at the meetings was that there may be a number of unforeseen consequences of Plan S if it is to be implemented as the guidelines currently stand.

Questions

The invitation from cOAlition S to provide feedback on the current Plan S proposals focuses on two specific questions. These were discussed at the consultation meetings.

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

1. International collaboration

Many of our principal investigators believe that Plan S has the potential to harm international collaboration. The fundamental problem is that researchers in other countries (notably the USA, Japan and Germany) are not compelled to follow the guidelines that the cOAlition S funders are going to impose on its grantees.

Researchers from funders and countries not included in Plan S will probably continue to publish in non-compliant high prestige journals. There may be an incentive to not collaborate with scientists that cannot publish in those venues.

We would welcome greater clarification as to how cOAlition S partners intend to manage compliance for researcher partnerships outside of the coalition S partners.

As an example - what would happen when grantees do collaborate as non-corresponding authors with researchers funded elsewhere, and the senior author submits the work to a journal that is not deemed compliant? The co-author faces a tough decision: if the corresponding author does not pay for Gold OA, do they either pay the hybrid OA APCs from their own sources (which flies in the face of Plan S), or withdraw their name from the paper to prevent the institution facing sanctions?

As a suggestion: the open access policy should only apply to cOAlition S funded researchers as corresponding authors, and not when they are secondary co-authors.

2. Fracturing academic publishing

Some journals may not be able to transition in time, and other journals may not be able to switch business models because the economics do not work for that particular title; or perhaps, in the face of global authorship where only a portion of their authors are affected by Plan S, some journals may choose non-compliance. This will have the effect of splitting academic publishing along economic and geographic lines. Those affiliated and funded authors will publish in one set of journals, and those unaffiliated, independent or unfunded scholars will publish in a different set of journals. The consequences of this set of actions are not fully

understood. It is worth noting that this concern could be completely removed by allowing Green OA rather than transitioning all journals towards Gold OA.

3. Economics

Universities will not be able to accurately estimate the full financial implication of Plan S until the proposed 'cap' on APCs is known. The criteria to establish compliant 'transformative agreements' are not clearly articulated, but already libraries are already having to think about, and budget for multi-year contracts with journal publishers.

We would ask that cOAlition S funders are more overt and robust in defining the upper limit of APCs and other publishing changes. What is the mechanism by which this will be enforced? Without these answers we suggest there is risk that publishers may impose significantly increased APC rates or invent new charges.

There is concern that there seems to be a fundamental misunderstanding amongst funders that universities can take money out of subscriptions budgets and re-purpose that money to pay article-processing charges. Universities will still need to license historic content which is under subscription, and until Open Access becomes the global norm, libraries will need to continue to subscribe to licensed content generated in other research-intensive countries which are not yet implementing Plan S. It is foreseeable that commercial publishers will continue to increase subscriptions for this content. The University seeks clarity on who will bear the financial risk of the transition to Plan S.

4. Impact on scholarly societies

The 50+ journal editorial board members and journal editors-in-chief who attended the feedback meetings raised concerns about the implications for society-owned journals that use their income to promote their discipline.

Whilst in certain circumstances it is possible for individual journal titles to successfully flip from a subscription model to fully open access, this may not be easy for every journal.

At the same time, a number of respondents felt that Plan S may be a good opportunity for some scholarly societies to review their business models to become less dependent on library budgets via subscription revenue.

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

1. Green OA

Under the current Plan S guidelines Green OA is not a viable option due to sticking points on the practicalities around technical standards, journal embargo periods, copyright retention and the insistence on CC BY licences:

- The majority of journals will not be Plan S compliant due to journal embargo lengths. Many publishers need to be reassured that 0 month embargoes of journal content are compatible with subscription business models, as has been the case for journals in physics and astronomy since 1991.
- It is understood that the insistence on CC BY licences for authors accepted manuscripts (AAMs) is partly to allow text and data mining (TDM) activities to legally occur; however many researchers in the Arts and Humanities would prefer a No Derivatives (ND) element to the licence to prevent misattribution/plagiarism which is a live concern. Our current understanding is that under a CC BY licence the author to the extent possible waives their moral rights (including the right to object to derogatory treatment of the work) in order to allow modifications, which is not palatable to many authors in the arts and humanities disciplines. Respondents recommended that the use of CC BY licences should be encouraged, but not obligatory and that CC BY-ND be allowed as an option.

When renegotiating journal subscriptions publishers would ideally offer agreements in which there are compliant Gold routes (Read & Publish) and compliant Green routes (no embargo for AAMs) to provide open access. There is concern that within the monopolistic market for information, Gold could quickly become very expensive indeed for research-intensive universities, and so there should always be the option of compliant Green OA, to release this pressure.

2. Responsible metrics

One of the best outcomes of Plan S is that it is an opportunity for the responsible use of metrics to be properly adopted by institutions. It was widely recognised that academia as a whole needs to move away from assessing researchers on where they publish rather than the intrinsic quality of their work. We note that cOAlition S supports the intentions of the San Francisco Declaration on Research Assessment (DORA), however we would like to see clear guidance and support from research funders to help institutions move in this direction of travel.

The University of Edinburgh's Summary Position

The University of Edinburgh is an early adopter of open access and already makes the majority of its research open, equally through both the Green and Gold routes. The University feels that a change must be made to the current model for academic publishing, as this restricts access to research, is overly costly and unfit for the digital age. The prohibitive cost to view articles and embargo periods stifle impact and the universal spread of knowledge.

Therefore, the University of Edinburgh fully supports Plan S and the timeframes set down by cOAlition S. We recognise that Plan S is an opportunity to harmonise open access policies across funders - which is highly desirable. We also recognise that there will be a period of disruption as Plan S is implemented.

However, we need to address the academic staff concerns about risk to co-publishing work with collaborators in non-Plan S regions of the world. We would ask that there is clarity on how international collaborations are handled. In addition, we would want clarity on who carries the financial risk for institutions that occur due to changes in the publishing model.

We would ask for the following specific changes to be made to Plan S:

1. That researchers are allowed the flexibility to use either CC BY or CC BY-ND at their discretion.
2. Continue to allow articles to be published in hybrid journals without restriction for a transition period to allow more time for publishers to change their publishing models.
3. Allow articles to be published green open access and create a transition period for green open access platforms to comply with the new technical requirements.
4. Detailed requirements around the technical standards (e.g. XML in JATS format) will rule out the majority of current institutional and subject repositories. This should be recommended by Plan S but these technical standards should not be mandatory from the outset.