

8 February 2019

## Comments on Plan S Implementation Guidance

The International Association of Scientific, Technical and Medical Publishers (STM) welcomes the opportunity to comment on the recently published guidance to implement Plan S. Underscoring our response is the fact that STM is strongly supportive of Open Access, and of the overriding ambition of Plan S to expand access to peer-reviewed scholarly works, maximising their value and reuse.

STM supports publishers in their mission to advance research worldwide. Together as partners in research and policy, we serve society by developing standards and technology to ensure research is of high quality, trustworthy and easy to access. STM promotes the important contribution that publishers make to innovation, openness and the sharing of knowledge. For the benefit of the community we provide data and analysis for all involved in the global activity of research. For us, supporting the growth and sustainability of the research ecosystem means embracing change – STM's members are at the forefront of digital innovation, developing and using the latest technologies to make the work they publish accessible and discoverable.

STM members are responsive to the requirements of the academic community, including the development of Open Access models, where there is researcher demand and where this is sustainable. Publishers provide a range of approaches to Open Access and openness more generally, for instance through Green and/or Gold routes, and related sharing and licensing solutions. STM's support for Open Access sits within the context of publisher support for the wider Open Science and Scholarship agenda, for instance FAIR (Findable, Accessible, Interoperable, and Reusable) data and reproducibility.

### Overview

Upon the publication of Plan S in September, STM issued the following [statement](#). Our response to this feedback opportunity builds on the initial statement, by highlighting outstanding queries and issues related to our shared goal of promoting the advancement of research.

In order to clarify and develop the guidance, we suggest a focus on Plan S' ultimate objective: an increase in global Open Access to research outputs. STM would advise that in order to best achieve this outcome, the Plan S guidance maintains flexibility in the stipulations it places on the academic community. It seems intuitive that a more flexible approach towards Open Access models would lead to higher volumes of openly available research overall. We understand that similar concerns have been raised throughout scholarly communication and academic communities (see, e.g. see <http://blogs.ucl.ac.uk/open-access/files/2019/01/UCL-response.pdf>).

Below, we have provided suggestions for ways that the guidance can best achieve these goals:

- Prioritise the researcher community as a key stakeholder in research output
- Clarify and maintain flexibility to allow for differing Open Access models
- Ensure that individual signatory funders may take varied approaches to implement Plan S
- Be flexible towards the wider publishing, platform and repository communities
- Maintain the freedom to choose business models, and complete flexibility regarding parameters that underpin innovation, marketing and competition, including product choice, product and service innovation, funding and payment mechanisms and price.

### **Prioritise the research community**

STM publishers collaborate with and continually support the research community – the bedrock of scholarly output – in all of its diversity. By extension, STM supports researchers’ freedom to choose the publication in which they wish to publish their research, and our member publishers offer them a variety of ways in which they can make their research open.

Researchers have stated clear preferences for publishing in specific journals. These preferences may be based on metrics and quality indicators which contribute to an author’s career progression, as well as to publish in journals closely connected to their research or research community. Some publishers have provided routes to Open Access in established subscription-only journals through hybrid options, facilitating Open Access in line with author choice. Shutting down this publication option for authors could detract from their ability to immediately publish their work in their journal of first choice if they cannot obtain outside funding. As we have already [seen](#) in some responses to Plan S, this position could also have a negative effect on the goal to support greater openness.

Many authors have specifically [expressed](#) concerns about the risks of misrepresentation or misappropriation via the CC BY license. Publishers will often experiment with providing different licensing options to the author, but they must respect authors’ rights to choose the mode of access and re-use of their work.

STM would recommend that cOAlition S further engages with the full breadth of researcher communities and that their diverse needs are prioritised given their importance to scholarly output. The Plan S guidance would benefit from maintaining a flexible approach towards researchers, respecting and encouraging author choice, in order to strengthen the Open Access movement.

### **Clarify the importance of differing Open Access models**

In our view, and in the view of many in the research community, several of the publishing models that do not appear to be supported by the guidance are in fact legitimate approaches to Open Access, such as hybrid Open Access, green Open Access and mirror journals.

Further, areas of the guidance appear contradictory in their criteria for compliant models. For example, the guidance states that it does not favour any business model, but that any article must be made available with a zero embargo length and under restrictive licensing terms. Many

publishers have found that these terms conflict with the viability of Green Open Access. Public statements by cOAlition S members indicate that they recognise that publishers add value during the publication process; it follows, therefore, that their investment in value creation must be recognised to provide publishers the freedom and ability to re-invest in new and innovative ways of serving the research community.

### **Ensure that cOAlition S funders have flexibility to implement Plan S in consultation with their communities and governments**

Many issues presently appear unclear in the implementation guidance. Some will be addressed by individual funders in their policymaking, but at the same time, the implementation guidance is meant to guide their planning. All stakeholders would benefit from a greater understanding of how cOAlition S envisages the implementation process for Plan S will unfold, and for this to be developed and communicated at regular intervals.

STM does not believe that there is a one-size-fits-all regarding Open Access. Funders should work to avoid any unintended consequences of implementing of Plan S, particularly in consultation with their own research communities and stakeholders. The current rushed implementation timeline could complicate such an effort to avoid negative impacts.

Plan S potentially overlaps significantly with other national policymaking goals, including the priorities of many European countries to promote science, innovation, and commercialisation; protect intellectual property and confidential business information; uphold global trade rules and avoid unnecessary obstacles to trade in procurement contexts, grow the digital economy, stimulate investment and expand exports; to name just a few. Many stakeholders have already been engaged in substantive discussions in these issues for many years before the announcement of Plan S, and will continue to do so in the future. As such, it is imperative that public funders take steps to avoid undermining these efforts.

### **Be flexible towards the wider publishing, platform and repositories communities**

As has been reflected in a range of responses to Plan S and its implementation guidance, smaller publishers and learned societies are concerned about the impact of Plan S on their organisations. This group of publishers have limited resources to meet potentially new and burdensome requirements, both related to publishing policy and technical requirements. Many already publish Open Access content under hybrid models, which Plan S appears to disfavour. Smaller publishers and learned societies may have significant challenges without additional flexibility, which could ultimately affect their ability to serve the communities that they were created to support.

### **Maintain freedom regarding parameters that underpin innovation and enable support for Open Access and Open Science**

Publishers continue to innovate and support diverse research communities, and thereby are active and supportive of openness in all its forms. Any implementation of Plan S should seek to maintain this vitality and openness to change driven by robust market demand. The guidance continues to be

unclear about the approach that will be taken to several of the principles of Plan S which could have significant impact on innovation, marketing and competition, including product choice, product and service innovation, funding and payment mechanisms and price. STM urges cOAlition S, as well as individual funders, to take an approach that allows market innovation and recognises the value of the many services provided by publishers.

Some examples of ways that publishers already work towards Open Access and Open Scholarship include the following.

#### *Immediate access to preprints*

Many publishers support or have formalised policies around sharing of preprints across platforms, archives and institutions. STM would urge cOAlition S funders to consider preprint sharing as an option in order to further encourage and facilitate immediate access to the outputs of publicly funded research. STM will continue to convene stakeholders, including funders, to support efforts in this area.

#### *Education*

Education is a key consideration for cOAlition S. While there is widespread support for the concept of more openness across the academic community, knowledge and understanding of Open Access can be patchy or limited. Publishers make efforts to educate a range of stakeholders about Open Access, Open Science and how research can be communicated. STM welcomes support from funders and other stakeholders in this effort.

In conclusion, STM looks forward to learning how Plan S continues to evolve, and we and each of our members will continue to innovate and advocate in support of Open Science and Scholarship.