

## Feedback to Coalition S on Plan S Implementation Guidelines

Deadline 1 February 2019

- (Dr) Jonathan Tennant, Institute for Globally Distributed Open Research and Education
- (Dr) Mark C. Wilson, University of Auckland; cofounder [Free Journal Network](#) and [Publishing Reform Forum](#), board member [MathOA](#)
- (Dr) Dmitri Zaitsev, School of Mathematics, Trinity College Dublin; cofounder [Publishing Reform Forum](#) and [Free Journal Network](#), strategy at [MathOA](#)
- (Dr) Christian Gogolin, University of Cologne, cofounder [Quantum](#) - the open journal for quantum science; board member [Free Journal Network](#)

*Abstract: We argue that Coalition members should favour, both in words and via their spending decisions, community-controlled, no-author-fee journals over commercially owned journals charging APCs. This is for reasons of fairness, economic efficiency, and sustainability. We see Plan S as a strong statement and step in the right direction, but encourage Coalition members to be more forward-thinking about how they want the future scholarly publishing market to look, and make sure that they are giving due consideration to the non-commercial elements of the ecosystem.*

We are what some might describe as “Open Access advocates” with researcher backgrounds, and are deeply interested in changes to the scholarly publishing landscape. We support the overall goal and principles of Plan S and feel that this latest iteration, in the form of implementation guidelines, is a major step in the right direction for global Open Access (OA). We completely sympathize with the frustration, on the part of the plan’s developers, with the slowness of change towards openness in scholarly publishing. We fully appreciate the context and understand where Plan S comes from, and thus welcome its importance and disruptive potential. We believe that it is an outrage that publicly-funded knowledge is often withheld from the public for private gains, and believe that ownership and control over scholarly communication should be firmly in the hands of the research community and wider public.

However, based on our collective understanding of the wider scholarly publishing ecosystem and the market forces at play, we wish to highlight several points:

The Coalition claims not to favour any particular business model. **However, we believe that this is a mistake.** We are talking here about the expenditure of public funds, and thus there should be a clear commitment to maximizing financial sustainability through making efficient spending choices and the installment of mechanisms that ensure a maximum of efficiency. Not all OA models equally promote quality and equity in research. Because of this, the model of community-controlled “diamond” (no direct author-facing charges) OA journals, run according to the Fair Open Access Principles (<https://www.fairopenaccess.org>), should be explicitly promoted above the “author-facing publication fee” model (with default charges per article (APCs), which must be paid by authors or their supporters unless waived), which is

commonly used by commercially controlled journals. We refer to the thread <https://gitlab.com/publishing-reform/discussion/issues/96> for a more detailed comparison of pay-to-publish vs no-fee OA.

The most basic reason is the motivation behind [Fair Open Access Principle 1](#):

**“The journal has a transparent ownership structure, and is controlled by and responsive to the scholarly community”.**

Long experience has shown that for-profit publishers who own journal titles will tend to prioritize shareholder returns over integrity and quality of the journal. This is understandable and a direct consequence of this business model. They will tend to use the language of “quality” in their advertising, but this is often not backed up by their real-world actions. Instead, they use traits such as the reputation of the journal, often accumulated over decades by the hard work of authors, reviewers and editors, to attract more income, while reducing the quality of their services and running down this reputational capital. This creates a direct tension with the research enterprise, in which quality is based on completely different traits that are entirely divorced from journal branding. Unless for-profit publishers are placed in their correct role as service providers having to fairly compete on price and quality of service, major reform of the scholarly publication system will be extremely difficult, and we will continue to see slow growth towards OA as well as continued extraction of excessive profit margins at the expense of the public purse.

Commercial publishers can often get away with charging high fees while offering insufficient services in the areas of quality control, typesetting, and dissemination for several reasons, one of which is that authors do not have a strong incentive to choose the publishers/journals that they think add the most value or are behaving most ethically. The grant-based funding system and the fact that hiring in academia strongly emphasize the researcher’s publication record, strongly pushes researchers to publish in “reputable” journals, no matter the cost. If the chance of getting a prestigious grant, which may well be pivotal for one’s career, is increased by a certain percentage by publishing an article in a given journal, a rational author will be willing to pay at least up to that percentage of the grant’s total value for a single publication in that journal. This mechanism is already today leading to a rapid escalation of APCs and this will likely only accelerate if regulations further incentivize publication in author-pays APC based journals. We note in passing that this reality undermines the argument that Plan S in any form violates academic freedoms - which we understand based on the UNESCO definitions to have little to do with freedom of journal publication venue - and applaud Plan S in its effort to promote more fundamental freedoms around access to knowledge and ownership of research.

A seemingly attractive way out is to impose caps on APCs, as Plan S proposes. However, there is little understanding of what an APC-based market would and should look like. Any author fee cap must not be based on prices arbitrarily set by publishers based on “what the

market can bear". This is politically and economically irresponsible. Instead, it should be based around what is the best value for money, in terms of quality of the publishing process, where quality and value here must be judged by end users. We are not blind to the potential impacts that disruption to revenues of commercial publishers can have here. However, we strongly believe that the financial security of the for-profit sector of this industry is negatively correlated with the health of the overall market sector, and the sustainability and health of the research enterprise. We therefore believe that those behind Plan S should not be seeking permission from commercial players about what they can and cannot do due to financial risk, and should remain focused on the best interests of higher education, scholarly research, and the wider public.

It is clear [that an APC of more than 500 euros per article is unnecessary in most cases](#); yet among major publishers, average author fees are already more than twice that and rapidly increasing. We have seen before how this leads to a complete lack of financial sustainability through journal subscriptions and the 'serials crisis', caused by commercial publishers, which research institutes around the world are still suffering from. Mandating transparency behind the real costs of production is a step in the right direction, but will not in itself be sufficient to reduce APCs or at least to keep them stable. Even with transparency requirements, setting reimbursement caps based on costs appears to be essentially impossible. Who should be responsible for setting these caps? How fine-grained should the caps be? Should they be set per publisher, per journal or per field of research?

This would not be a problem in a properly functioning market. Unfortunately, the journal market is notoriously uncompetitive. It is true that setting up a new journal is rather easy nowadays with modern technologies. However, it usually takes many years or decades for newcomers to begin to compete with established journals. For example, each journal has a monopoly on its papers (i.e., each paper is non-substitutable), and academia (and particular university administration) is conservative and slow to change its reward systems.

We see Plan S as having the potential to solve this dysfunction, if it takes brave steps in the right direction. Interestingly, during the process of writing this response, the announcement of [AmeliCA](#) promoted a more radical vision for the progress of OA, much more in line with how we feel it should operate (i.e., non-commercial, scholarly-owned, institutionally and governmentally co-operative). Here, rather than spending (wasting) public money on propping up commercial publishers and outdated systems, there is an explicit commitment towards technological innovation towards strong, sustainable and open scholarly infrastructure around journals.

Also, we want to emphasise that it is unfair to expect researchers to sacrifice their own careers in order to achieve OA, and this is especially the case for those who are already marginalised or at higher risk. We welcome the support for DORA (or equivalent) from the Coalition, but until this support is more coordinated and widened to include employers such as universities, researchers will be faced with strong pressure to publish in long-established

journal titles owned by publishers charging large author fees. We have no confidence that this will change soon, unless substantial efforts are made to transform support into systematic practice.

**Independently of the above points, the author-facing publication-fee model has serious drawbacks**, which is why [Fair Open Access Principle 4](#) exists. We now list some of these drawbacks.

- (unfair) Author-facing publication fees effectively exclude authors without research funding support, or those with limited support unwilling to spend their resources on the often substantial fees. Any exclusion of authors, based on criteria other than research quality, inevitably lowers the value to the journal to researchers and the wider community. This undermines the fundamental role of journals to serve as guardians of research quality.
- (unwieldy) We recognise that Plan S supports journals providing author fee waivers; however the reality of having to go through arbitrary rules and time consuming waiver applications limits the practical impact of such waivers. Unless granted unconditionally on request, they are very blunt instruments and it will be close to impossible to come up with eligibility rules that are both fair and practical. Many institutions, even in “wealthy” countries, are unwilling or unable to reimburse publication fees, and low-funding fields such as the humanities and mathematics don’t have the resources in any case.
- (unpopular) Converting subscription journals to the publication fee model in most areas (other than a few well-funded ones) disrupts existing ecosystems and has already led to editors’ frustration and resignations in the past (for example, see the [case of the Central European Journal of Mathematics](#)). The author-facing publication fee model is generally not popular amongst researchers. One reason is the unfairness as mentioned above. Another is that publication-fee journals have clear financial incentives to potentially accept more papers by lowering standards of peer review. By contrast, the Fair Open Access model is supported by many prominent researchers (see for example [this support statement](#)). Researchers who remain apathetic to the APC model, by and large tend to be from well-funded institutes or research groups, and tend not to recognise the systemic discrimination that this model imposes. This is why fairness must be a key consideration, as an underlying principle, for the future of Plan S.
- (unintended consequences) Setting APC caps may encourage journals that do not currently charge publication fees to start doing so in order to generate more income for the same services (for example, see *Ars Contemporanea Mathematica* <https://amc-journal.eu/index.php/amc/article/view/1880/1290>). They may also

encourage publishers to migrate their APCs towards the higher end of the cap, as we saw in the UK for tuition fees.

Many people are concerned that the outcome of Plan S will be domination by large publishers offering publish-and-read agreements, and no improvement over the [oligopolistic](#) and [dysfunctional](#) marketplace that currently exists. Indeed, in the last few months we have seen elements of this already falling into place. Although there is a vibrant ecosystem of low cost, scholar-led “diamond” OA journals (and they make up the majority of OA journals), they mostly operate on almost zero or very low funding levels, plus volunteer academic labour. They are often of high procedural quality, but usually have less name recognition owing to their younger age and lack of advertising/marketing resources. See <https://freejournals.org> for a curated list of examples.

**We feel that the Coalition should be much more explicit in its support for well run outlets using this no-fee OA model.** The technical requirements listed in the latest iteration of Plan S appear to exclude many well known and highly respected scholar-run diamond OA outlets (see the analysis of J-E Frantsovag <https://www.preprints.org/manuscript/201901.0165/v3>). These journals already run on almost no money, and a lot of goodwill and volunteer labour. If these technical requirements are to be maintained (and it is not clear to us that all are necessary), then extra resources must be given to these journals to enable them to comply. One way would be for the Coalition to put substantial resources into supporting the Open Journal Systems software developed by the Public Knowledge Project, which is used by thousands of journals. It is worth here remembering that estimates of the amount spent globally on maintaining the present subscription-dominated system are in the region of [€7-10 billion per year](#). Thus, there is an enormous potential for funds to become liberated and diverted into these initiatives, which would be of wider benefit to the entire scholarly community.

Another major step would be to put resources into infrastructures facilitating transition of existing journals to no-fee OA membership models, such as described here: <https://gitlab.com/publishing-reform/discussion/issues/103> .

These models have already achieved considerable traction. The key is not to convert all possible journals regardless of the costs, but only enough of them to cover researchers’ needs and thereby create fair competition. Given recognized and properly resourced no-fee OA alternatives, researchers will have no reason to publish with expensive subscription or author-fee OA journals. That will provide the currently missing, but sorely needed market mechanism that can put pressure on the remaining journals to offer OA at reasonable prices.

Any such support of the initiatives to create competitive publishing services to be used by societies and independent journals would represent a major step towards creating a functional, scholar-owned, competitive and high quality scholarly publishing market. And also one in which 100% OA is the default.

We believe that only a competitive market with community-run journals and commercial publishers can give us high quality publishing at a fair price. We would like to see Coalition members contribute via direct financial support to the sustainability and infrastructure around consortial models (e.g. Open Library of Humanities, arXiv membership model, direct support for journals operating according to the Fair Open Access Principles) for community-controlled diamond OA journals. We see these as the only fair and viable solution to the current problems of cost and access in scholarly publishing. We believe that scholarly publications are to a large extent a public good, and should be better funded by research funders and institutional libraries. The Coalition has the opportunity here to lead the way. Some organizations that in our opinion deserve funding:

- (members of) [Free Journal Network](#) (membership organization of journals compliant with the Fair Open Access Principles)
- [Open Library of Humanities](#) (charitable organisation dedicated to a model of no-fee OA)
- [arXiv.org](#) (main preprint server in mathematics and physics, essential for scholarly communication in these fields)
- The [Center for Open Science](#) (among other products, OSF preprints)
- [Public Knowledge Project](#) (among other products, Open Journal Systems)
- Scholarly societies providing high quality journals and not attempting to cross-subsidize their other operations excessively via publication income.

It is eminently feasible for the funders behind Plan S to divert funding to supporting these initiatives, rather than propping up unsustainable private/proprietary elements of the present system. Indeed, funding these should be high priority for Coalition members, as they are parts of a move towards a fully operational open scholarly infrastructure. The amounts spent by Coalition members in recent years on APCs would have already had a huge positive impact if instead they had been spent as we suggest.

In conclusion, we call on all coalition members to publicly support the Fair Open Access Principles and lead the transition to a system in which journals fulfilling these principles dominate the scholarly publishing landscape. We fully support the spirit and motivation behind Plan S, and believe that we share the same broad vision for a fairer, more open, more efficient, and more sustainable system for scholarly publishing.

**Attached documents:**

- PDF version of public annotations given to the Plan S Implementation Guidelines via hypothes.is (original and more useful annotations at [https://via.hypothes.is/https://www.coalition-s.org/feedback/#annotations:L\\_m6NPJIEei\\_s9kPE\\_iB0wA](https://via.hypothes.is/https://www.coalition-s.org/feedback/#annotations:L_m6NPJIEei_s9kPE_iB0wA))
- Comments from editors of journals belonging to Free Journal Network



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Hypothesis query: {"url":"https://www.coalition-s.org/feedback/","max":"1000","\_separate\_replies":"false","exactTagSearch":"false"}

▼ 105 Feedback | Plan S

Ales\_Pogacnik 1/15/2019 1:45 PM [in Public](#)

| *CCo*

Not even theoretically possible for living authors under main bulk of continental laws on copyright.

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zuphilip 1/3/2019 2:41 PM [in Public](#)

| *to the extent applicable*

It is unclear how much is applicable. For example: Are the CCo metadata incl. references also part of what you make a mandatory criteria for subscription-based journals with compliant green OA rules in compliant repositories?

An easy solution would be to give each criteria a number which you then can easily reference, e.g. criterias 9.3.a-c and 9.3.g.

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zuphilip 1/3/2019 2:08 PM [in Public](#)

I guess that they are then not seen as platform in the following and therefore cannot qualify as a compliant platform. However, they might be an OA repository and be compliant as such.

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dbrick 1/2/2019 3:04 PM [in Public](#)

Which platform has been canned? The EC one for which there was a tender?

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protohedgehog 12/15/2018 10:43 AM [in Public](#)

| *Automated manuscript ingest facility Full text stored in XML in JATS standard (or equivalent)*

Worth noting the COAR response to these issues now: <https://www.coar-repositories.org/files/COAR-response-to-implementation-of-Plan-S-1.pdf>

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erickpeirson 12/12/2018 1:26 PM [in Public](#)

| *Continuous availability*

What does this mean?

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erickpeirson 12/12/2018 1:26 PM [in Public](#)

| *Helpdesk*

What does that mean?

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erickpeirson 12/12/2018 1:25 PM [in Public](#)

| *core*

What does "core" mean? Core to what?

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erickpeirson 12/12/2018 1:24 PM [in Public](#)

| *Open*

What does "open" mean? Does it mean that it is free to use? Does it mean that authentication is not required?

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erickpeirson 12/12/2018 1:21 PM [in Public](#)

| *solid*

| ...

What counts as "solid"?

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erickpeirson 12/12/2018 1:20 PM [🔗](#) in Public

| *and so on.*

What does this mean?

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erickpeirson 12/12/2018 1:19 PM [🔗](#) in Public

| *solid*

What does that mean?

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erickpeirson 12/12/2018 12:14 PM [🔗](#) in Public

| *seamless*

What does this mean? What are the seams that we are trying to remove?

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erickpeirson 12/12/2018 12:13 PM [🔗](#) in Public

| *PIDs*

Given that DOI does not preempt citation fragmentation, and that the main value proposition for DOI in this context is citation/resource disambiguation, is there further guidance regarding how DOI should be adopted to ensure that cOAlitionS goals are achieved?

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zuphilip 12/11/2018 10:42 PM [🔗](#) in Public

Yeah, the minimum one could try here is to provide just two numbers: APC and total costs. However, even then you might compare these with the surplus reported or how other publisher differ.

Practically I could imagine that DOAJ will provide whether the journals pass this requirements. (I can't imagine that a researcher has to judge this and I don't think the funders want to do this in advance.)

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greboun 12/11/2018 4:24 PM [🔗](#) in Public

| *wider international research community*

the criteria for Plan S entail the risk that journals from the Global Souths are even more marginalized in a new Open Access dominated landscape, with especially journals from the global north publishing mostly knowledge generated in the North being able to fulfill the requirements of Coalition S.

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greboun 12/11/2018 4:17 PM [🔗](#) in Public

| *no copyright transfer or license to publish*

no copyright transfer or transfer of commercial rights or exclusive license to publish

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greboun 12/11/2018 4:15 PM [🔗](#) in Public

| *in the process of being registered.*

this is not a good practice, because it will not be clear if a journal complies until it has been accepted

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greboun 12/11/2018 4:13 PM [🔗](#) in Public

it should state that the copyright should stay with the author(s) without any restrictions. Some publishers ask for transfer of commercial rights and 'leave' the copyright with the author(s). It should also be impossible for publishers to have exclusive publishing rights.

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DanCroft 12/10/2018 10:21 AM [🔗](#) in Public

XML should come from publishers - 10.1, point 6 says "venue where the article is published must comply with the

same quality criteria as compliant Open Access journals" which I'm assuming includes requirement in 9.2 for "machine readable format (XML)".

If not, I agree that not clear how repositories could get/create XML in a reasonable way.

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rafguns 12/10/2018 10:15 AM [🔗](#) in Public

The question is where does this JATS XML version of the publication come from? I assume that the authors are not expected to produce this themselves. I read this part as requiring repositories to have functionality to convert submissions in whatever format (TeX, Word...) to JATS. I guess that is technically possible but not standard functionality in any repository software that I'm aware of.

In short, storing the XML is easy enough, actually producing it is not.

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protohedgehog 12/10/2018 9:59 AM [🔗](#) in Public

| *copyright*

Does this mean fully, exclusive rights? Some publishers abuse this already by requiring 'author nominal rights' transfer, which is essentially equivalent to a copyright transfer, but with some legal fudging. <https://sustainingknowledgecommons.org/2017/01/13/elsevier-as-an-open-access-publisher/>

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protohedgehog 12/10/2018 9:56 AM [🔗](#) in Public

| *(including early view version)*

Indeed, perhaps the idea of 'early view' versions needs to be terminated too, given that it is well known to be used to artificially inflate impact factors? <https://www.scienceopen.com/search#collection/e4870106-eea5-4ba3-88cf-e769c7d49ebe>

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protohedgehog 12/10/2018 9:52 AM [🔗](#) in Public

| *surplus*

What about profit margins too? And how will these data be used to set the APC cap? This sets a dangerous precedence again where the APC is based on a limit defined by operational costs and profit/surpluses, rather than any element of production efficiency or fair market competition.

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protohedgehog 12/10/2018 9:49 AM [🔗](#) in Public

Correct. It should also be mandated that additional charges cannot be levied where unjustified for things like CC BY or copyright retention.

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protohedgehog 12/10/2018 9:47 AM [🔗](#) in Public

This is really interesting, but also strange. Publishers can now simply say something like 'Oh the cost of production is x, and the costs of running the business is y, therefore our APC is z.' The level of transparency needs to be stated too - just general costs, or a per-service/step breakdown.

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protohedgehog 12/10/2018 9:45 AM [🔗](#) in Public

I have also seen concerns from some researchers that they dislike the idea of a CC BY only mandate. Thus, it might be a good idea to have CC BY by default, but with the ability for authors to choose a different license. However, the pros and cons for each license must be explicitly communicated for this.

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protohedgehog 12/10/2018 9:43 AM [🔗](#) in Public

Note that this platform seems to have been canned or put on hold for now.

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dmitri145 12/9/2018 2:53 PM [🔗](#) in Public

Good point, showing that authors are under no pressure/motivation/incentive/choice to make their AAM identical to the published version. Publishers accepting changes and copyediting only in the pdf make it even impossible. Different pages will make it impossible to reliably reference. Authors cannot be relied on. The only way is to force publishers to upload their final version directly, that also saves researchers' time and workload.

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dmitri145 12/7/2018 4:01 AM [🔗](#) in Public

Great point! Unless the current concentration/anti-competitive practice is addressed, or concrete support for specific alternative solutions is provided, innovations are struggling, and even when successful, are vulnerable to acquisitions.

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dmitri145 12/7/2018 3:32 AM [🔗](#) in Public

No-fee OA = Business models: Don't issues with inequity and hampered competition/quality make it more than a business model? Similar to OA vs non-OA?

It seems the lack of sufficient no-fee OA support in Plan S is causing major frustration by many researchers.

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zuphilip 12/1/2018 8:18 PM [🔗](#) in Public

*immediate Open Access to subscription content via open repositories*

It seems that you are more sceptical about the green routes to immediate OA, because only they are part of these review in 2023 besides the transformative agreements. Is the green route only seen as a temporarily possibility?

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jheditor 12/1/2018 11:57 AM [🔗](#) in Public

*not included*

Does this mean such platforms are 'not compliant' or just they are not included in this guidance?

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jheditor 12/1/2018 11:56 AM [🔗](#) in Public

*scholarly content*

It seems this needs clarifying that this refers to the only the scholarly article, not the data, as "research data" and "other research outputs" are excluded from the plan in 1. Aims and Scope

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jheditor 12/1/2018 11:48 AM [🔗](#) in Public

*standards of the Committee on Publication Ethics (COPE)*

I don't think COPE produces 'standards'? COPE focuses on guidelines, process flowcharts, and advisory work, organised by core practices. In any case not clear to me which 'standards' are being referred to here. Also noted in 10.1

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jheditor 12/1/2018 11:46 AM [🔗](#) in Public

*standards of the Committee on Publication Ethics*

I don't think COPE produces 'standards'. It focuses on guidelines, process flowcharts, and advisory work, organised by core practices. In any case not clear to me which 'standards' are being referred to here.

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jheditor 12/1/2018 11:37 AM [🔗](#) in Public

*data, code, and so on*

This seems quite a vague statement about something quite important. Plan S seems quite relaxed about data/code availability and access. If not in Plan S remit, would hope for some link-up to other initiatives setting goals for data and code availability and citation.

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jheditor 12/1/2018 11:33 AM [🔗](#) in Public

This phrasing suggests that such authors are the exception. Thinking of small journals that serve authors predominantly from LMICs - concept is flipped in order to be transparent about costings, i.e. such journals would be permitted to have a 'premium APC' for authors from high-income countries. Their 'standard APC' would be for MIC, with a waiver for LIC.

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zuphilip 12/1/2018 9:24 AM [🔗](#) in Public

Yes. the formulation is very vague here. Our repository supports the SWORD protocol. So. are we fine now? Or do

we also have to do something with this "ingest facility"?

Personally, I don't think that this is within the responsibilities of the funders. It is good to push the publishers that they facilitate/automate the deposit, but the universities with their repositories should be able to decide individually which workflow works best for them.

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zuphilip 12/1/2018 9:17 AM  in Public

*Use of DOIs as permanent identifiers*

Do we really want to allow only DOIs for permanent IDs? What about URNs?

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zuphilip 12/1/2018 9:09 AM  in Public

*Linking to underlying data, code, and so on available in external repositories*

This formulation is IMO bad in several things, also I guess the intension behind is notable: 1. Why does the data, code etc be saved in *external* repositories? A journal could also provide itself a repository for data and code. 2. Why only link to them? It is much better IMO to enforce doing **data citations** and **software citations** inside the paper including a link.

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zuphilip 12/1/2018 8:31 AM  in Public

Both, since it is written "costs and fees".

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zuphilip 12/1/2018 8:28 AM  in Public

There is the SWORD protocol which several repositories supports and for example MDPI does deposit in the institutional repository over SWORD protocol, see <https://www.mdpi.com/about/ioap>.

Moreover, there is for example the project Deep Green: <https://deepgreen.kobv.de/en/project-deepgreen/>

=> Technically this is solved.

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zuphilip 12/1/2018 8:11 AM  in Public

The fee for an insitution in such a transformative deal should change from being calculated based on subscriptions (e.g. number of licensed journals) towards a fee that is calculated based on the number of published articles by that institution.

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farleyas 11/30/2018 8:04 PM  in Public

I would consider it a business model. And I agree that this model should be favored & more highly promoted.

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whitejm 11/29/2018 5:52 PM  in Public

The language seems to coincide with section 10.2, where the repository requirements mention that the repository must have an "automated ingest facility" which I assume means simultaneous submission to the journal and repository in one go, which almost nobody has.

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MsPhelps 11/29/2018 4:19 PM  in Public

What I think is important is to make sure DOAJ can deliver on concrete and objective plan S criteria. that they can indeed deliver capacity-wise, and that their processes are as transparent as possible.

Higher up in the text, it says "cOAlition S intends to work with the Directory of Open Access Journals (DOAJ) (...) to establish mechanisms for identifying and signalling whether journals/platforms (...) are in compliance with the cOAlition S requirements"

I hope this can also include transparant ! financial support to increase DOAJ capacity.

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MsPhelps 11/29/2018 3:41 PM  in Public

This requirement does not apply to the way to compliance through OA in hybrid journals under a transformative agreement, as far as I can tell.

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MsPhelps 11/29/2018 3:39 PM [in Public](#)

Not quite sure about this - as this related to third party content only?

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MsPhelps 11/29/2018 3:34 PM [in Public](#)

The comment linked refers to divergence of preprints from published versions, i.e. case where "the version archived is not the published version nor the AAM". Is there research into differences between AAM and published version?

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DanCroft 11/29/2018 2:56 PM [in Public](#)

Most (all?) repositories deal in XML - JATS is just one flavour of XML. Also it is 'store' XML rather than render - so am assuming that just attaching an XML file to a record would suffice (but it isn't clear)

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DanCroft 11/29/2018 2:53 PM [in Public](#)

The problem it addresses is in Green OA where repository teams ask authors for manuscripts (including discussing what the *right* manuscript, i.e. AAM), manually converting it into PDF, manually uploading it to a repository, and possibly manually reproducing the metadata.

The automated ingest is already done by systems that link up to JISC Publication Router (as I understand it)

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protohedgehog 11/29/2018 2:02 PM [in Public](#)

Good question, this is very unclear.

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protohedgehog 11/29/2018 2:01 PM [in Public](#)

*The negotiated agreements need to include a scenario that describes how the publication venues will be converted to full Open Access after the contract expires.*

Describing a scenario is not the same as actually doing anything active on this issue. This provides little/no actual motivation for hybrid journals to flip to OA, just to describe how they would do it in theory.

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protohedgehog 11/29/2018 12:58 PM [in Public](#)

Also, thinking about this. To what extent is this concordant with the statements about hybrid OA? Aren't virtually all hybrid journals not indexed in the DOAJ, and therefore not compliant with this statement?

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dmitri145 11/28/2018 8:49 PM [in Public](#)

I have seen various personal lists but nothing official.

The FJN has some very precise hard membership criteria that either apply to most good journals or wouldn't be hard to achieve: <https://freejournals.org/membership-criteria/2019-2/>

I think having similar objective and transparent criteria would be better and more impartial than relying on specific organizations, who otherwise would be given too much power, especially of concern if they can be sponsored by publishers.

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dbrick 11/28/2018 5:37 PM [in Public](#)

It is unclear whether "transformative agreements" which are called out below as specifically part of offsetting and read and publish deals also apply to hybrids independent of larger deals. Below, transformative agreements need to be in place by the end of 2021 and last no longer than 3 years. Does that date and timeframe also apply to hybrids outside of offsetting or read and publish deals?

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robeirne 11/28/2018 4:09 PM [in Public](#)

*cited references*

Mentioned once in 9.2 Mandatory, once in 9.3 Recommended

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protohedgehog 11/28/2018 12:09 PM [in Public](#)

Agree with parts of this. Is there an equivalent 'white list' of OA journals that could be used to supplement this to be more inclusive?

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sje30 11/28/2018 10:31 AM [in Public](#)

| *Green*

Oh no. This is the only occurrence of the word "green" in the guidance. There is no mention of "diamond".

I am very worried about diamond OA. Low cost overlay journals sitting on top of arxiv would not comply with the requirements for the repository from what I can see...

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bram\_atmire 11/28/2018 9:38 AM [in Public](#)

| *Automated manuscript ingest facility*

What problem should this address? Does this mean it should require LITTLE or NO involvement from the author? To which extent is this "automation" required?

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sje30 11/28/2018 9:22 AM [in Public](#)

| *Where article processing charges (APCs) apply, cOAlition S will contribute to establishing a fair and reasonable APC level, including equitable waiver policies, that reflects the costs involved in the quality assurance, editing, and publishing process and how that adds value to the publication. To help inform the potential standardisation of fees and/or APC caps, cOAlition S will commission an independent study on Open Access publication costs and fees (including APCs).*

I'm glad to see they have rolled back from a straightforward single cap (which would have been impossible to determine!)

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sje30 11/28/2018 9:22 AM [in Public](#)

the problem i have with this argument is that (at least in my field) I know of no journal that is APC free and decent!

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sje30 11/28/2018 9:20 AM [in Public](#)

| *PubMed*

do they mean pubmed or pubmed central?

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sje30 11/28/2018 9:20 AM [in Public](#)

| *Full text stored in XML in JATS standard (or equivalent*

This worries me; which repository does this for life scientists? (Biorxiv, Arxiv don't I'm pretty sure).

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khufkens 11/27/2018 10:50 PM [in Public](#)

| *Machine readable information*

Again, in a free and open format. Everything is "machine readable", question remains if it makes sense if you do so.

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khufkens 11/27/2018 10:49 PM [in Public](#)

| *in standard interoperable format*

Meta-data should be in a free and open format. Interoperable format is a weak statement and leaves the door open for proprietary software.

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khufkens 11/27/2018 10:46 PM [in Public](#)

| *in machine readable format*

in an open / non-proprietary format

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khufkens 11/27/2018 10:42 PM [in Public](#)

This is the case for a lot of journals where you pay dearly for CC-BY. It should state explicitly that the copyright remains with the author or their institute (or better the original copyright holder).

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dmitri145 11/27/2018 10:08 PM [in Public](#)

*does not favour any specific business model*

Is "no-fee OA" considered a "business model"? If yes, could no-fee models be favoured over author-paid? The latter models carry major issues of inequality and diminished publication quality due to lack of competition from authors without funds, which seems to be a more profound difference than just a business model. Not favouring it may attract new models benefitting publishing profits rather than science and quality.

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khufkens 11/27/2018 9:52 PM [in Public](#)

*existing grants*

This is rather troubling as grants that cross the deadline would not yet have any budget for APC, while the requirement for OA does come with a cost. This assumes that partners will have their ducks in a row by the deadline (i.e. have a centralized system to defer these extra transition costs to).

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dmitri145 11/27/2018 9:20 PM [in Public](#)

*Author's Accepted Manuscript (AAM)*

Several problems due to divergence of AAM from published versions are documented in this comment and below: [https://gitlab.com/publishing-reform/discussion/issues/17#note\\_61434270](https://gitlab.com/publishing-reform/discussion/issues/17#note_61434270)

Notably: "It can also lead to wrong results proliferating needlessly, and people getting cited for their mistakes instead of their results."

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Mark\_C\_Wilson 11/27/2018 7:21 PM [in Public](#)

*must not have a mirror/sister subscription journal*

Clarify this. Also, grammar of sentence is wrong.

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Mark\_C\_Wilson 11/27/2018 7:15 PM [in Public](#)

*must be registered in the Directory of Open Access Journals (DOAJ)*

This rules out some very good free OA journals such as some members of Free Journal Network. The admin overhead of listing in DOAJ is substantial and they are not overly helpful or quick. At the very least, much more professionalism from DOAJ will be needed. Putting so much responsibility on them may backfire.

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Mark\_C\_Wilson 11/27/2018 7:13 PM [in Public](#)

Such a review must have substantial public input.

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Mark\_C\_Wilson 11/27/2018 7:12 PM [in Public](#)

Crowdsourcing may be useful here too.

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protohedgehog 11/27/2018 5:33 PM [in Public](#)

*APC waivers for authors from low-income countries and discounts for authors from middle-income countries.*

This dichotomy fails to appreciate the complexity of this situation. It should be revised to waivers/discounts to authors with demonstrable need for such things. This then accommodates for those who are perhaps independent or not well-funded in 'high income countries' too.

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protohedgehog 11/27/2018 5:30 PM [in Public](#)

*While all efforts should be made to also make this content as open and reusable as possible, more restrictive licenses on these aspects of content are acceptable if so required by the third party rights holder.*

This is unclear, and potentially undermines all of the purpose of CC BY without apparent justification.

---

protohedgehog 11/27/2018 5:23 PM [in Public](#)

| *The copyright of the work is left with the legal copyright holder (usually the author or their institution).*

This is unclear. The legal copyright holder is whoever copyright is with, dependent upon provenance and transfer.

As in, if a publisher demands copyright in exchange for publication, as is often the case, they become the legal copyright holder.

This needs to be clarified to indicate the original intention, in that full copyright cannot be transferred to a third party, such as a publisher.

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protohedgehog 11/27/2018 5:21 PM [in Public](#)

| *formal review process*

What and who will this comprise?

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protohedgehog 11/27/2018 5:14 PM [in Public](#)

| *establish incentives*

Does this mean financially, or otherwise?

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protohedgehog 11/27/2018 5:13 PM [in Public](#)

| *infrastructures*

This is a very broad term. Suggest co-ordinating with SCOSS over this <http://scoss.org/>

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protohedgehog 11/27/2018 5:07 PM [in Public](#)

| *independent study*

Please do not give this study to a commercial publisher to perform.

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protohedgehog 11/27/2018 5:06 PM [in Public](#)

| *establishing a fair and reasonable APC level, including equitable waiver policies, that reflects the costs involved in the quality assurance, editing, and publishing process and how that adds value to the publication.*

Again, this needs to be made clear to be absolutely based on the real costs of production. As well as the profit margins of some publishers.

For example, if we know that Elsevier charge ~\$2000 for an APC, but the cost of production at another publisher is \$100 for the same product, then the APC cap must be set at the lower bound. Anything else is a flagrant mis-use of funds. This is called fair competition, and also must be independent from things such as journal brand, which we know some publishers use to explicitly scale their APCs, which also contravenes the DORA principles.

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protohedgehog 11/27/2018 5:04 PM [in Public](#)

| *Where article processing charges (APCs) apply*

It needs to be explicitly noted that around 71% of the 11000 journals indexed in DOAJ do not charge APCs. <https://sustainingknowledgecommons.org/2018/02/06/doaj-apc-information-as-of-jan-31-2018/>

Thus, there are an incredible number of models that demonstrate that the APC-driven model is not needed at scale.

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protohedgehog 11/27/2018 5:02 PM [in Public](#)

| *cOAlition S calls for full transparency and monitoring of Open Access publication costs and fees.*

This is commendable, but needs to be clarified. For example, will it be just that APCs need to be made public?

Or that the actual costs of production, as some like Ubiquity Press and eLife, made public? If the latter, this would

actually have an impact on the market in a good way <http://fossilsandshit.com/the-term-article-processing-charge-is-misleading/>

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protohedgehog 11/27/2018 4:55 PM [in Public](#)

*The document is made available immediately open access (with no embargo) under a CC BY license.*

It needs to be absolutely clear that at the present, this is in conflict with the policies of virtually all large publishing houses. This could have one of two main effects, in that the journals must change their policies; or researchers will be unable to publish in those journals.

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protohedgehog 11/27/2018 4:53 PM [in Public](#)

*Open Access platforms*

Speaking of, what happened to the one proposed by the EC?

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protohedgehog 11/27/2018 4:52 PM [in Public](#)

Yes, me too. Seeing as this is a prominent part, I imagine examples of how this could look have been sketched out.

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protohedgehog 11/27/2018 4:52 PM [in Public](#)

Also major publishers such as PLOS, PeerJ, and F1000 Research. Also major OA journals from some of the larger traditional publishers, including Nature Communications and Scientific Reports from Springer Nature.

However, we do need to be aware of unnecessary additional charges for this, such as how the AAAS do with Science Advances (\$1000 extra for CC BY) <https://thewinnower.com/papers/73-aaas-misses-opportunity-to-advance-open-access>

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farleyas 11/27/2018 4:43 PM [in Public](#)

I imagined that this would be similar to publishers that deposit the final manuscript in PMC. "Request" seems like weak language as the publishers can just say "no we won't/don't do that". Although there is no reason they couldn't.

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farleyas 11/27/2018 4:38 PM [in Public](#)

*Plan S compliant repository*

I hope that this includes current repositories such as PubMed and not just new infrastructure

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protohedgehog 11/27/2018 4:38 PM [in Public](#)

Indeed. I mean, we've been in a 'transition period' now for around 5 years.

What I find strange is that this part seems to be reflecting on being cautious with publishers. As Tim Berners-Lee recently said, I don't think we need or should be asking for their permission, and I don't think this transition period is necessary. Evolve or die.

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farleyas 11/27/2018 4:37 PM [in Public](#)

*transformative agreements*

Would love to see an example

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protohedgehog 11/27/2018 4:37 PM [in Public](#)

It's very hard, and probably impossible, to retroactively undo a CC license. If a publisher tried to remove/block access to a CC BY article, they'd be legally liable, I think.

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farleyas 11/27/2018 4:35 PM [in Public](#)

*transition period,*

Would be great to see their thoughts of how long a transition period should be. I vote for 2 years.

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farleyas 11/27/2018 4:34 PM [🔗](#) in Public

| *CC BY Attribution 4.0 license*

Just want to highlight that the Gates foundation has been doing this since 2015 with no issues that I'm aware of

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farleyas 11/27/2018 4:33 PM [🔗](#) in Public

| *permanently accessible*

I wonder how this will be established/monitored

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protohedgehog 11/27/2018 4:20 PM [🔗](#) in Public

| *publishers facilitate deposit*

Interesting phrasing. Facilitate in what way? We know that many large publishers indeed make it as difficult as possible to 'facilitate' deposit, with variations based on funding, geography, licensing, article version, repository type. Does facilitate here mean do it for authors, or simplify this to create a single, simple protocol for deposition?

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protohedgehog 11/27/2018 4:17 PM [🔗](#) in Public

| *supports*

In what way does Plan S physically support this? For example, signing DORA and implementing DORA in practice are two very different things.

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protohedgehog 11/27/2018 4:14 PM [🔗](#) in Public

And over what time frame too?

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protohedgehog 11/27/2018 4:14 PM [🔗](#) in Public

| *new innovative publishing models*

Note that present market conditions actually prevent this from happening; something not addressed by Plan S explicitly. [https://zenodo.org/record/1472045#.W\\_1tL2j0lPY](https://zenodo.org/record/1472045#.W_1tL2j0lPY)

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protohedgehog 11/27/2018 4:13 PM [🔗](#) in Public

| *cOAlition S is committed to fulfil the specific target set out in Plan S – immediate Open Access to all scholarly publications from research funded by coalition members from 2020 onwards.*

Note that this is virtually indistinct from Horizon 2020, [http://ec.europa.eu/research/participants/docs/h2020-funding-guide/cross-cutting-issues/open-access-dissemination\\_en.htm](http://ec.europa.eu/research/participants/docs/h2020-funding-guide/cross-cutting-issues/open-access-dissemination_en.htm) which originated in 2014.

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boer0107 11/27/2018 3:01 PM [🔗](#) in Public

| *intend*

why is signing DORA only an intention

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camilla\_lindelov 11/27/2018 10:35 AM [🔗](#) in Public

| *not accept the non-commercial (CC BY-NC) variant*

In DOAJ, about 500 k articles with CC-by NC, and another 500 k CC-by NC ND, and abt 250 k CC-by NC SA

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**Anonymized comments by editors in a thread “Impact of Plan S on FJN” in Free Journal Network online forum, late 2018-early 2019.**

(Editor 1)

As an example of the thousands of DIY journals run by non-techy people. I edit the Journal of Political Ecology with no budget - it took us years with the help of the Arizona library system even to convert the site with 250+ articles to an old version of OJS. I have never heard of XML and I certainly could not convert files retrospectively - we will use just PDF as long as we possibly can - even though I know people like scrolling text on phones these days. I think the CLOCKSS costs money, doesn't it? 'Metadata' I think we have via OJS, but I don't put the reference lists in the metadata boxes of OJS because it ruins the presentation of the articles - the abstract is followed by a long list, unlike on most journals and I have not found a way to conceal the reference list.

In other words, we are screwed if the Plan S insists on all of these things - I actually can't see a way forward. More power to the big companies that have staff to assure compliance.

It feels like the 'radical alternative' proposed by FJN has, with the Plan S proposal, become more mainstream - but many journals are actually going to be left out of it.

(Editor 2)

Yes, I believe CLOCKSS costs nontrivial money. With zero budget for TAG, I'm hoping that perhaps my library/publisher will spring for it on their own.

(Editor 3)

It is going to be a serious issue if Plan S actually marginalizes DIY publishing.

(Editor 4)

It would be great if both Plan S and DOAJ would recognise deposition of the final published versions of papers on the arxiv as a valid option for archiving. Is there some way in which we can push for that?

(Editor 5)

... if FJN can make a representation to the effect that added regulation complicates and burdens Journals that are trying to go way beyond Plan S (by removing the publishing cost altogether) then that would make sense.

(Editor 2)

The archiving and XML seem to be the biggest issues that

will haunt our smaller unfunded journals (and perhaps bigger ones as well). I'll be checking with my publisher to see if they can implement both within the several journals that we host at the same time... and hopefully at a reduced cost. I'm quite sure I'm not the only journal in the group facing this same challenge.

(Editor 6)

Let me ask: Which of your journals actually use Scholastica, or any other non-OJS software? Scholastica's pricing scheme seems to me unaffordable for platinum journals that don't have several thousand dollars annually as an institutionally guaranteed budget. Is there some other way that I overlooked?

(Editor 7)

Quantum is using Scholastica (although only for the peer-review process, we do publishing with our own software) and as we have sufficient authors who are paying the voluntary APC it is quite affordable. Satisfying the Plan S requirements will however be a great challenge for us. Providing full text XML and collecting and serving funder information is technically difficult.