

Feedback to Coalition S on Plan S Implementation Guidelines

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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 Frantsvag <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_m6NPJIEis9kPE_iB0wA)
- Comments from editors of journals belonging to Free Journal Network