

Response by EuroScience to consultation on Plan S (DRAFT)

Executive Summary

EuroScience is a long-standing supporter of Open Access policies and has strongly endorsed the principles of the recently proposed Plan S. EuroScience believes that the implementation of Plan S, to be effective, must take into account the needs and expectations of researchers across all fields and sectors. With this in mind, EuroScience, as the leading pan-European interdisciplinary grassroots organisation of researchers and science professionals, has organised a consultation of its members in order to identify those aspects of implementation that require clarification, together with suggestions for other points that need to be examined.

The EuroScience consultation has generated feedback on several important issues :

Speed: *implementing Plan S at the speed proposed is doubtful. Costs of the measures to be put into place are not yet available, and without significant confirmed global participation, European researchers might suffer. Most journals in the world do not yet comply with Plan S, and impacts are not clear, for example, for the publishing industry that contributes to the European economy and learned societies that use income from journals to support their scientific communities.*

Diversity: *well-prepared consultations are needed with a variety of research communities as implementation scenarios are likely to differ significantly from one field to another. Furthermore, joint funding of compliant and non-compliant funders, or joint articles from authors benefiting from different APC rates, require pragmatic solutions. Quality validation of all Open Access journals is needed as well in order to avoid perverse incentives to publish too many articles.*

Cost: *the study into publication costs and prices proposed by Coalition S is welcome and must also look at how to achieve an overall reduction of costs for institutions and funders. International collaboration between institutions with a larger proportion of grant-based financing and other institutions with more substantial recurrent funding, makes it imperative to know how each will fare under an APC-based system. There should be no barriers for any researcher to publish, but the idea of waivers and reduced charges raises issues such as who is eligible and may require an explicit mechanism to ensure that the costs of publishing will be paid without a reduction in the variety of journals and their quality. A specific mechanism for individual researchers might be required as well.*

Evaluation of researchers: *the impact of changing publication models on the evaluation of early-stage researchers in their career development, or in keeping Europe attractive for early-stage researchers from non-European countries, should not be underestimated and requires parallel action. Simultaneously, thought needs to be given to disconnecting the peer review system from publishing and to examining the possibility of paying journal reviewers.*

Data management: *requiring immediate Open Access must go hand in hand with requiring fair sharing of data, ownership of data and publication rights, especially when partners from low and middle income countries are involved. Copyrights should remain with authors or institutions, and consideration should be given to variations from one national system to another. The default licence should be CC BY, but CC BY-ND should not to be prohibited. Access to data and to pre-2020 publications should also be part of the discussions.*

Other actions: *working on implementing Plan S should not be the only course of action. Making it mandatory to deposit articles in certified repositories and creating a Joint European Publishing*

Platform, with funding for curation and long-term stability, are other ways to move forward in the same direction. Significant progress is also possible when universities, research institutes and organisations jointly negotiate with publishers, as examples in the Netherlands, and very recently in Germany, have shown.

Introduction

EuroScience has always supported Open Access as an important factor in the development of research both in Europe and worldwide.

Results from publicly funded research should be accessible for other researchers and other interested parties as widely and early as possible. They should also be available for distribution, re-use, recombination or mining unless there are good reasons to put restrictions on this.

Therefore, EuroScience endorses the principles of Plan S.

However, the implementation is not straightforward. Thus, EuroScience welcomes the guidelines for implementation written by the cOAlition S and is pleased to contribute to its consultation.

EuroScience has invited its members to respond to the two questions raised and mention any other issues they think are important. Below are the main points brought up by our members. The Governing Board has validated this response.

1. Issues that need clarification

While Plan S should not be unreasonably delayed, from the many reactions received it is clear that most doubt that it is possible to implement Plan S at the speed proposed.

1. There is too little clarity on the costs.
2. While there are positive signs about support from e.g. China and the Bill and Melinda Gates Foundation it is unclear whether, without significant confirmed global participation in cOAlition S, the current partners can enforce the transition towards Open Access as planned without damage to European researchers.
3. The fact that most journals are not yet complying with is an impediment that can hardly be overcome within a year without consequences for researchers.
4. There is not enough insight in the impacts of Plan S in various dimensions. As the cOAlition S mentions, differences in publication practices between various fields of research are huge. This will require much more consultation with these communities. It is good that a delay is already accepted for some areas, e.g. the humanities, but there are more differences than just between the humanities and the rest of science.

It was already mentioned that broader global support is needed. The major research funding agencies must be on board as well as private trusts and foundations. The Bill and Melinda Gates Foundation and the Riksbankens Jubileumsfonds are welcome first supporters but a credible action without confusion among researchers requires more partners from this category.

EuroScience proposes that cOAlition S organises consultations with a variety of research communities in Europe. They need to be solidly prepared with information on publication practices, on cost and price issues involved, on provisional estimates of impacts and on a number of various implementation scenarios.

One of the impacts that need careful attention is what Plan S means for the publishing industry. On the one hand there are major European commercial publishing houses that rightly deserve criticism when they are not committing to wide and immediate accessibility at reasonable costs. However, they contribute significantly to the European economy. In addition, and most importantly, there are many learned societies that publish journals commercially and from this income support many useful activities to support the cohesion of the scientific community (symposia, fellowships, travel grants etc) that cannot be ignored.

We very much welcome the independent study cOAlition S has announced into publication costs and pricing issues. That study needs to take into account a large number of issues. These include:

- The new publishing system has to result in a considerable reduction of the overall costs for institutions and funders (whether national funding agencies, international funders such as the EU or trusts or foundations). How to set and enforce caps is not going to be easy.
- Full costs of publishing have to be considered, which includes not only costs of long-term preservation in repositories but also the so far neglected costs of the peer review system.
- What are the costs of hybrid journals where some authors pay Article Processing Charges (APC) to have their articles immediately accessible for everyone and free of charge, and others do not so that the journal still charges for subscriptions? It looks like the worst and most non-transparent of all possible worlds.
- Is it possible to estimate or simulate cost differences between institutions where much research is financed from grants from funders and others which have much larger relative institutional funding? The rapidly increasing tendency to international collaborations across the globe make this an important issue to be addressed.
- EuroScience fully supports that there should be no barrier for any researcher, whether (s)he is from a developing or poorer country or institution, or an independent researcher or otherwise not in a position to pay for (substantial) APCs, to publish in quality journals. Therefore, EuroScience supports the idea of waivers and reduced APCs. But it will be very hard to set levels for reduced APCs and to determine who would be eligible for waivers or reduced APCs. In addition, as publishing scientific output implies costs whether it is done by a commercial or not-for-profit organization, who is going to pay for these costs? The current system implicitly covers this, but there seems to be a need for an explicit mechanism if one transits to a system based largely on APCs.
- EuroScience is of the opinion that in an APC-based system funders and institutions should pay for the costs of publication. That leaves the question as to what to do with individual researchers who don't face costs for publishing their results. Here, just as in the case of waivers and reduced APCs, there is a need for a common solution to be developed.

Apart from financial issues, there are other implementation issues relating to eventually moving to APCs that need thorough investigation.

- What happens when a Plan S-compliant funder and a non-compliant funder together fund a research project?
- How to cope with a situation of co-authors enjoying different APC rates? It points again to the need for an explicit mechanism to fund the costs of waivers and reduced APCs.
- How to avoid perverse incentives, for example when publishers want to accept larger numbers of papers than a solid peer review would let pass?
- Validation of all open access journals is important so that one can remove the 'scourge/plague' of predatory journals.

It is obvious that the current peer review system is under pressure. That will not change under an APC-based publishing model. The pressure to disconnect peer review from the activity of publishing

might even increase. Shouldn't one start to redress one of the underlying key problems of the current system: un-paid reviewers?

Early career researchers are especially dependent on the current system of publishing. Their reputation and chances of promotion are almost completely determined by publishing substantial numbers of articles in journals with a high impact factor. Transiting to a new APC-based publishing system will require the complete rethinking of the evaluation of individual researchers and the conditions for moving forward in research careers, especially for those institutions operating a 'tenure-track' system. Both for funders and research performing organisations this is a challenge they must meet in parallel to changing the publication models. Evaluation for example needs to take into account next to publications all the considerable work necessary to enable useful sharing of publications and data, such as documenting usable metadata and making the data FAIR (Findable, Accessible, Interoperable, Re-usable). This will require time and pilots. Some international groups are working on this such as the Research Data Alliance (RDA) and specifically the RDA interest group SHARC (SHaring Reward and Credit).

There is another aspect relating to early career researchers that needs to be taken into account and underscores the need for global coalitions. A Europe with a different publishing system than, for example, the USA or Asia may become less attractive for early career researchers from those regions.

EuroScience agrees that copyrights should remain with authors, or if institutional arrangements so require, with institutions. The default license should indeed be the Creative Commons Attribution Licence (CC BY), and allow for commercial use. However, CC BY-ND (No Derivs) licences should not be prohibited if there is a danger that the original version of a publication or other research result may be modified. Copyright law, for that matter, can stand in the way of Open Access publication. In the humanities, for example, it is important to be able to use reproductions of art or pictures. We also want to draw attention to a related issue which is important for an equitable international science endeavour, namely ownership. There is currently no requirement for institutions to deal fairly with ownership of publications. Specifically where partners are from low and middle income countries, the requirement for immediate open access without requirement for fair sharing of data, ownership of data, publication rights is problematic. The Research Fairness Initiative (RFI) is a reporting system that creates transparency in how research partnerships are constructed and managed, and how benefits, including authorship and publication rights, are fairly distributed among partners. EuroScience wants to encourage its use by all institutions that are project and partnership leaders, in the interest of fairness and international science relations (<http://rfi.cohred.org>). The Montreal Statement on Research Integrity in Cross-Boundary Research Collaborations points in similar directions (<https://wcrif.org/guidance/montreal-statement>).

Two additional points need further reflection. One should not forget the importance of providing open access to the data underlying publications. Firstly, we refer to the response of European Council of Doctoral Candidates & Early Researchers (Eurodoc), the Marie Curie Alumni Association (MCAA) and the Young Academy of Europe (YAE) for several good suggestions. Secondly, current researchers and other users have a key interest in access to publications from before 2020 or any moment that Plan S might be implemented. There should be arrangements to address these issues as well.

2. Other options to take into consideration

Working on implementing Plan S should not be the only course of action. Regional and national perspectives vary and may well not lead to a uniform solution to increasing Open Access publishing.

There are useful approaches working in the same direction. Funders could make it mandatory to deposit pre-prints in certified repositories, with the additional requirement that as soon as these are available Author Accepted Manuscripts (AAMs) should be the version posted on these repositories. The EC and the coalition of funders could set up a European Publishing Platform based on trust, with excellent researchers as Editors, with administrative support funded by funders; basically this would have the characteristics of, for example, the American Chemical Society (ACS) but without the financial model of ACS. This would mean the EC and funders assuring that all research outputs are openly accessible while providing funds for the platform, its curation and long-term stability. Significant progress is possible when “customers” (universities and research institutes and organisations) team up and jointly enter into negotiations with publishers. The Dutch model is an example where the Association of Dutch Universities (VSNU) has deals with publishers, in the name of all universities and university libraries (https://www.vsnu.nl/en_GB/press.html and <https://www.the-scientist.com/news-analysis/dutch-universities-journal-publishers-agree-on-open-access-deals-30860>). An interesting side comment is that these deals lead to an approximate effective APC of approximately 200€ per article, much below the current estimates for the APC cap in Plan S. Another example is the very recent deal that the German universities and research institutes and organisations (teaming up in Projekt DEAL - <https://www.projekt-deal.de/about-deal/>) have concluded with Wiley that has agreed a Publish&Read Deal that covers both access to the literature and Open Access publication of papers submitted by corresponding authors from participating institutions. We look forward to the disclosure of the details of this contract in the next weeks. The negotiation of such contracts between other publishing houses and other consortia of institutions from other countries would greatly facilitate the participation of researchers in open access publication.

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