

## British Library response to Plan S implementation guidance

The British Library strongly supports the members of cOAlition S and their ambition for full and immediate Open Access to publications from publicly funded research. Such an ambition aligns with our own mission to make our intellectual heritage accessible to everyone, for research, inspiration and enjoyment. Our own [Open Access policy](#) states that the British Library believes that the wider accessibility of publicly-funded research, combined with flexible reuse conditions, will raise the social, economic and cultural impact of UK research. While we support the intention of Plan S, we have concerns around some areas of the implementation guidance and so we offer our feedback below.

### Monographs and book chapters

We are concerned about the level of uncertainty that a delay in issuing guidance on Open Access monographs and book chapters brings to the Arts and Humanities community. While we acknowledge that the transition to Open Access monographs is at a very different stage compared to scholarly articles, the release of a timetable for initial guidance would help guide expectations.

### Plan S compliance – green Open Access

We support the green route to Open Access and believe it can play an important role in the success of Plan S. The HEFCE Open Access policy in the United Kingdom has ensured that the green route has become more widely accepted in the scholarly community. The success of this policy is evidenced by the high rate of Open Access in the UK reported in [Monitoring the transition to Open Access in December 2017](#). Key issues around Green Open Access, specifically the long embargo periods and lack of reuse rights, would be addressed by Plan S requirements.

Plan S guidance currently states that scholarly content must be deposited in the repository “at time of publication”. We believe that a language change to “no later than time of publication” would acknowledge that currently some publishers, for example Cambridge University Press and SAGE, permit deposit upon acceptance, and that these policies should be encouraged rather than ignored.

An additional concern around the green route, comes in the requirement for publishers to have their journal self-archiving policies in Sherpa Romeo. While we acknowledge that Sherpa Romeo is an invaluable tool to the repository community, this requirement is likely to disadvantage non-English language journals (and some small English language publishers) which may be unaware of the service. Plan S must certainly promote the Sherpa Romeo service, however, encouraging authors and repository staff to request that the publisher send their data to Sherpa Romeo is a better approach than labelling the journals non-compliant. After a period of outreach, this approach could be evaluated in the next review period.

Another area which will likely undermine the success of green Open Access is the Plan S requirements for repositories. Institutional repositories have been a vital component in the transition to Open Access and it is important that Plan S strengthens their role rather than laying out requirements that they do not currently have the resource to fulfil. While some repositories have been working with Jisc to ingest manuscripts through the [Publication Router](#), this work has focused on specific repository software and so many repositories in the UK have not yet been included in this project. The guidance has other technical requirements (such as open APIs, XML in JATS, and QA processes) which are all likely to increase costs and thus create a barrier to entry. We believe that

changing the requirements for repositories in 10.2 to recommendations will allow institutional repositories to continue to play a key role in the Open Access movement.

### Open Access and publication costs

While the green route to Open Access has been quite successful in the UK, an expansion of gold Open Access brings much complexity around costs and funding. The diversity of the scholarly communication ecosystem means that a one-size fits all approach is unlikely to work. This applies to publishers, research institutions and researchers. Here we have outlined some potential problems likely to arise from implementing the guidelines:

- The as yet undefined APC cap is already creating much uncertainty for those who will be affected by Plan S. While a cap may certainly force some journals to lower their APC, a cap can often encourage price increases on the other end of the spectrum, a race to the top. Transparency around publishing costs may limit this to some extent, but we fear that there is room to misrepresent costs to permit prices at the top of the APC cap. We are certainly concerned that publishers with a diverse disciplinary portfolio may increase the APCs in Arts, Humanities and Social Science (AHSS) journals in order to balance any losses caused by the publisher's need to reduce the APCs of profitable Science, Technology, Engineering and Medicine (STEM) journals. AHSS researchers often lack the funds to pay even relatively low APCs, so these disciplines could be disadvantaged further. Also, teaching universities and specialist research institutions in the AHSS field would be particularly affected.
- While a price cap for APCs is in the guidance, the issue around costs for reproduction rights is absent. How can cOAlition S ensure that scholars are not subject to unaffordable price rises for reproduction rights of third party copyrighted works? For many organisations, the complexity that Open Access poses for pricing reproduction rights is yet to be unravelled and with the potential for unlimited downloads (and in some cases print-on-demand), some organisations may lean towards higher prices. This is a reality that cOAlition S needs to acknowledge and ensure is monitored and incorporated into review processes.
- Arts, Humanities and Social Science scholars typically receive less funding than those in STEM subjects and as such have not been able to pursue Gold Open Access to the same degree as STEM. This is certainly something that has affected the British Library and other [AHRC funded Independent Research Organisations](#) who have not received funding for Open Access through the RCUK block grant. If there is a shortage of quality APC-free Open Access journals, and Arts, Humanities and Social Science scholars continue to suffer from their same current lack of funding for Open Access, then there will be two potential outcomes. Those at institutions that have signed up to transformative agreements will be pushed towards pursuing gold Open Access with these publishers (who are likely to be larger publishers). This will result in distorting the market against fully Open Access journals that operate on an APC model, therefore disadvantaging publishers that have been trying to be a positive force in the transition to Open Access. For those at institutions without transformative agreements, pursuing gold Open Access would not be financially possible.
- Open Access is certainly more embedded in the STEM scholarly community and the relative lack of quality Open Access publishing options in the Arts, Humanities and Social Sciences is causing concern for some scholars in those communities. We are pleased to see that cOAlition S have commissioned a gap analysis of Open Access journals/platforms to identify

fields and disciplines where there is a need to increase the share of Open Access journals/platforms. While the gap analysis will provide important evidence and enlighten the community about next steps, it may take years for these gaps to be filled. For this reason it is important to acknowledge the value green Open Access will continue to have for many scholarly communities.

## Data

Plan S requires that links from articles are provided to underlying data and code. As linking is not seen as good practice, we ask that Plan S raise their requirements in this instance. Data, code, and any other output that the research fundamentally relies on, must be cited properly, which also includes the need to provide a persistent identifier. Citation allows creators to be given appropriate credit, and enables reproducibility of the work.

## Final remarks

The British Library would like to reiterate their full support for Open Access to publicly funded research and are very pleased to see that this is being approached as a collaborative effort of many major funders in Europe. Alignment of Open Access policies should certainly strengthen the movement, and we hope to see more countries join cOAlition S in the future. If cOAlition S does not expand to become a truly global movement, it may be difficult to have truly transformative agreements as the impetus for publishers to flip will be limited.

The British Library is supportive of many components of Plan S guidance, particularly the Creative Commons Attribution licence, the San Francisco Declaration on Research Assessment, open citations, the move to innovative publishing models, preprint availability, and transparent publishing costs. However, although we want to see more Open Access to research, we do think more thought needs to be given to how this can be achieved. The scale of the transition is enormous and affects not only publishers, funders, research institutions and scholars, but also discovery services, preservation providers, persistent identifier organisations and many other vital components of the scholarly communications ecosystem. Collaboration between the funders of cOAlition is a good start, but they must also look to stimulate further collaborations across the entire ecosystem to ensure that everyone can move forward together, and no scholarly community is left behind.