

Guidance on the Implementation of Plan S

● Response to the call for feedback by the Royal Geographical Society (with IBG)

The RGS-IBG is the UK's learned society and professional body for geography. We advance geography and support geographers in the UK and across the world. The RGS-IBG supports the dissemination of geographical knowledge through our scholarly publishing portfolio, which includes four hybrid journals, a fully OA journal, and a book series. We have consulted widely with the geographical community in developing this response; their concerns are reflected in the comments presented here.

The Royal Geographical Society (with IBG) (RGS-IBG) welcomes the opportunity to provide feedback on cOAlition S's guidelines for the implementation of Plan S. The overall aim of Plan S, to make publicly funded research openly available, is commendable. The RGS-IBG welcomes proposals that facilitate a fair and transparent system of knowledge production, and scholarly communication that enables researchers to reach the widest possible audience. We support movement towards open access and open science research ecosystems that create a more inclusive system of knowledge production. However, implementation of the principles of open access must be balanced with principles of academic excellence, autonomy, and freedom.

We do have concerns about some of the possible unintended consequences of Plan S for publishing in geography, particularly for parts of the discipline that are more closely aligned with humanities and social science and for researchers who may not have access to APCs. We remain convinced that hybrid journals, green open access, and embargoes are important parts of a healthy publishing ecosystem, and can be complementary to extending OA.

We support the position of both the British Academy and Academy of Social Sciences in urging cOAlition S to engage more widely with a broader range of stakeholders to consider more fully systemic effects of Plan S, looking at their distributional effects (by career stage, institutional context and geographical setting), and to consider the uneven impact on disciplines, including geography.

Availability of established high-quality Plan S compliant fully OA outlets in geography

There is relatively low OA take-up in substantial parts of the discipline of geography, which is due in part to a historic lack of funding for APCs, and there are few established high-quality fully OA publication outlets available to researchers in geography that would be compliant under the Plan S guidelines.

Although cOAlition S indicates that it intends to 'support mechanisms for establishing Open Access journals, and infrastructures', there is a lack of clarity about what this means in practice and it is not clear that a sufficient number of new high-quality and sustainable platforms and/or journals can be made ready before 1 January 2020.

From our own experience of launching a high-quality fully OA journal (*Geo: Geography and Environment*), we know that it takes time, and significant work, in order for a new journal to obtain profile and visibility within a discipline, particularly in areas where available funds to support OA publishing and existing levels of engagement with OA are low.

Retaining plurality in the scholarly publishing ecosystem: hybrid journals

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We urge cOAlition S to recognise the continued role for hybrid journals and green open access publishing, with appropriate embargos. The unintended consequences of removing hybrid journals from the publishing landscape needs to be given full and careful consideration. Many of these journals have international reach, publishing authors from across the world and are read widely by international audiences.

There is a further risk that the proposals offered by cOAlition S will simultaneously undermine the plurality of high-quality publication options available to researchers and unintentionally facilitate the emergence of monopolistic platforms, and thereby enable and concentrate further commercial practices in scholarly communication.

Plan S lacks detail regarding how the cOAlition S guidelines will be operationalised on a global scale and how Plan S will impact on articles emanating from international research collaborations, particularly between EU and non-EU research partners. Publicly funded UK geographers will not be able to publish in non-compliant international journals and it is likely that a majority of researchers outside of Europe will not have access to funds for APCs. There is a risk that Plan S could unintentionally promote greater insularity over international knowledge production and exchange and exclude key international voices. Plan S could, therefore, result in existing hybrid journals potentially needing to make difficult choices between compliance with Plan S and being accessible to researchers who do not have access to funds for APCs.

The requirement for scholarly articles to use the most permissive of the Creative Commons Attribution (CC BY 4.0) license, which allows for reuse and adaptation in all contexts provided that the original author is acknowledged, will not be appropriate for all researchers in the discipline of geography. CC BY is particularly problematic in situations where the main contribution of the paper resides in the quality of the presented argument; CC BY fails to adequately mitigate risks of changes to the text (these do not need to be documented) and inaccurate translation. Experience suggests that the process for obtaining third-party rights can also be more time-consuming and expensive for researchers when the article is to be published under a CC BY license. We recommend strongly that CC BY ND should be reconsidered, and that the decision on the license sit with the researcher/author who is best placed to make a decision about the most suitable license for their publications. This could exacerbate the research gap between the Global North and Global South.

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