Guidance on the Implementation of Plan S

Royal Geographical Society

with IBG

Advancing geography and geographical learning

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

We are unconvinced by the assumption made in Plan S that hybrid publishing models are incompatible with open access publishing. We cannot accept that moves to abolish hybrid journals will necessarily enhance the dissemination of scientific research, especially in a discipline like geography where the majority of articles are not directly funded by the signatories of Plan S. In this context, maintaining a plurality of options is vital and hybrid journals are important vehicles for extending OA into areas of disciplines or with authors where

Although hybrid journals create well-documented barriers to immediate access for readers, the gold (APC) model introduces different patterns of inequalities that will impact on where researchers are able to publish, and in what volume. This is a particular concern for those who may not have access to APC funding (e.g., ECRs, those on-or-between short-term employment contracts, non-affiliated researchers, and those employed at institutions with fewer resources) and might, therefore, be excluded from publication in Plan S compliant journals which are highly visible in their field. This could have a detrimental impact on career progression and access to certain types of research. It is essential that researchers are able to publish in outlets they deem to be the most appropriate. Efforts that ultimately prevent researchers from publishing in the journals that they believe to be most appropriate sit uncomfortably with accepted notions of academic freedom.

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.

In the UK, there will also be important questions for Higher Education Institutions to consider when administering APC funding if 'publicly funded' research is to include those in receipt of Quality-Related funding. These processes will influence how, where, and how often their researchers can publish in compliant outlets. It is also unclear whether APC funding will be available for the full of range research outputs, beyond the peer-reviewed research article, which are commonly found in hybrid titles and are important to scholarly communication such as editorials, letters to the editor, review articles, commentaries, and book reviews.

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.

Licensing and rights

take-up is low.

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.

Quality and the cost of publishing

We welcome Plan S's attention to fair pricing and the transparent communication of publishing costs, although it is unclear what this will mean in practice. It is important to emphasise that high-quality publications (particularly for selective journals) are not cost free. The services provided by publishers and societies to support enable high-quality publishing (support for responsible peer review, high-quality production, dissemination, waivers, archiving etc.) and the wider scholarly publications infrastructure are important and are not cost free. These costs do not disappear with shifts towards digital publishing.

We would also like to highlight that learned societies, including the RGS-IBG, reinvest income generated from their publishing operations in the wider research environment and disciplinary ecosystem to support the communities they exist to represent. Although the impact of Plan S on learned societies will be variable, the proposals present a challenge to the financial sustainability of smaller societies and one unintended consequence is that societies may become more dependent on commercial publishers to deliver their publishing services. We recognise that there is active thinking on this issue, as indicted by the proposed ALPSP, Wellcome and UKRI joint initiative that focuses on the potential strategies and business models which societies could adopt under Plan S. However, the process for this work and its intended outcomes are unclear and will come too late to support societies in building new effective business plans before Plan S takes effect. We urge attention to be focused on this now.

Books and monograph chapters

We welcome recognition that the timeline for achieving Open Access for books and monograph chapters will extend beyond 1 Jan 2020 and emphasise that a wide consultation will be required in order to develop proposals that are workable across different disciplinary spaces.

Timeline for implementation

We conclude by highlighting that the proposed timeline for implementation poses considerable challenge. It is difficult to envisage that new business plans and models, which provide high-quality publishing options for all researchers, will be developed and implemented before 1 Jan 2020. We remain committed to open science and publishing, more inclusive knowledge production practices, and wider dissemination of geographical research. Yet we are concerned that the proposals as currently formed will lead to a less plural publishing ecosystem and a new landscape of inequalities that will disproportionately affect ECRs and those who lack access to funds for APCs.