

## UEA feedback on Plan S

The overall aim of improving access to and reuse of research outputs is supported.

However we do have requests for clarification that we have aligned to three main areas: timescale, costs and scope. We have some further comments on other areas that we believe need further consideration, on wider aspects of Plan S.

### Timescale:

We believe that the deadline set of 1 January 2020 is unrealistic as there is still too much uncertainty in how the Plan can be implemented in practice, especially as some funders are currently consulting on the plan and have not yet all finalised their policies.

- While the plan is at this consultation stage, whilst we are happy to share the principles, it is not yet appropriate to communicate all the specific requirements to researchers, as this has potential to create significant confusion if any of the requirements change or differ between funders.
- Researchers may have already submitted papers which will not be published until after 01/01/2020. We suggest that the timescale is extended so that the number of papers submitted before the requirements are clarified, and relevant funders have confirmed their policies, is minimised.

### Costs:

- The lack of compliant green open access platforms that are likely to be able to meet the requirements of plan S puts additional pressure on clearly identifying what funding is available, and further clarity is required on who is responsible for covering open access costs. The guidance says “cOAlition S members will ensure financial support for OA publishing via the prescribed routes to compliance” but does not guarantee covering the full costs.
  - This is especially pertinent given that Plan S imposes a cap, which has not yet been specified. Who decides whether or not an institution has sufficient means to cover open access costs?
- Cost implications of Plan S are further complicated by open access and subscription access to journals and other publications being bundled together for negotiation between publishers and institutions/consortia. In particular, the negotiations do not just cover current publications but access rights to the archives, especially archives of c.20 years online publications. Such agreements will only be fully transformative if they address not just access to current and future publications, but also access to the archive. If that is not addressed, this has the potential to hinder dramatically research in all disciplines, but the humanities and social sciences disproportionately as they are more heavily reliant on that past 20 years of materials. Plan S is silent about that material and its value to researchers.

### Scope:

- What type of publications exactly are in scope and on what timescales? While the overall plan refers to all types of outputs (while noting difficulties with monographs and books), the guidance refers to scholarly articles. There is a particular grey area around the position for conference proceedings.

- How to identify Plan S compliant journals/platforms? Whose responsibility is it to identify these? (Currently the guidance says that” cOAlition S intends to work with the Directory of Open Access Journals (DOAJ) and the Directory of Open Access Repositories (OpenDOAR) to establish mechanisms for identifying and signalling whether journals/platforms and repositories, respectively, are in compliance with the cOAlition S requirements.”) The date for implementing Plan S should not be before these mechanisms are in place.
  - Are there currently any fully Plan S-compliant journals (e.g. providing transparent costing information)? Highlighting any such platforms as exemplars would be advantageous to all concerned as it will help clarify just what is being expected.
- Who decides whether “high quality Open Access journals or platforms” exist? How will this be communicated? How will it feed into the monitoring of compliance? What should a researcher do if they believe that they are not served by a suitable platform?
- How will journals covered by a transformative agreement be identified as so often these agreements are done by publisher rather than individual journal *per se*?
  - **Repository and self-archiving requirements**
    - We are broadly in agreement with COAR’s feedback on Plan S and the implication for repositories.
    - In addition, clarification is required on what is meant as an “Automated manuscript ingest facility” for repositories. We believe that the requirement “Full text stored in XML in JATS standard (or equivalent)” will not be technically possible within the required timetable. It would be wiser to work with existing repository software providers to agree a roadmap for functionality to be developed to meet these requirements, rather than basing the burden on each individual institution.
    - We know of very few publishers that allow self-archiving under the specified terms, with the exception of the Royal Society (and it is then not clear if they meet the requirements for a Plan S compliant journal, which is also necessary for full compliance). This would pose a massive limitation on the number of publishing venues available to authors across all disciplines.
  - **Funder policies**
    - We note that although individual funders have signed up to Plan S, they appear to be maintaining separate policies on open access. Multiple policies create confusion and uncertainty, and will also complicate the process of universities, research organisations and libraries to align their policies – to which policies should they align? In the UK there is further complication over whether UKRI’s association with Plan S will affect the funding councils and the REF, which currently have separate open access policies.
  - **Hybrid journals**
    - The ban on hybrid journals makes sense in terms of requiring publishers to move away from such expensive models and potential ‘double-dipping’.
    - However in practice, we note that the ban on hybrid journals is likely to cause confusion among researchers, and that this confusion is exacerbated by the

exemption for hybrid journals covered by a transformational deal, which has the potential to create further confusion among administrators.

### Further comments

- We also believe that the implementation of Plan S has the potential to have a negative impact on some researchers:
  - Early career researchers. While they may benefit from their outputs being openly accessible, the reality is that many institutions will look at publication venue when shortlisting/selecting candidates for position, while **plan S only applies to certain funders in some countries**. In such cases, the restriction on where they can publish is likely to have a negative effect on career opportunities and this will disproportionately affect early career researchers.
  - Similarly, Plan S will disproportionately affect researchers in areas and disciplines which are not currently covered by a suitable open access platform.
  - Researchers collaborating with researchers who do not receive cOAlition S funding may experience conflict in where to publish, if an 'in scope' and 'highly regarded' journal in the discipline does not comply with plan S.

### Conclusion

- We note further that the success of Plan S largely depends on two factors:
  - o Publication venue becoming of no importance to appointment and promotion boards. Despite the growing number of DORA signatories, this is a culture change that is unlikely to happen in the short term because we are in a global academic and publishing context.
  - o Publishers changing their terms and practices. The experience in the UK around the Finch report, and negotiations with publishers and libraries globally, demonstrate that this is far from straightforward and will take place far more slowly than Plan S asserts

Neither of these factors is in the direct control of an individual researcher, who may feel adverse effects from complying with Plan S. This should be acknowledged and more steps should be taken to minimise such effects. There is otherwise a danger that, even if Plan S is successful, and publishers and institutions comply, academic practice will not have changed.