

## University of Oxford response to cOAlition S on Plan S guidelines

The University of Oxford is a leading research-intensive institution with a mission for ‘the advancement of learning by teaching and research and its dissemination by every means’. The University supports and promotes wide access to, and dissemination of, its research outputs as described in its Strategic Plan 2018-23 and its OA Publications Policy. The University and Oxford University Press support the broad OA objectives of Plan-S and the transition to OA publishing. However, following consultation across the collegiate University, we have significant concerns relating to the Plan S guidelines and their implementation. These are summarised below followed by more detailed comments.

### SUMMARY

**Freedom of choice.** Our researchers strive to publish their research in the world’s best publications, and rely on freedom of choice over where to publish. Freedom will be curtailed under Plan S since many publications of first choice (for example US-based hybrid publications) will not meet Plan S requirements for the foreseeable future. Curtailed choice will be particularly disadvantageous to early career researchers seeking to build reputation and career. While we understand that funders of research may have concerns over some publishing aspects, we prioritise the ability to attract, retain and progress the best researchers from around the world by ensuring they can research in an environment that allows them to determine the best method and place for publishing their work. We believe that ultimately this approach also provides the most impactful outcomes for funders.

**Implementation.** The guidelines make no allowance for the speed of publishing in different disciplines: those publications that wish to transition to full OA in physical and medical sciences may do so relatively quickly whereas humanities has a longer publishing cycle – these differences should be recognized and allowed. We are concerned that funders will interpret the guidelines differently, leading to a stack of different Plan S policies that are impractical and confusing to operate. Plan S will place inequitable and likely inoperable constraints on co-authors in international collaborations with other co-authors funded without Plan S obligations. Requirements that divide or disadvantage participation in collaborative research must be avoided, or exemptions provided.

**Funding and sustainable publishing.** The goal of widespread gold OA is likely to be unaffordable even with capped APCs. It is unlikely that there are sufficient funds amongst UK funders to meet the APCs required for gold OA (even when capped) given the volume of high quality research that major UK research universities publish, and which supports their elevated international standing. Shortfalls in APCs cannot be added to the unfunded real cost of research already burdened onto universities. Green OA (with appropriate embargo) forms an important part of the publishing environment, particularly during transition to full OA. Repositories should be more encouraged as a means to communicate research. Plan S will have a disproportionately negative impact on smaller learned societies and publishers. The inability to charge subscriptions, or the requirement to make all content OA without embargo, may destroy the business case for highly valued and long-standing scholarly publishers that already offer outstanding value, serving only to consolidate research publication routes into an ever smaller number of global publishers. Research monographs, for example in the humanities, should continue to lie outside the guidelines.

**Compliance.** The support for Plan S goals from researchers will be undermined if demonstration of compliance becomes time-consuming, costly and administratively complex. The method to evidence compliance of hybrid journals to a transformative agreement is vague and opaque, and likely highly unattractive (and therefore ineffective in meeting Plan S aspirations) to hybrid journal publishers.