

## **Plan S Consultation Response from the European Society of Endocrinology**

The European Society of Endocrinology (ESE) is at the centre of Europe's endocrine community. It is our vision to shape the future of endocrinology to improve science, knowledge and health. It is our mission to advance endocrinology. We unite, support and represent our specialty, promoting collaboration and best practice, and enable our community to develop and share the best knowledge in endocrine science and medicine.

We are involved in the publishing of two, high-quality, peer reviewed scholarly journals. The *European Journal of Endocrinology*, which is wholly owned by ESE and currently operates a subscription and 'hybrid' open access model with all content made freely available 12 months after publication and *Endocrine Connections* which is a fully open access journal jointly owned by ESE.

ESE supports the principles of open science and is in favour of a managed transition to sustainable open access business models for scholarly scientific journals. We also support moves for open access article publishing charges (APCs) to be paid centrally by funders or institutions rather than by individual researchers.

While some of these aspirations are shared by cOAlition S we have significant concerns regarding many aspects of Plan S which we feel are counterproductive and we do not therefore support Plan S as currently proposed.

### **Timeline**

We seek a managed, sustainable transition to full open access as soon as possible but do not believe that such a complex transition can realistically be achieved by 1 January 2020. If funders aligned with Plan S are willing to provide funds for APCs and content to permit publication in 'hybrid' subscription journals then we believe that the central objective of Plan S, namely that "After 1 January 2020 scientific publications on the results from research funded by public grants provided by national and European research councils and funding bodies, must be published in compliant Open Access Journals or on compliant Open Access Platforms" is entirely achievable. In any other circumstance we believe the deadline for Plan S is not achievable without severely restricting the researchers freedom to publish in the journal of their choosing, a freedom which we passionately support.

### **Principle 1**

**Authors retain copyright of their publication with no restrictions. All publications must be published under an open license, preferably the Creative Commons Attribution License CC BY. In all cases, the license applied should fulfil the requirements defined by the Berlin Declaration**

ESE Response: We are supportive of the principle that authors publishing in an open access mode should retain copyright and believe authors should be given the choice of which licence to publish their work under.

**Principle 2**

**The Funders will ensure jointly the establishment of robust criteria and requirements for the services that compliant high-quality Open Access journals and Open Access platforms must provide**

ESE Response: We welcome clarity on funders' criteria regarding services required from publishers but believe that publishers must be allowed to operate in a free market which affords publishers the commercial opportunity to benefit from investment, innovation and high service levels.

**Principle 3**

**In case such high quality Open Access journals or platforms do not yet exist, the Funders will, in a coordinated way, provide incentives to establish and support them when appropriate; support will also be provided for Open Access infrastructures where necessary**

ESE Response: We feel that in our discipline high quality open access venues already exist so we have no comment on this principle save to say that we are in favour of free market economics.

**Principle 4**

**Where applicable, Open Access publication fees are covered by the Funders or universities, not by individual researchers; it is acknowledged that all scientists should be able to publish their work Open Access even if their institutions have limited means**

ESE Response: We strongly support the principle that open access APCs should be covered by funders or universities not by individual researchers and that ability to pay should not be linked to ability to publish. We do, however, note that many researchers in our discipline are practicing clinicians and often do not have access to funding for APCs. This is even true for clinician-researchers at some otherwise well-funded hospitals so Plan S must account for the fact that the ability to pay is not just an issue for the developing world.

**Principle 5**

**When Open Access publication fees are applied, their funding is standardised and capped (across Europe)**

ESE Response: We do not support the principle that APCs should be capped. We consider this untenable across vastly different disciplines of scholarly endeavour, and to be uncompetitive and against the free market economics that we believe are vital for a vibrant scholarly publishing ecosystem.

**Principle 6**

**The Funders will ask universities, research organisations, and libraries to align their policies and strategies, notably to ensure transparency**

ESE Response: In principle we generally welcome alignment and transparency in the strategies and policies of funders and research organisations.

**Principle 7**

**The above principles shall apply to all types of scholarly publications, but it is understood that the timeline to achieve Open Access for monographs and books may be longer than 1 January 2020**

ESE Response: ESE does not publish scholarly monographs but our members are authors and consumers of such works and we note that it is vital that the important, but often niche, market for scholarly monographs continues to be well served.

**Principle 8**

**The importance of open archives and repositories for hosting research outputs is acknowledged because of their long-term archiving function and their potential for editorial innovation**

ESE Response: It is our view that the scholarly record, the so called 'minutes of science', are best archived via scholarly journals as they have been for more than three and a half centuries. Journal platforms are,

thus far, considerably more discoverable, functional, innovative, interoperable and interlinked, and offer better version control than repositories. It is also our view that almost all “editorial innovation” has come from peer reviewed journals and that there has in fact been very little if any such innovation in open archives and repositories in their 30-year history. We therefore feel there is virtually no evidence to support the assertion regarding “their potential for editorial innovation”.

#### **Principle 9**

##### **The ‘hybrid’ model of publishing is not compliant with the above principles**

ESE Response: We do not understand why the ‘hybrid’ model is incompatible with the key aim and the principles of Plan S. In fact we can see nothing in the principles that is incompatible with ‘hybrid’ open access models and as we note above believe that providing funding for publication in fully open access and ‘hybrid’ open access journals is the only way to achieve the key aim of Plan S on the timescale proposed. The ‘hybrid’ model is a transformative model that allows journals to make a managed transition to open access which is largely determined by choices made by funders and authors. To remove the ‘hybrid’ model is counterproductive as it is likely to slow progress to open access rather than accelerate it.

#### **Principle 10**

##### **The Funders will monitor compliance and sanction non-compliance.**

ESE Response: We of course accept and support funders’ rights to monitor and sanction non-compliance.

As a scholarly society and a medical and scientific charity we are anxious that there may be unintended consequences of elements of Plan S that potentially create an advantage for commercial open access publishers and the largest commercial publishing houses. We are concerned by reports of clandestine meetings and collusion between influential individuals involved in cOAlition S and a well-known commercial open access publisher which at the very least appears to be counter to the coalition’s principles of openness and transparency. We also note that currently transformative ‘read and publish’ deals are only accessible to largest commercial publishers and that Plan S thus has the capacity to divert even more of the limited funds available in the scholarly publishing ecosystem to the profits of the largest commercial publishers which we presume is not the intention of cOAlition S.