Plan S Resonse:
Irish Humanities Alliance

February 2019



#### Overview:

The Irish Humanities Alliance (IHA) welcomes the opportunity to comment on the Plan S initiative to make full and immediate Open Access to research publications a reality.

The IHA broadly welcomes the overall principles underpinning Plan S and acknowledges the desirability of making the outputs of publicly funded research more freely available. Enhanced access to knowledge is critical to informed citizenship and the ideal of an open, democratic society. We welcome initiatives that facilitate the dissemination of scholarship to a wider audience and believe this will foster new developments in knowledge. Open access should, however, facilitate trust in scholarly work through increased transparency and we are concerned that this could be undermined under the current iteration if there is no established peer review system in new Open Access journals. For this, and other reasons, we recommend that the planned schedule for implementation in January 2020 be revised.

From a humanities perspective we would like to see recognition that **hybrid journals are not incompatible with the principle of Open Access**. They themselves are already playing a key role in facilitating its development and extension in certain Humanities disciplines. In the current funding landscape, these hybrid journals should not be seen as an obstacle to Open Access. Moreover, while the rising costs of journal subscriptions is an ongoing concern, we believe that Plan S, as currently devised, risks shifting the 'publication paywall' from reading to publishing with implications for smaller institutions and the minority disciplines. Below we identify potential, negative implications with specific reference to: licences; the humanities disciplines; research excellence; and career trajectory.

# 1. Licences:

- Too many details with regard to licencing are still unclear and this is reason enough to believe that the current January 2020 timetable for implementation is not feasible.
- Further clarification is needed regarding the **protection of intellectual rights of authors** and the type of open licence to be used. Plan S should ensure an appropriate degree of choice for researchers and should also allow for exceptional cases.
- While claiming that "authors retain copyright of their publications with no restrictions", the document then requires scholars to waive most of their rights apart from the moral right of attribution. Scholars should be recognised as the creators of their work, be cited appropriately and retain some intellectual property rights
- We recommend the inclusion of No Derivatives in the licence for any Open Access publication so as to ensure that text is not taken out of context for commercial or other inappropriate use. This is especially important to the humanities disciplines where the text of the article, chapter or book is the core of the research or scholarship

# 2. Humanities Disciplines:

 Plan S appears to ignore the very significant differences that exist between different research fields. In its current iteration, Plan S pays insufficient attention to the distinct, publishing landscape of the Humanities, in which publishing operates in a significantly different way from the way it does in STEM disciplines

- We are particularly concerned that a 'one size fits all' model would favour those institutions and disciplines with access to the largest share of the funding. This risks creating a two-tier system that benefits better funded disciplines or institutions that have the resources to bear the costs of Open Access publication.
- Gold open access carries a particular risk in that payment of publication costs are shifted away from subscribers to the authors. Introducing an upfront payment to be covered by the institutions in order to make an article available introduces a bias as some fields are significantly better funded than others. This is especially true at a time when resources within the humanities and social sciences are constrained. Plan S needs to consider the special circumstances of non-science disciplines, and especially the minority disciplines.
- While welcoming the statement that guidance on Open Access monographs and book chapters will be issued at a later date, we would emphasise the singular importance of monographs and edited books within the humanities disciplines. These remain the main currency for career development within the humanities disciplines.

# 3. Research Excellence

- In terms of research infrastructures, **compliance with Plan S** depends on publishing in compliant Open Access journals or platforms. However, these are not evenly developed across disciplines or jurisdictions. Before implementation, there will need to be appropriate **pilot schemes, technical guidance and financial supports to create the required infrastructures**.
- We are also concerned with the implications for those publications managed by learned societies. These are usually funded by endowments and membership fees and often operate in regional, national, and international contexts that may not fit governmental funding parameters. These reinvest the money from publications into the academic system through scholarships, grants, thesis publications, conferences etc. Some of these disciplinary learned societies have guaranteed the survival of crucial branches of science often ignored by mainstream research funding. These organisations play an important role in a retaining a wide base for science and in developing research interests.
- Maintaining research and scholarly excellence in the humanities must remain the core pillar of the research process through robust peer-review. Robust peer review and editing are essential to the humanities journals and the validation of the scholarship they publish and ensuring that the work stands the test of time. It is important to emphasise that these processes, although they rely on the voluntary and usually unpaid labour of academic reviewers and editors, are not cost free. In the hybrid journals established systems of peer-review are already in place whereas Plan S acknowledges that newly established Open Access journals will not have a solid system for reviewing in place.
- Plan S stipulates that the hybrid model of journal publishing is incompatible with the principles underpinning Open Access. Humanities journals are overwhelming published on a hybrid basis because the majority of the articles they publish are not publicly funded. In the current funding landscape for the humanities we don't see how it will be possible for such journals to become Open Access. We would, therefore, encourage recognition of the value of hybrid journals as compatible with the principles of open access.

# 4. Career Development

 Peer-review publication – particularly in journals/publishing houses with an international reputation for academic excellence – remains the primary currency for career development. Given that Plan S is primarily a European initiative

- there is a risk that it could have a detrimental impact on career prospects given that the choice of countries with which academics can conveniently collaborate may be restricted.
- We are particularly concerned that this could seriously **disadvantage early career researchers** where, at present, a track record of publications in "high impact" journals is considered an essential criteria for career development.
- In stipulating that the hybrid model of journal publishing is incompatible with Open Access there is also the risk that Plan S could foster insularity. Publicly funded scholars in Europe would find themselves unable to publish in noncompliant international journals. Scholars should have the freedom to choose publication venue and – while complying with Open Access mandates – be able to choose how papers are made Open Access.

# **Further information**

Irish Humanities Alliance – Promoting the Value of the Humanities 19 Dawson Street, Dublin 2, Ireland E. info@irishhumanities.com