

Response to Consultation on Plan S

We write as the editors of a number of academic journals in History and associated Humanities disciplines, based in the UK, continental Europe and North America, in collective response to the call for feedback about the proposals for the implementation of Science Europe's Plan S.

The overall aim of Plan S, to make publicly funded research freely accessible to all users, is a laudable one. As a group we are committed to the principle of Open Access (OA). We welcome initiatives that facilitate the dissemination of scholarship to the widest possible audience and that enable new developments in knowledge. We endorse the objective stated in the Guidance document of creating a culture that ensures that young scholars have opportunities to excel and advance their careers. A transparent, fair and efficient system of scholarly publishing that does not discriminate against researchers or institutions with no or limited ability to pay APCs is clearly in the interests of our discipline. We also share Plan S's insistence on the need for robust and sustainable OA repositories that will preserve and curate scholarly publications for future generations.

We are, however, concerned about some key aspects of Plan S and about their workability in practice, particularly (but by no means exclusively) within the landscape of the Humanities, in which publishing operates in a significantly different way from the way it does in STEM disciplines. We know that many of the concerns articulated below are shared by our colleagues in STEM, but we call for greater recognition of the complex ecology of HSS publishing and urge closer consideration of the differential impacts and possible unintended consequences of the ambitious plans laid out in the Guidance document. We seek clarification about several dimensions of the mandate that appear to be in tension with the overall objectives of Plan S. We also wish to highlight the challenges posed by the very short time frame for implementation and to question whether it will be possible to create the necessary mechanisms for facilitating full and immediate Open Access to publicly funded research publications by January 2020.

Hybrid Journals

Plan S is predicated on the assumption that the hybrid model of journal publishing is incompatible with the principles underpinning Open Access and should be phased out. This is a claim that we find very hard to accept. Humanities journals are overwhelmingly published on a hybrid basis for the simple reason that the majority of the articles they publish are not funded by national governments, the ERC, or charities. Across the broad sweep of History journals, only about 15% of articles are currently published via the Gold OA route, because most authors do not have access to institutional or other funds to pay APCs. The rest are published via the Green OA route, whereby authors pay nothing for publication but make their accepted manuscripts available via an institutional or other repository, after an embargo period. For the most part such journals (many of them published by or for learned societies rather than large commercial conglomerates such as Elsevier and Springer-Nature) charge relatively modest subscription rates that allow them to cover the costs of their editorial operations and that are often reduced for low-income and third world subscribers. The institutional subscriptions for *Past and Present*, for instance, are £279 for print; £223 for online; and £303 for the bundle. The print subscription for developing countries is just £33. For the *Economic History Review* the first three figures are £366, £366 and £458; for the *Historical Journal*, £465, £399 and £484; for the *English Historical Review*, £403, £331 and £437; for *German History*, £308, £258, and £334. The *American Historical Review* standard

institutional print subscription is £229, while its print and online bundles range from £52 to £490 depending on the size and nature of the organisation; for the online-only *Journal of Social History*, the subscription is £88.

Unless levels of public funding for Humanities research increase very significantly, it is difficult to envisage how it will be possible for such journals to afford to flip to full Open Access within the transition period allowed for in the Guidance document, or indeed in any later period. Given the low proportion of funded articles in our journals, revenue from APCs (at their present levels) will be insufficient to make it viable to enter into the kind of three-year transformative agreement outlined there. It is hard to see that a business model can be devised that will enable these journals to sustain their commitment to maintaining the high standards of peer review and editorial intervention of the type that the Guidance document rightly insists must be in place. (These processes, which play a vital part in maintaining and validating scholarly standards, are not cost-free, as is further emphasised below.) We estimate that APCs would need to be multiplied four or five times in size for many of the undersigned journals to continue their operations. This will be even more challenging in the context of the requirement that journals must provide automatic APC waivers for authors from low income countries and discounts for authors from middle-income countries (a measure whose underlying principles we applaud). It should also be noted that some journals also publish substantial amounts of content that will not be eligible to be covered by APCs, including book reviews and review articles. This has not yet been adequately factored into Plan S as currently outlined.

The result will be that most existing journals will be compelled to make a stark choice between compliance with the principles of Plan S and non-compliance in the interests of continuing to serve the bulk of their existing constituencies of authors. In many cases, this includes substantial percentages of authors from countries in which there is currently no national gold OA policy or set of requirements, including the USA and many parts of the Global South, and who have no access to funds to pay for APCs. Non-compliance is the most likely choice, given the constraints as set out above. World-leading journals such as the *American Historical Review*, *Renaissance Quarterly* and *Past and Present* would therefore not be able to publish cOAlition S funded research. The result would be to skew and bifurcate scholarly publishing in regrettable ways. It would create a divide between European and other scholars, as well as between funded and unfunded scholars. It would also differentiate affiliated from unaffiliated independent scholars without access to funds more sharply. It would have a particular impact upon the early career researchers that Plan S is explicitly determined to support in the development of their careers, many of whom have one or more periods of postdoctoral life without a university affiliation or research contract. Freedom of access might consequently come at the cost of freedom to publish. The result might be new forms of exclusion that limit and constrain who is able to contribute to the formal production of knowledge.

We urge recognition of the point 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 History and the Humanities more generally. We would argue that they should not be seen as an obstacle but as an aid to its realisation.

Unintended consequences and collateral damage

We believe that Plan S's drive to eliminate hybrid journals in favour of fully OA ones might also have a number of other regrettable unintended consequences.

One of these is the danger that these developments could, perversely, foster insularity rather than promote international exchange. cOAlition S funded scholars would not be able to publish in non-compliant international journals (including virtually all North American journals). In turn foreign scholars from outside the UK and Europe will not be able to afford to publish in compliant OA journals because they would not have access to the necessary funds. Alongside archives and libraries, academic journals are the laboratories of the humanities. They are collaborative spaces and enterprises that contribute materially to the international republic of letters and to conversations and dialogues that transcend boundaries and frontiers. They are successful in doing so precisely because there is no cost entailed in submitting to such journals. There is a risk that this culture of exchange will be impoverished and threatened by the elimination of hybrid journals.

A second unintended consequence might be to erode the high standards of quality control, peer review and editing that Humanities journals regard as essential to the validation of the scholarly articles they publish. 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. Journals need to employ copy-editors, proof readers, and support staff to coordinate submissions, oversee the formatting of manuscripts in accordance with disciplinary standards, and liaise with typesetters and publishers. Supported by the income generated by subscriptions, such processes play a vital and indispensable part in the making of knowledge. They contribute to the international reputation and reach of the History journals listed here, which are respected and trusted for the rigorous processes of scrutiny to which submissions are subjected and their commitment to excellent standards of presentation. Such standards are vital to ensuring that scholarship stands the test of time: some articles have a lasting value for decades, which would be undermined if short cuts were taken at the assessment and production stage. Plan S recognises that ‘solid systems’ for reviewing will need to be established for new fully OA journals. In the Humanities, these are currently very rare, so they will have to be set up from scratch, by new teams of researchers, on platforms which remain unclear. Yet such systems are already firmly in place and tried and tested in hybrid journals, whose contribution to facilitating Open Access via the Green route should be properly recognised.

Making publication in hybrid journals uncompliant is likely to have a third unforeseen side-effect. Many hybrid journals are published by learned societies, which use the income from subscriptions to finance their publishing operations and to further the objectives of organisations that are often registered charities. The income they derive from journal publishing is fed back into the scholarly community in a variety of ways that are vital for the health and development of the profession. It is used, among other things, to support PhD studentships and postdoctoral fellowships, to fund book and article prizes, to finance conferences, workshops, networks, and other academic activities, to facilitate collaborations with museums and other bodies, to support key initiatives in our disciplines, and to assist international scholars under threat. In this respect, via their publishing operations learned societies play an under-acknowledged role in supporting the knowledge economy. Driving hybrid journals into extinction will limit the ability of learned societies to contribute to this and even, in some cases, threaten their very existence. Plan S rightly seeks to constrain the practices of predatory publishers, but the strategies it proposes to adopt to achieve this are likely to do so at the expense of learned societies which seek to serve and represent their disciplines.

Licences

Plan S mandates that publicly funded research must be published under the most permissive CC BY licence, which allows for reuse and adaptation of any kind, provided that the original author is acknowledged. It nevertheless insists that copyright of the work will remain with the legal copyright holder (the author or his/her institution). The CC BY licence poses particular problems for those who work in the Humanities, where the content and form of scholarly findings are not easily distinguishable, and where the line between raw data and the argued presentation of such data is harder to draw. We think it would be a mistake to rule out the possibility of a CC BY ND licence. This provides protection against practices that historians regard as unacceptable, if not unethical. In Humanities disciplines, the practice of copying and altering the words of another author without specifying the changes made is defined as poor and unsatisfactory academic practice. Students are penalised and disciplined for doing this, which has the potential to distort and contort the meaning of the texts from which they are derived. Researchers would also have no control over inaccurate translations (for, unlike in Science and Medicine, the majority of European Humanities research is not published in English). And, although the Guidance document insists that third party content is not affected by the CC BY requirements, our collective experience is that in practice it is very much more complicated, not least because of the conditions for the use and reuse of images, graphics, etc. that are laid down by the repositories (archives, libraries, museums, etc.) who own such material. Such repositories commonly charge reproduction fees that themselves add further to the costs of publishing, and are already in some cases quite prohibitive. The process of obtaining permissions for fully OA publications is often even more time-consuming and expensive because of the policies of these institutions, and will present particular challenges to those, such as art historians, whose research depends heavily on illustration.

Process and time frame for implementation

Finally, we wish to highlight the considerable challenges presented by the proposed timeline for implementation of full OA. As indicated above, it is difficult to envisage that existing journals will be in a position to create the ‘innovative new publishing models’ envisaged by Plan S or even to work out viable transformative agreements by January 2020. Given that the deadline for the consultation process only closes in February 2019, the proposed timetable seems unrealistic. We would also underline the complexity of establishing Open Access repositories that meet the technical standards laid out in the Guidance document, including those regarding automated manuscript ingest facilities, metadata, quality assurance and helpdesk support. This will inevitably be costly and there is the associated danger that the provision of appropriate repositories will consequently be commercialised in the same way that some forms of journal publishing have become. It may, therefore, have the inadvertent effect of consolidating rather than diminishing the place of large commercial publishers in the publishing landscape. Plan S says that cOAlition S members will collectively establish incentives for establishing Open Access journals/platforms where there are gaps and needs, but clarification is needed on the form that these incentives will take. Without significant investment by national governments, it seems unlikely that the ambitious objectives of Plan S can be achieved within the period envisaged.

We conclude by urging full and careful consideration of the issues we have raised. Precipitate implementation of Plan S without adequate exploration of the particular challenges it poses to scholars in different disciplines and without taking due account of the distinctive publishing landscape of Humanities research may have unfortunate and deleterious consequences. As emphasised at the outset, we too are committed to disseminating scholarly research as widely

as possible and to expanding access to it, but we do not believe it is the interests of anyone to do so at the cost of hybrid journals and of the learned societies which they serve and sustain.

Alexandra Walsham and Matthew Hilton, editors, *Past and Present*

Stephanie Kitchen, Managing Editor, *Africa: Journal of the International African Institute*

Kathryn Salucka, managing editor, *African Studies Review*

Richard Hoyle, Henry French and John Broad, editors, *Agricultural History Review*

Frank James, Chair of the Society for the History of Alchemy and Chemistry, Anna Simmons, Secretary of the Society, and Bruce Moran, editor of the Society's journal *Ambix*

Alex Lichtenstein, editor, *American Historical Review*

Ute Lotz-Heumann and Marjorie Elizabeth Plummer, editors, *Archiv für Reformationsgeschichte/Archive for Reformation History*

Gregory Perry, CEO, *The Association for Art History*, Dorothy Price, editor, and Jeanne Nuechterlein, deputy editor, *Art History*

Katy Gibbons and the editorial board, *British Catholic History*

Charlotte Sleigh, editor, *British Journal of the History of Science*

Steven French and Wendy Parker, editors in chief, and Beth Hannon, assistant editor, *British Journal for the Philosophy of Science*

Liz Potter, publications and web manager, and Greg Woolf, director and editor of *Bulletin of the Institute of Classical Studies*, Institute of Classical Studies, London

Benjamin Marschke, Executive Director of Central European History Society, and the editors and editorial board of *Central European History*

Euan Cameron, Dana Robert, Jon Sensbach and Andrea Sterk, editors, *Church History*

Andrew Shryock, President of the Society for the Comparative Study of Society and History, and Geneviève Zubrzycki and Paul Christopher Johnson, editors, *Comparative Studies in Society and History*

Sian Edwards, Chris Moores, Lucy Robinson, Camilla Schofield and Tony Shaw, editors, *Contemporary British History*

Ludvine Broch, Matthew Frank, Celia Donert, Dominique Reill, Emile Chabal, Christian Bailey, David Brydan and Victoria Harris, editors, *Contemporary European History*

Chris Briggs, Susan Leonard, Julie Marfany, and Mary Louise Nagata, editors, *Continuity and Change*

David Nash, editor, *Cultural and Social History*

Ulrich Tiedau, coordinating editor, *Dutch Crossing: Journal of Low Countries Studies*

Marios Costambeys and Roy Flechner, editors, *Early Medieval Europe*

Iain Fenlon, editor, *Early Music History*

Sara Horrell, Giovanni Federico and Patrick Wallis, editors, *Economic History Review*

Catherine Holmes, Peter Marshall, Hannah Skoda, Stephen Conway, Catherine Wright and Kim Reynolds, editors, *English Historical Review*

Steven King and Carol Beardmore, editors, *Family and Community History*
Joseph Clarke and Julian Wright, editors, *French History*
David Andress, president of the Society for the Study of French History
Barbara Simms, editor, *Garden History*
Joachim Whaley and Nick Stargardt, editors, *German History*
Emma Griffin and Sujit Sivasundaram, editors, *The Historical Journal*
Julie Spraggon, executive editor, *Historical Research*
Rebecca Sullivan, CEO, The Historical Association, on behalf of the journal *History*
Christian Wedemeyer and co-editors, *History of Religions*
Jamie Wood and Lucinda Matthews-Jones, convenors, *History UK*
The History Workshop collective (on behalf of *History Workshop Journal*)
John Reuben Davies, editor of the *Innes Review*
Jo Fox, director, *Institute of Historical Research*
The Newcomen Society, which publishes *The International Journal for the History of Engineering and Technology*
Catherine Cox and Graham Brownlow, editors, *Irish Economic and Social History*
Liam Chambers and Marie Sullivan, editors, *Irish Historical Studies*
H. Floris Cohen, editor, *Isis*
Carolien Stolte, editor, *Itinerario*
Shane Doyle, Emily Osborn, Greg Mann, and Keith Breckenridge, editors, *Journal of African History*
Tom Nickson, editor, *Journal of the British Archaeological Association*
Jeffrey Collins and Sandra den Otter, editors, *Journal of British Studies*
Mark Kramer, editor, *Journal of Cold War Studies*
Alec Ryrie, co-editor, *Journal of Ecclesiastical History* and VP of the EHS
William Clarence-Smith and Merry Wiesner-Hanks, editors, *Journal of Global History*
Arthur MacGregor, editor, *Journal of the History of Collections*
Martin J. Burke, Stefanos Geroulanos, Anthony Grafton and Ann Moyer, editors, *Journal of the History of Ideas*
John Boyer and Jan Goldstein, editors, *Journal of Modern History*
Ewen Cameron, editor, *Journal of Scottish Historical Studies*
Martin Bellamy, editor, and the editorial board of the *Mariner's Mirror*
Angus Burgin, Duncan Kelly, Tracie Matysik and Darrin McMahon, editors, *Modern Intellectual History*
Marc S. Rodriguez, editor, *Pacific Historical Review*
David Hayton and Richard Gaunt, editors, *Parliamentary History*

Jessica Wolfe, editor, *Renaissance Quarterly*

Jennifer Richards, editor, *Renaissance Studies*

Richard Maber, editor, *The Seventeenth Century*

Merry Wiesner-Hanks, senior editor, *Sixteenth Century Journal*

Sarah Spence, editor, and the editorial board, *Speculum*

Kay Schiller, editor-in-chief, *Sport in History*

Charlotte Methuen and Andrew Spicer, editors, *Studies in Church History*

Andrew Spicer, editor of *Transactions of the Royal Historical Society* and also co-editor of *Studies in Church History*

Helen McCarthy, Guy Ortolano and Adrian Bingham, editors, *Twentieth Century British History*