'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'.

The Society for Renaissance Studies publishes a world-class, interdisciplinary and international hybrid journal with Wiley-Blackwell. Profits from subscription are split between W-B and the Society. Since 2012, the journal and the society have been committed to Open Access. In 2012, along with other humanities journals, we argued for hybrid journals, and for Green Open Access with an embargo period of two years. In this brief response to the consultation, we reaffirm our commitment to OA as a principle. We endorse the idea that peer-reviewed research should be published at no cost to the individual author. We welcome the recognition in Plan S that repositories and open archives need to have a long-term archiving and curation function. However, we also repeat our defence of the hybrid model.

So why do we still support Green OA with an embargo period given our commitment to OA?

We argue that the insistence on immediate compliance for funded research is inappropriate and dogmatic, based on a misunderstanding of and/or a lack of interest in the Humanities and its funding models. We argue that in 2018, just as in 2012, there has been no attempt to recognise the work of learned societies or their business models. In the UK, our main Research Council, the AHRC, currently receives only 2.8% of the budget of the EPSRC. (This is despite the fact that heritage tourism generates ca £30 bn p/a while the creative industries are worth over £90 bn p/a; these areas are supported directly and indirectly by the research that we do and the people that we teach and train.). Learned societies are not talking shops. In addition to disseminating peer-reviewed work free of charge to authors, whatever their financial circumstances, learned societies such as SRS uses their funds to support the next generation of scholars through mentoring schemes, post-doctoral fellowships, and conference funding. Learned societies have been urged by cOAlition S to get on board with their plans. We invite cOAlition S to engage with our communities, and to review and understand the work and culture of learned societies in the Humanities, and, even better, to join us in arguing for greater public funding of research in the Humanities.

We do not think it is in the interests of Humanities research communities to oblige journals and societies to choose between compliance with the principles of Plan S and non-compliance, between those who are funded by public grants and those who are not, between those who can afford to pay APCs, and those who cannot. We urge cOAlition S to share with us the results of their work on Equality and Diversity. Are we confident that researchers in groups 'protected' by the UK Equality Act 2010 and its Northern Irish counterparts have equal access to the same public funds as those who are not?

We would draw the attention of cOAlition S to the following additional points:

i. The majority of the articles we publish are not publicly funded (UKRI; Wellcome). They are usually funded from QR or— in the case of ECAs ('the precariat'), independent scholars and emeriti—self-funded. We believe that, until there is increased investment in the humanities, and until there is debate about alternative funding models, the current hybrid model best protects our interests.

- ii. The subscription rates of humanities journals are modest, and not at all comparable to those of STEMM journals published via the large publishing conglomerates. Profits shared with the learned societies are used to support the host of activities described above. Our investment in postdoctoral fellowships, for example, has supported excellent ECAs who have gone on to successful careers.
- iii. We value our relationship with our publisher, who provides a professional service that we as 'volunteers' cannot, and providing a world-class venue for the work of scholars from around the world. This service includes copy-editing and high-quality print-publication, essential for a journal that specialises in Art History; and the maintenance of a platform that maintains the process of fair, anonymous, rigorous, fully transparent peer review. (Plan S acknowledges robust systems for OA are needed. Such systems, which carry a cost, are not in place yet.)
- iv. Our journal is international and interdisciplinary. We review work mainly by researchers based in the UK, Europe and North America, but we also review work by scholars from across the world. We are concerned that Plan S, if implemented, would limit our reach to those with the means to pay APCs.

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.

Our authors are currently asked to sign the CC-BY licences with the non-derivatives clause. To replace this with the most permissive license that allows for re-use and adaptation of any kind, provided that the original author is acknowledged, is not acceptable to the majority of Humanities scholars, where the line between raw data and its argued presentation is much harder to draw. The current license offers protection against uses of our work that are regarded by many in our community as unethical (plagiarism).

3rd-party rights are a serious problem with the more permissive license: there is a lack of consistency in the permissions policies of archives and galleries for the reproduction of non-text sources. This is a particular problem for researchers in Music and Art History – two of the several fields that we support. Publication rights are normally time-limited (for example, three to five years); renewal of rights may be costly and burdensome for OA work, or permissions given only for poorer quality reproduction.

Jennifer Richards,

Editor, Renaissance Studies