



University of Bristol Feedback to Plan S Consultation

We welcome the opportunity for the University of Bristol to be able to provide feedback on Plan S. As a research-intensive institution, the University of Bristol is fully supportive of the underlying principles of open access to research. However, there are significant concerns within the University about some of the expectations and timescales of Plan S as it is currently conceived. The following feedback has been put together in consultation with the University's Open Access Steering Group and the University Research Committee.

1. Is there anything unclear or are there any issues that have not been addressed by the guidance document?

“Science” vs “Research”

While we understand that “Science” is the correct term to use in much of Europe, in the UK it has a different connotation and to many of our researchers, appears to exclude arts and humanities researchers. It has traditionally been difficult to engage arts and humanities researchers, so this could have a detrimental effect on the uptake of the policy. When discussing Plan S in the UK, it would be better to use the word “Research” instead.

Impact on Arts and Humanities

Whilst Plan S doesn't specifically endorse Gold Open Access, other requirements (such as the zero-month embargo) points more fully towards a publication model of “author pays”. This change will have greater impact on Arts and Humanities publications which tends to rely on smaller (often learned-society based) publishers who may not have the infrastructure or business models to be able to make the transition to fully Open Access journals. Whilst Plan S recognises that OA for monographs and books may take longer than the 2020 aspiration, the cost of author pays for monographs is even higher than for journals.

Journals vs Publishers

The Implementation Guidelines focus on changes to journals rather than publishers. However, as an institution our interactions are with publishers. Policies need to be changed at the publisher level rather than the journal level as we purchase APCs and subscriptions in bulk deals from publishers, rather than from individual journals. The focus on journals means that even if some of a publisher's journals become Plan S compliant, we won't be able to support them as we have to pay the publishers as a whole. Currently ~75-80% of OA expenditure is not compliant with Plan S guidelines. Therefore, a very large and rapid shift in publishing culture and publisher business models would be required to comply with Plan S.

Difficulties with a Gold Only research environment

If most publishers do transition to “Gold Only” journals then this will cause a significant problem for our researchers that are not directly funded by a Plan S funding body (again this will have a greater impact in the Arts and Humanities). The requirement to pay an Article Processing Charge without formal funding will result in very limited publishing avenues available to these authors, despite them not being directly signed up to the principles of Plan S.

There seems to be an expectation that libraries will be able to pay for the increase in Gold Open Access by transferring money from subscription budgets to open access budgets. However, institutions will still need to subscribe to the non-open access back catalogues of publishers, even if

they all transitioned to Gold Open Access. The cost of publishing all research will be prohibitive for research intensive institutions such as the University of Bristol.

Publishers are beginning to offer “Read and publish” deals in the UK which will generally lock an institution in for the next three years and before the sector can get a clear sense of how UKRI might implement Plan S.

The suggestion of a cap on the cost of an APC may compound the problems of finding sufficient funding for publishing articles (unless the cap for APCs is dramatically lower than the current average or funders contribute significantly more money). With a lack of compliant journals (under the current suggested implementation), will leave many researchers with very restricted options for where to publish.

Technical requirements for repository platforms

Many of the requirements that the Plan S implementation guidelines place upon repository platforms are beyond the current capabilities of most repositories. Repository software companies are unlikely to be able to make these changes in time for Plan S implementation and given the worldwide customer base of some of these software companies (the University of Bristol's included) the changes may not be considered acceptable/viable. We agree with the feedback provided by the Confederation of Open Access Repositories (COAR) on the repository requirements (<https://www.coar-repositories.org/files/COAR-response-to-implementation-of-Plan-S-1.pdf>).

Implementation of zero-month embargoes

The zero-month embargo requirement is particularly tricky for Open Access repositories to manage as there will inevitably be logistical delays in receiving and processing the author accepted manuscript. It has generally been possible to make an author's accepted manuscript available within three months of publication. While it might be possible to reduce this time, it would not be possible to eliminate it completely.

2. Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?

Embrace the Benefits of Green Open Access

Plan S Principle 8 acknowledges the importance of repositories because of their “Long-Term archiving function and their potential for editorial innovation” but neglects that repositories are a key piece of Open Access infrastructure.

Green Open Access repositories can ensure Open Access for all researchers, not just those with access to funding. Green Open Access is also a more responsible use of funding than Gold Open Access.

The mechanisms of Plan S and the implementation guidelines seem to strongly favour a switch to Gold Open Access and to place a far smaller emphasis on Green Open Access. Publishers have traditionally been concerned (needlessly in our opinion) that immediate green open access will lead to universities no longer subscribing to their journals. When presented with the choice of zero-embargo Green Open Access or the ability to continue receiving APCs from hybrid journals for three years, before going full gold, it seems very likely most publishers will opt for Gold Open Access. This would significantly hamper Green Open Access.

Funder Assessment practices

A mechanism that Plan S could use rather than restricting the venues that authors can publish in could be to encourage Plan S funders to assess research in a different way, moving esteem from the journals that an article is published in, to the merits of research. The Wellcome Open Research platform is an example of how funders can help in this area. This provides a clear positive incentive for researchers, rather than relying on negative incentives, such as reduced funding. The University is a signatory to the DORA principles and currently reviewing its own internal promotions framework but these changes are likely to take time to implement and fully embed in the institution.