This is a response to the Plan-S consultation from IIC, the International Institute for Conservation of Historic and Artistic Works, a learned society, a company limited by guarantee registered in England and Wales (No. 481522) and a registered charity (No. 209677). IIC has c.1,500 members, some 300 of these being institutions worldwide, such as museums and conservation training programmes within universities, the rest being conservation professionals at all stages of their careers. IIC's publishing partner is Taylor and Francis Routledge. IIC's journal *Studies in Conservation* is the longest established, the most respected, and the journal with the greatest number of international authors, from the several Taylor and Francis journals covering the conservation of cultural heritage. All of these began as printed journals, many from c.1975, and in IIC's case from 1954. *Studies in Conservation* publishes c.40 fully peer-reviewed papers annually in 8 issues, online and in print with hybrid open access, and has a 5-year impact factor greater than 0.5. Every two years, IIC publishes some 45-50 additional papers and the same number of short communications, in a supplement to the journal, styled as the preprints to the biannual IIC international congress. IIC also publishes postprints from related conferences organised by third parties.

IIC's mission is to promote best practice in the conservation of cultural heritage, through its publications and through networking provided by its website, publications and events. Disseminating relevant research results is a key activity of IIC, but not its primary activity. Like other learned societies, IIC reflects the profession it represents: there are many more practitioners and readers of the journal than there are authors who publish regularly in it. Many authors are not current members. The regular journal publishes a small majority of papers that constitute original research or review papers, and a considerable number of papers written by conservation practitioners. Significant papers are written regularly by recently retired members, by early career practitioners no longer affiliated to a university and working under short-term contracts, and by freelance professionals who own or work in small companies. *Studies in Conservation* is the journal of choice for full-time academic researchers working (currently) in cultural heritage as well as in STEM subjects, who seek to translate their research into practice.

Thus, 100% of IIC's published papers in 2017, and over 90% of the papers in the supplement that formed the preprints to the IIC 2018 congress, are 'unfunded' as defined by cOAlition. The journal and the subject encompasses both the physical sciences and the humanities, and in recent years the social sciences increasingly fall within its scope too. At the moment Plan-S is wholly inappropriate for such authors. Few current contributors to the journal, and certainly none from developing countries, are capable of covering author publishing charges (APCs), through their employer or non-existent 'funder' They would have to pay APCs personally from taxed income.

Plan-S threatens the content of the journal for every category of paper, and if implemented fully, it would greatly reduce the number of submissions. Plan-S would quite likely make *Studies in Conservation* and related Taylor and Francis cultural heritage journals unviable, without offering alternative publication routes. As the number of researchers covered by Plan S-compliant funding increases, it will, in time, put pressure on the business models of many learned societies, which rely on subscription-model hybrid journalsnot only to cover their publishing costs, but to generate revenue for other activities they undertake, such as maintaining an informative website for members and the general public, hosting meetings/conferences, and awarding fellowships and other grants.

In the humanities, online publishing that involves images of artworks in copyright is already perceived as expensive by authors who must pay reproduction fees to rights holders, often from personal accounts. In this sector, typical APCs cost 3-4 times typical reproduction fees.

IIC is constantly reviewing both its financial model and its relevance to the profession. Funding attendance at its congresses and mid-career CPD events is increasingly a target of IIC's partnerships and grant applications, to enable practitioners and students from developing countries and countries with adverse exchange rates to participate fully. Reduced membership subscriptions and grants offered by IIC are targeted at such individuals. This group in particular, which is motivated by participation and therefore publication in congress preprints, would be disadvantaged by Plan-S proposals, and would be completely priced out of publication in the journal, which undermines part of IIC's mission. It is, therefore, important that the wider value learned societies play in supporting researchers and contributing to a vibrant research ecosystem is fully recognised.

To reconfigure IIC's business and publishing model to accommodate Plan-S under a transformative agreement with IIC's publishing partner would be a major long term challenge. Likely it could not be achieved within 5 years. It is totally unfeasible in the 24 month period proposed by cOAlition, unless some form of transition funding is provided. Like other societies, IIC derives income firstly from subscriptions, free access to the journal being a major incentive for renewal, secondly from royalties, and thirdly from events and other income sources. Societies would need to significantly adapt their business and member engagement models to thrive under Plan S, which will take time.

Plan S seeks to move to a world where all research findings are made Open Access (OA). As such the funder signatories to Plan S will no longer fund Article Processing Charges for hybrid OA journals. The only way a researcher can publish in such a journal would be if the journal allowed them to deposit their accepted manuscripts in a suitable repository at the time of publication, without embargo, under a CCBY licence.

Greater thought needs to be given on how to avoid the publications schism that could develop between STEM research whose funding model is fairly well aligned to cOAlition principles, and interdisciplinary and humanities- weighted subjects like those covered by IIC.

Plan-S thus appears to IIC to be ill-considered in terms of the wider publishing and research arena, to be elitist because non-inclusive of most research outside the main STEM topics, and to pose a serious threat to the successful activities of an international learned society such as ours.

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