

An expression of concern for Plan S from Canadian Science Publishing

Canadian Science Publishing (CSP) is an independent, not-for-profit publisher of 24 international science and engineering journals. While we support Open Access (OA), as evidenced by the 3 OA journals and 21 hybrid journals that we publish, and we appreciate the goal of cOAlition S to make publicly funded research freely accessible, we have concerns about the viability of the proposed Plan S and how it could negatively affect our scholarly publications and our organization as a whole.

One of CSP's strategic goals is to support the research system through our exemplary publications. We feel that Plan S is putting that system at risk, and we are therefore submitting this letter as an expression of our concern. Note that we had the opportunity to read the letter of concern submitted by Canada's national association for scholarly journals (the Canadian Association of Learned Journals) and we are in agreement with their points on this matter as well. The main concerns we have, from our perspective as Canada's largest not-for-profit science journal publisher follow:

Threat to International Collaborations

Science is a global endeavor, and international collaborations serve only to benefit society. Without a standardization of funding agency OA mandates, we could very well see a decline in international collaborations, as researchers with funding from "non" Plan S agencies choose not to work with researchers with funding from a Plan S Coalition member for fear of being restricted in where they can publish, effectively restricting academic freedom. The Plan S Coalition mandates deviate too greatly from that of other major research funders.

Limited Number of Journals Eligible for Authors who Receive Plan S Funding = Infringement on Academic Freedom

Several author surveys (our own and others issued by major publishers) have shown that researchers choose to submit their articles to journals where their peers publish and go to read research in their field, but Plan S interferes with that choice by limiting the number of journals available to them for publication. The following will limit the journal choices for Plan S authors:

- Hybrid journals, embargoed journals, or journals with other models that are not fully OA will not be compliant.
- Existing journals that switch to OA or new OA journals will not be compliant until they are indexed in the Directory of Open Access Journals. In our experience with one of our OA titles, this process took a period of nearly two years due to our team

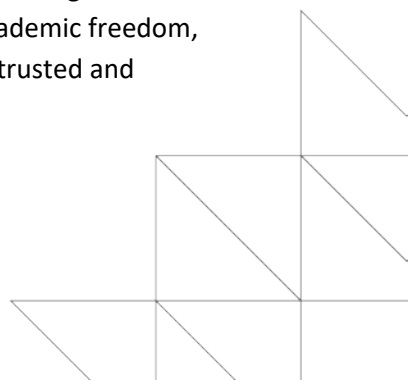


needing to make changes to the journal's web site to meet the compliance requirements and waiting for the journal to be evaluated for inclusion in the Directory.

- Journals who deposit their content in OA institutional repositories will not comply with Plan S unless the repository meets Plan S requirements, including making all their content available in XML in JATS standard (or equivalent).
- Scholarly publishers using the subscription model cannot easily switch to OA publications, for the following reasons:
 - Requiring authors to pay for publishing through article processing charges (APCs) is currently the dominant business model for fully OA science journals, but publishers know that if a shift was made worldwide to that model, many journals would be forced to cease publication: first, researchers in most fields do not have funds or enough funds to pay APCs for all their research outputs, which would have a drastic negative effect on journal content and revenue. Second, there are many paper types that are incredibly important for the journal audience but are not appropriate for charging an APC (reviews or editorials fall into this category) and therefore would not have their costs covered.
 - Reasonably priced APCs might allow more authors to publish but would not result in the same level of revenue as subscriptions so journals could not provide the same level of services under a Gold APC model (see our next point of concern). This would be especially detrimental to small niche journals, which would not have the economy of scale of large journals, and could have profound effects on the quality of scholarly publications over time.

As a not-for-profit publisher of 3 Gold OA journals we can confirm that it takes several years to make a surplus of any type using the Gold OA model; in fact, our own OA journals are still being subsidized by our subscription revenue. As long as OA is a threat to journals' existence, most journals and publishers will be forced to continue under their current business models and simply forego content from authors with Plan S Coalition funding.

With such strict restrictions on where authors can publish and the fact that legacy journals cannot be easily flipped to a Gold OA model, researchers in receipt of Plan S funding will have very few choices on where to publish, which is not only a contravention of academic freedom, but also an impediment to how communities use and rely on journals to find trusted and relevant content.





Jeopardizing Scholarly Communication Advancements and Trust in Scholarship

Information technology is a burgeoning field, full of promise, with advancements such as block chain and artificial intelligence. Online publishing will be a beneficiary of those discoveries and has, in fact, already been evolving to leverage benefits that did not exist in the journal print world. These updated features have greatly benefited the research community but they do increase ongoing publication costs. Our third issue with Plan S, therefore, is the effect that lower revenues due to an APC model will have on the future advancements in scholarly publishing. We say this as a not-for-profit publisher who does not need to pay shareholders. Our worry is that lower revenues will require us to limit the number and quality of services that we offer, which will impede our ability to meet the needs of our community. While large scale commercial publishers **may** have the capital to continue to offer these services and adopt new ones as they become available, smaller scale publishers, including society and not-for-profit publishers, will certainly struggle to keep pace, if they continue to exist at all.

Just some of the advancements in scholarly publishing that have arisen in the online arena and have required considerable investment from publishers include:

- Providing integrated and streamlined online platforms for submission and publication
- Adoption of DOIs and other CrossRef features that connect content and increase discoverability.
- Subscribing to and displaying article-level metrics, which provide information of interest to authors or connect them with people using their content.
- Adopting features like ORCID or CReDIT, which provide transparency to authorship and in the case of the former make publishing a more integrated and efficient experience for authors by allowing metadata to be shared between systems.
- Standardized XML, which facilitates communication between indexing systems or other important databases.
- Translation and mobilization of scientific knowledge, an increasingly important mechanism to bridge the communication gap between research specialists and lay audience or decision makers.

We welcome future advancements that will benefit the research community, but we do not look forward to a future where those innovations cannot be adopted because funder mandates cause our revenues to significantly decrease.

Moving from print to electronic has not saved money, but it has resulted in new opportunities. While many of these advancements are expensive to adopt and maintain, they offer tremendous





value to the scholarly community and we need to collectively ensure that they can be maintained long-term to support the scholarly communication ecosystem.

In addition to increased costs to support beneficial online features, costs are also increasing because the internet has unfortunately provided an environment conducive to ethical misconduct. In recent years it has become necessary for publishers to more regularly monitor for plagiarism and duplicate publication and in some cases take legal action so that we can preserve trust in the scholarly record.

And, finally, it goes without saying that having a team of highly skilled publishing staff is essential to maintaining the quality of scholarly publications, but this too comes at a considerable cost to publishers. In the case of CSP, our editorial office and copyediting staff are experienced subject matter experts that provide exceptional support for authors and help to ensure that we publish the best quality science. This in turn builds trust in our publications amongst the research community. We fear that, as a smaller scale publisher, the proposed changes could put our ability to maintain this level of service at risk, which could in turn jeopardize the reputation of quality that our journals have developed over decades of publishing.

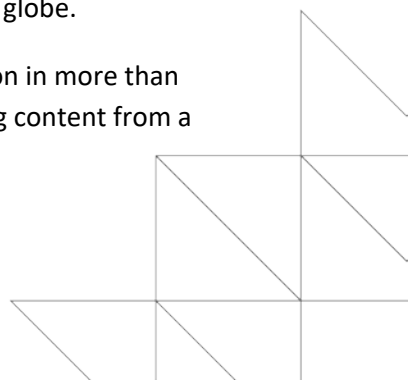
Conclusion

Publishing is an essential part of the research cycle and great care should be taken when introducing mandates that put that segment of the cycle in jeopardy. OA without sustainability is detrimental to research dissemination and scholarly advancement. Canadian Science Publishing believes in OA. As a not-for-profit publisher, we are happy to have our hybrid journals subsidize our OA journals but we would not be able to continue publishing at all if we switched all of our journals to OA in the current environment. OA is in need of a sustainable business model, and we, along with many others, are eagerly trying to find such a model. We believe OA sustainability is possible, but it will require all scholarly stakeholders to invest in it on an ongoing basis. The scholarly communication community requires a well thought out and thoroughly coordinated plan to allow us to move to full OA. Plan S lacks the elements required that will truly support full OA.

About CSP

Canadian Science Publishing (CSP) is Canada's independent, not-for-profit leader in mobilizing science-based knowledge, making it easy to discover, use, and share. As Canada's largest publisher of international scientific journals, we're committed to strengthening the integrity, relevance, reach, and impact of vital knowledge and research, across Canada and around the globe.

CSP currently owns and publishes 24 diverse international journals with distribution in more than 175 countries, and provides publishing services to an additional 15 titles. Featuring content from a





global community of researchers, our publications are supported by a team of internationally renowned subject-expert Editors and peer reviewers. Our journals cover fields across the spectrum of science and engineering, with a focus on fundamental and applied sciences. As a first mover in open access, interdisciplinary journals, we connect researchers from diverse fields, enabling them to contribute to solving key world challenges.

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