

Taylor & Francis Response to Plan S

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

We would welcome clarification on a number of areas including, but not limited to, the following:

- Compliant repositories, especially for non-medical research and at institutional level. At present, Europe PMC appears to be the only compliant repository for the green open access (OA) route, based on the criteria outlined in the implementation guidance;
- A definition of a transformative agreement;
- What exactly the 1 January 2020 deadline relates to;
- The communication and engagement plan and practical support on offer from cOAlition S to enable publishers, researchers and institutions to understand the practical implications of compliance.

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

In brief, we encourage the cOAlition to take the following steps, and offer support as needed:

- Stakeholder engagement, especially researchers;
- Advocacy and awareness raising with researchers and institutions. Over 85% of academic journal editor and learned society participants in recent Taylor & Francis webinars on the subject have indicated that there was little to no awareness of Plan S amongst their colleagues;
- To carry out impact and risk assessment and make public the outcomes from that exercise;
- To allow for a variety of licences on accepted manuscript – including non-commercial and non-derivative reuse variants that still permit text and data mining;
- To review the embargo question and work with publishers and academic librarians to test various scenarios;
- To revisit routes to open and consider a broader spectrum of openness that works for all subject disciplines. We would encourage the cOAlition to consider other options that currently exist or could be created to achieve their aims, acknowledging different approaches work better for different fields;
- To consider the risks to openness and distortion to competition arising from price controls in relation to article publishing charges (APCs);
- To draw up clear timelines for implementation, including outreach and communication plans to researchers.

Taylor & Francis Group – Feedback on the Guidance on the Implementation of Plan S

8th February 2019

Introduction

Taylor & Francis Group is a European publisher serving international markets. Headquartered in Oxfordshire, we operate from 18 countries worldwide. We work with scholarly societies, funders, researchers and institutions globally and across all disciplines.

This gives us a unique viewpoint on the different ways in which scholarly communication is funded. The world is progressing towards Open Access at different speeds, and with different approaches. Europe leads in APC-based Open Access, but other parts of the world are forging a path linked to subscription and green deposit, or are not engaging at all. In this context, publishers are not able to implement a single model of funding, which is what Plan S requests, when the market realities are that producer (APC Open Access) and consumer (subscription) funded publishing still co-exist. Hybrid journals are fundamental in offering researchers a choice of publishing model in their preferred venue. It is an impossible task to have over 2,000 of our journals satisfy the criteria outlined in Plan S within the timeframes that the Plan envisages without damaging either the titles or the communities they represent.

It is from this position that we have approached this feedback. We believe a considered and well-planned transition is crucial in allowing Open Access to flourish. Failing to do so could cause permanent and unintended damage to research communication, risking the rigorous approach to publishing that is the foundation of trusted journals.

Taylor & Francis supports Open Access and a wider Open Research agenda

- We offer authors choice: 95% of Taylor & Francis journals offer an APC Open Access (OA) option; 280 are fully OA with no subscription content; the rest are hybrid journals in which open access content is published in addition to the content subscribers pay for. We do not charge twice for content.
- APC OA continues to grow as a share of the 130,000 articles we publish annually. In 2012, Gold OA made up c.1% of UK content published in Taylor & Francis' journals; in 2017 it was over 13%.
- We are also progressing with a broader Open Scholarship agenda, covering researcher advocacy, data sharing policies and promoting open standards such as Open Science badges.
- All Taylor & Francis journals allow authors to archive earlier versions of their work, as well as enabling authors to deposit accepted manuscripts (Green OA). Green OA is entirely reliant on the investment that sustains journals and is therefore embargoed in most disciplines.
- We have been at the forefront of the transition to Open Access and Open Scholarship for over a decade and will continue to invest to have a key role in driving this transition. We have developed OA workflows and services, and have also created, converted and strategically acquired OA journals and publishers. Our colleagues have been proactive members of the Open Access Scholarly Publishers Association and initiatives such as i4OC, which champions open citations.

- We are committed to going further, faster: our objective is to optimise the dissemination and impact of quality research.

Practical Concerns with Plan S

We are concerned that Plan S was created without risk assessment or input from key stakeholder groups who are essential to its implementation and success. Whilst the Guidance on Implementation gives welcome practical indicators on how the cOAlition would like to see the Plan implemented, it does not address its inherent issues:

Proscribing hybrid journals would be detrimental to research:

- Producer (OA) and consumer (subscription)-funded research needs to co-exist because that is the reality of how global research is currently funded. Banning hybrid journals in this context is not practical when other parts of the world still advocate different approaches to OA.
- Researchers require choice to publish in venues that will most effectively showcase their work, under the model of publication that they choose: an APC model for those that are funded in this way; a subscription model for those that do not have funding for publication charges. Non-compliance of hybrid journals would bar researchers from publishing in >85% of journals, including many of the most prestigious titles, which serve as the voice of their communities.
- The implication of this approach is that cOAlition-S funded researchers may be left without a suitable journal for their work.

European researchers' ability to collaborate internationally would be undermined:

- The need to access articles via a subscription will not disappear within the timeframe the Plan proposes. If subscription budgets are diverted to pay APCs, researchers in cOAlition S countries will likely lose access to international research. This either creates a funding gap that public sources would need to fill to avoid loss of access, or creates a barrier for researchers to key literature in their fields.
- Research is a collaborative and global endeavour. European researchers will find it harder to collaborate with overseas colleagues if there is little chance their eventual research papers will be published in the best journals in their fields.
- Overall this could negatively impact the excellence and standing of European research.

The plan neglects disciplines that receive less funding and independent, unfunded researchers:

- In particular, Humanities and Social Sciences get much less public funding, while higher article rejection rates push up publishing costs. Under Plan S, journals in such fields could cease to be viable leaving researchers with fewer venues to publish their research.
- The plan risks creating a barrier to entry for unfunded researchers, immediately, in the countries whose funders have signed up to the Plan, but globally if it is carried out to its conclusion.
- Other routes to Open Access exist for fields with less funding, particularly Green OA. However, Green OA, as outlined in the implementation guidance, is only acceptable to the cOAlition without embargo. Publishers cannot produce and underwrite articles that do not have funding, and an embargo is fundamental to allow time to realise these inherent costs.
- Green and APC OA are only acceptable to the cOAlition with a CC BY license, which many researchers in the Social Sciences and Humanities find problematic. In surveys, our authors



tell us this license is the least preferred due to concerns about lack of control and about material being misinterpreted when reused.

Unnecessary regulation and restriction of the market is inimical to competition and may damage the independent role of the publisher:

- Plan S proposes capping APCs as a temporary measure until the market stabilises. Price controls are often ineffective and counter-productive with businesses all clustering at the cap rather than competing. Even when intended as temporary, once set, price caps are also very difficult to remove. A key example of this is the situation in UK universities, where tuition fees have clustered at the price cap.
- Regulation has potential to create an inherent conflict of interest between political and governmental aims and research. At present, research publishing is largely protected from political interference due to the independent nature of the industry. This independent voice is critical in ensuring the integrity of research and retaining trust in scholarly communication.

A way forward

We would like the cOAlition and its individual members to consider:

The creation of a cross-stakeholder advisory board. We would like to help the cOAlition consider the perspectives of different stakeholders. The importance of this approach has enabled the Finch Report to meet many of its objectives in the UK, as highlighted by a recent report by Professor Adam Tickell, which advocates for continued engagement between all parties as it has so far placed the UK firmly on track “for publishing all scientific outputs via open access by 2020”¹.

Choice for researchers. We believe that being more flexible in ways to achieve openness will help to achieve the cOAlition’s goals around the dissemination and impact of research more swiftly. The routes to OA that Plan S proposes do not meet the needs of independent and underfunded researchers in particular. They also ignore the preferences of researchers in certain fields around licensing, particularly in the Social Sciences & Humanities. They risk putting European researchers at a significant disadvantage by putting up barriers to readership and collaboration.

Rejection of price controls and regulation. We would like an evidence-based independent impact assessment to be conducted around price controls and regulation as we believe both pose risk to the market and the wider value publishers provide.

A more realistic timeline and recognition that subscription titles will retain a place in the global research system while the rest of the world demands them. During a period of global transition, European researchers should not be prevented from showcasing their work alongside international counterparts.

¹ Professor Adam Tickell (2018) *Open access to research publications – 2018*. Retrieved from https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/774956/Open-access-to-research-publications-2018.pdf