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Feedback on the Implementation of Plan S

Wiley is a global leader in research and education. In research, our mission is simple: empower researchers to communicate great research, enable societies to do great publishing, and promote the dissemination of knowledge as widely as possible. For over 210 years, Wiley has been helping people and organizations develop the skills and knowledge they need to succeed. We appreciate this opportunity to respond to the recently published guidance to implement Plan S.

We are proud to be a leader in open access. Over 90% of Wiley-published journals enable immediate open access, including through 100+ fully open access journals and 1400+ hybrid journals. In 2018, we published more than 22,000 open access articles in those publications. In addition, many of the manuscripts we accept are made freely available under green open access policies. We are also excited to have entered into transformative agreements that have the potential to accelerate progress towards open access. As announced this January, we were the first publisher to reach a groundbreaking agreement with Projekt DEAL that will allow authors at more than 700 academic institutions in Germany to publish approximately 10,000 articles per year open access in Wiley's journals. Most importantly, this partnership shows a close alignment between the longer-term aspirations of Projekt DEAL and Wiley: it includes working together to launch a new flagship open access journal; to establish an open science and author services development group focused on innovating new publishing approaches; and to create and host a new annual symposium for early-career German researchers, surfacing cutting-edge ideas on the future of research communications. We aren't afraid to take chances, to experiment, and to innovate to help our customers reach their goals.

These achievements would not be possible without our nearly 800+ publishing partners – including non-profit societies, associations and organizations – who push us to be more innovative and serve as invaluable collaborators in advancing open science. They would not be possible without the thousands of researchers and hundreds of Nobel Laureates who put their trust in us to help communicate their discoveries. We are grateful for their partnership and are firmly committed to challenging ourselves to do better to meet their needs and make science more open.

We welcome the interest that Plan S has spurred in scholarly publishing. The work of supporting researchers to advance discovery and spread knowledge could not be more important. As we look to the future, we are committed to working in good faith with stakeholders across the research ecosystem to make scholarly publishing more innovative and open. We appreciate that cOAlition S has asked for feedback on its initial ideas. We do not believe there is a single perfect model or pathway to open access. But we do believe several basic principles can help guide discussions with funders and the broader research ecosystem:

Researchers must be our North Star. They are driving innovation and discovery. Continuing to provide and develop new ways for researchers to share and consume research articles and information, while also protecting the integrity of the scholarly record, must be at the heart of what we do. We should not build new walls to publication or cross-border collaboration, we

should not treat core values such as author choice as roadblocks to progress, we should not mandate publication in outlets that do not yet exist or eliminate licensing choices. Current guidance from Plan S excludes most journals – due to overly restrictive requirements or simple prohibitions. In doing so, it puts at risk the quality and vibrancy of the research ecosystem and raises fundamental questions as to whether we are truly serving the needs of the research community. Ultimately, Wiley is convinced we need to work with, not against, the communities we serve to best deliver on the stated goals of Plan S.

Diversity is a strength, not a weakness. Gold open access journals can play a role in promoting accessibility. We have launched over a hundred and are keen to develop more including in collaboration with our society partners. But they are just one pathway to open access: hybrid publications have enabled many authors to publish open access for the first time while enabling them to publish alongside their established, global communities responding to different policy drivers; diverse licensing options give authors choices on how to share their works openly; green open access policies, when designed sustainably with appropriate embargo periods, have led to countless papers being made accessible without cost to readers. Recognizing the potential financial tensions and stresses of certain models, transformative agreements offer a new opportunity to meet the evolving needs of some customers. These routes to delivering open access have developed because every author, institution, community and geography has its own interests and needs. The many pathways to open access and variety of publishing business models reflect the diversity of this global research community that we all serve. And they ensure that any researcher, no matter where they live or what their position or funding status, has the opportunity to publish in the journals they consider most the best fit for their own work. We are committed to using all the models available to maximize opportunities for authors and advance open research. We believe that all funders should share this commitment and develop and implement policies accordingly.

Sustainability isn't just a buzzword. It is what allows our hundreds of society partners – and thousands of other societies around the world – to support invaluable programs and activities in their research communities. It is what allows our thousands of employees worldwide to provide the highest-quality publishing options to researchers and to continually invest in new journals, tools and innovations. It is why thousands of high-quality journals, each serving a unique community of authors and readers, exist in the first place. Wiley's long-term sustainability right now is enabling us to make the significant investments necessary to tailor our services to the specific needs of funders and institutions who seek a transition to open access via transformative deals. But it is unclear why policymakers would consider policies or price controls that would jeopardize today's vibrant and sustainable ecosystem and put at risk the long-term sustainability and quality of scholarly publishing in the first place. Our mission is to serve researchers: we must draw a bright line to ensure that under no circumstances will the quality of the works we publish and the valuable services that journals and societies provide to communities to be compromised. We hope governments and funders will support us in this effort.

It Takes a Village. We believe that there is an opportunity to shape the way in which research is published and accessed for the benefit of the research community. Strong partnerships are vital

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in driving this evolution towards the broader goals of a future of open science. Wiley wants to continue to invest in new publishing and technology ventures that create new opportunities for researchers. The new open science and author services development group with Projekt DEAL is just the latest milestone. As early as 2011 Wiley was one of the first publishers to work with research communities to require data sharing as a condition of publication in substantial parts of our life sciences program. Publishers together with societies, libraries, universities, funders and other stakeholders across the research ecosystem have essential roles to play in supporting scholarship and open science. Collaborative efforts can chart a way forward in which we work together and not at cross-purposes. We're ready to roll up our sleeves and get to work.