

A commentary from the British Academy on ‘Guidance on the Implementation of Plan S’

February 2019

The British Academy has already, in November 2018, commented on the initial principles set out in Plan S by Science Europe. In that statement, we begin with our firm commitment to open access (OA). Our own Journal is published as OA, with no article processing charges (APCs) for contributors. We continue to believe many of the principles set out in Plan S are admirable as a direction of travel, and we fully support them. In its entirety, that statement remains the basis of our position, and is attached for convenience in Appendix 1.

However, we were then and we are now concerned about some implications of the plan. These concerns remain even after Guidance for Implementation has been issued by cOAlition S (that is to say the collectivity of supporters of Plan S),¹ and a number of new responses, both to the original plan and to the guidelines, have emerged. Though there is clearly considerable momentum behind Plan S and, significantly, China has recently expressed interest, there are also signs that some funding bodies have important reservations. It appears that the DfG, one of Europe's largest funders, will not sign up; some private funders in the USA are interested, but public funders are less so. These developments, taken as a whole, have made the implementation of the plan more difficult to envisage; and they certainly do not invalidate our original concerns – in some respects, they exacerbate them. We nonetheless welcome the fact that the Guidance relates only to journals, and that cOAlition S has recognised that monographs, and other forms of scientific publication such as edited collections, are different and will require subsequent and extended consideration.

Here, then, to avoid repetition, we focus on six main issues. We should add that we are aware that, in the United Kingdom, UKRI is currently conducting its own review into open access, including how the principles of Plan S might be implemented in practice. We are also aware that different members of cOAlition S may diverge in their application of the scheme, as indeed the Guidance implies.

1. Equality and diversity

It is not clear to us whether Science Europe, or any of the members of cOAlition S, have undertaken any kind of equalities audit related to Plan S. This should be a first step before a major change of this kind can be contemplated, and indeed in the UK it has been a statutory requirement since 2010. At this stage we are particularly concerned about one clearly defined group of potentially disadvantaged individuals, Early Career Researchers (ECRs) – which is also a group in which women and BME researchers, both protected categories under UK law, are more numerous. If cOAlition S is successful in its stated aim, to create an environment in which all research is entirely open from the start, in non-hybrid and APC-funded journals, where will ECRs, who in many cases do not have a permanent position, frequently move employment, and will not have

¹ Available via <https://www.coalition-s.org/feedback/> (the initial Plan S is at <https://www.coalition-s.org/10-principles/>). All cited websites were accessed on 14 January 2019.

easy access to funds unless they are established members of grant-funded research teams, be able to publish? Plan S's plans to require compliant journals to reduce – preferably cancel – their APC fees for members of low- and medium-income nations are admirable, but we believe that they also need to consider the effect of the plan on low- and medium-income researchers in Europe. If they do not do that, Plan S will exclude exactly the cohort which needs to be part of the project from the outset, for they will carry it into the future. In a similar way we urge that the situation of researchers in the UK who are retired, or otherwise not employed in university posts, should be taken into consideration in the final implementation.

2. Hybrid journals

We should say, at the outset, that we are strongly supportive of the determination to end the practice by which publishers may take APCs for some articles while still charging the same level of subscriptions, that is to say 'double dipping', which hits both funding bodies and universities. We hope that clear and transparent rules will be drawn up which prevent this.

However, in our initial response, we set out our concerns about Plan S's antipathy to hybrid journals and these concerns are not allayed by the new Guidance. There, cOAlition S proposes that hybrid journals are to be considered acceptable if they are prepared to sign transformative agreements to flip to publishing only Gold OA after three years. This is a concession only over timing, not substance, so our initial critique still remains valid. But there are additional points which need to be made here.

Currently, journals are overwhelmingly hybrid. A recent estimate puts the percentage of journals which are not Gold-only at 86% across all disciplines, with no significant variations across the whole sector from Humanities to Medicine; since almost none of these 86% refuse to accept APCs, they are effectively all hybrid.² In Humanities, our estimate is that, as a maximum, some 15% of articles published in major journals are funded by actual or potential Plan S members; in the Social Sciences it might be 20%. ('Major' is not an exact term, but the percentages will almost certainly be lower for less well-known journals.) These are so far informed estimates; research is currently being carried out to produce more robust figures. But the more detailed investigation into UK History journals carried out very recently by the Royal Historical Society confirms this picture, and indeed strengthens it. Their figures show an average of 8% of journal articles being published on the basis of funding by cOAlition S members, even though these include UKRI, the main public research funder in the UK, which would mean that the figures should be

² Information from *At the crossroads of open access to research: An assessment of the possible consequences of Plan S for publishing, research quality and research environments* (November 2018)
<https://www.prio.org/utility/DownloadFile.ashx?id=1667&type=publicationfile>

higher than they would be for journals in, in particular, Germany and the USA.³ This work will be tested on other disciplines in the near future; but, unless this one discipline is radically out of line with others, our estimate of 15-20% should be seen as very much a maximum figure. In most Humanities and Social Science (HSS) disciplines most research is not funded by grants, so researchers do not normally have access to the funds necessary to pay Gold APCs.

What this means in terms of responses to Plan S is therefore quite simple. If hybrid journals are judged to be non-compliant, then cOAlition S funded researchers will not be allowed to offer their articles to journals that allow Gold options for authors but also rely on subscriptions. Journals will therefore have to make a choice about their future. But no journal with only 8% of its articles funded by cOAlition S member organisations, that is to say the History figure, will volunteer to flip to Gold OA only, for it would risk losing 92% of its regular contributors. Indeed, it would not be able to afford to, for the costs of handling articles and their refereeing, and then their editing, would be unworkable if the journal were to abandon subscriptions and switch to APC funding only. Indeed, these costs would be unrealistic at 20% of articles coming from grants providing APCs. In this situation, we predict that most of the 86% of HSS journals, which are not Gold OA only, will cease to be hybrid, at least in that they will not be able to publish articles funded by cOAlition S.

We believe that cOAlition S's hostility to all forms of hybridity will have precisely the opposite result to its stated intentions. Anecdotally, we are aware of journals which have privately made the decision already to withdraw, if necessary, from publishing articles funded by cOAlition S. The smaller percentage of journals which will not wish to go down this route, perhaps because the best articles in their field are externally funded, will hit financial crisis at once, and may well not survive. (Many STEM journals will face a similar funding crisis. It may here be noted that mirror journals – far commoner in STEM than HSS – can have the advantage of transparency.)

This is not a plea for tradition for tradition's sake, nor for the viability of the learned societies whose financial models often depend on these journals. We are fully in sympathy with the latter, but that is not the issue we are focusing on here. The point is a practical one. Both of these likely results, the rejection of cOAlition S-funded articles and journals facing severe financial difficulties, are unwelcome outcomes. They will neither increase the international availability of scientific knowledge nor make it easier for Plan S to be achieved. And we cannot see that other outcomes are possible, in HSS and, indeed, some way beyond its boundaries.

³ *Plan S and UK Learned Societies: The View from History* (Interim Report, 14 January 2019) <https://5hm1h4aktue2uejbs1hsqt31-wpengine.netdna-ssl.com/wp-content/uploads/2019/01/RHSPlanSInterimJan19.pdf>

3. Platforms

What all this means, is that cOAlition S's desire to see a new publishing landscape will depend on its own ability to set up new peer-reviewed publishing platforms which can replace most of the 86% of hybrid journals – and do so by 1 January 2020, its planned start date. These new platforms will need to have the reputability, and the experienced editorial boards, which are essential to fill the very large gap left by the journals which have not chosen – presumably because they will be unable – to flip to Gold-only. This is indeed a requirement of cOAlition S's guidance notes, which say 'The journal/platform must have a solid system in place for review according to the standards within the relevant discipline, and according to the standards of the Committee on Publication Ethics'. Such editorial boards would need to have members able to cope with a wide variety of scientific languages, as we emphasised in our initial commentary, since HSS disciplines by no means publish only in English. That was already a difficult task when Plan S first appeared in September 2018; four months later, unless plans are further advanced than we know, it will be even more difficult.

There are therefore issues of practicality here, too. One possible outcome is, of course, that a range of new platforms and repositories will be created to receive articles which are funded by cOAlition S, leaving other scientific research to be published as at present. In some disciplines, these platforms might indeed come to be seen as more attractive locales for publishing than traditional journals. But in others they would not, and it is our view that in most HSS disciplines they risk not having the ability to attract, foster and hone excellent scholarship which is possessed by all the major journals in the current publishing landscape. We do not think that a good eventual result would be that cOAlition S-funded work was stuck in second-rank publishing venues, and we are sure that cOAlition S would agree; but we are less sanguine than the coalition appears to be on this point.

4. Complexity

We are also concerned that the spelling out of the conditions which such platforms, or other repositories, will have to meet – full text stored in XML in JATS standard, digital preservation programmes such as CLOCKSS – will make them that much harder to set up. Almost no repositories have these features at present. Many fully-OA journals already in existence would not be compliant under these conditions. To introduce repositories or platforms with these features will be expensive, and a long-term commitment, and it is not obvious who would provide the necessary funding.

5. CC BY

Our initial commentary raised this issue, so we can be brief here; HSS researchers remain unconvinced that CC BY 4.0 safeguards their research, and they overwhelmingly prefer the protections afforded by CC BY-ND. The

Guidance does not represent an advance on the original Plan S, except to say 'CC BY 4.0 demands that licensees indicate if changes are made when re-using licensed material, and this means that the CC BY-ND license should not be necessary for due protection of the rights of the author'. CC BY 4.0 does indeed say this, but does not require any statement as to which changes are made, which HSS academics see as crucial. The HSS community is concerned that unspecified changes to text can undermine, even corrupt, the arguments of authors, and will not be convinced by cOAlition S's assurances to the contrary. This will undermine any buy-in for Plan S across the HSS community, which is around half the sector.

6. The danger of insularity

After an initial wave of enthusiastic supporters for Plan S, the ranks of cOAlition S have not been swelled by many other members. Many who do support it are also not the principal research funders in the countries concerned, as for example in Sweden and Italy. This may change, but, as already noted, we know that funders in Germany and the USA appear more reluctant.

There is a clear threat here to international collaborations and partnerships if publication of findings were to be restricted to a small number of journals which were not the leaders in their fields. What we do not want to see is any kind of division between member countries and non-member countries. The sharp requirements of Plan S risk creating that division all by themselves, if they remain unchanged. We are committed to a full international availability and exchange of knowledge, without borders. That for us is more important than articles being fully OA instantly rather than after 12 months, which usually means after payments of APCs. We see real danger if the rules of Plan S apply only to some countries and not to others.

There is also a clear risk that, in spite of the vague promises about APC fee waivers, one unintended consequence of the implementation of Plan S will be to prevent publication in leading journals by scholars in the Global South and, to a lesser extent, in the Middle East and Asia. This would seem to us to be directly contrary to the laudable intentions of the initiative.

Conclusion

The British Academy supports many of the aims expressed in Plan S. We have put forward our criticisms here in the hope that cOAlition S will rethink some of the rigid details of its planned requirements. We argue that many of these will not work in their present form for HSS researchers in particular, and that they risk creating a research landscape which is actually farther away from the stated aims of cOAlition S, rather than closer.

In our view, if cOAlition S abandoned its hostility to hybrid journals, and allowed grant-funded articles to continue to be submitted to them, much of the

opposition to and tension concerning Plan S could soon fade away. As a result, cOAlition S might actually bring about more open access for more researchers during the next five-year period than under its present plans.

For the HSS community in particular, we would add that cOAlition S's opposition to CC BY-ND also seems to us an unnecessary obstacle to acceptance of the basic aims of the plan.

The issue of the licence and that of hybrid journals are two major changes which we would seek in Plan S; a third is that far more care should be taken to protect the interests of ECRs. We warmly recommend these issues within the framework of the 2019 consultation over its implementation.

For further information, contact:
James Rivington
j.rivington@thebritishacademy.ac.uk

Science Europe's Plan S: making it work for all researchers

A commentary by
the British Academy

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Science Europe on 4 September 2018 published 'Plan S', a set of ten principles which are aimed at 'accelerating the transition to full and immediate Open Access to scientific publications' – explicitly including Humanities and Social Science (HSS) in its definition of science.¹ The ten principles are in addition to, and develop, Plan S's basic principle, which is:

'After 1 January 2020 scientific publications on the results from research funded by public grants provided by national and European research councils and funding bodies, must be published in compliant Open Access Journals or on compliant Open Access Platforms.'

This set of principles has already been endorsed by more than ten European research funders, including UKRI – the body which oversees the UK Research Councils, and Research England, successor to HEFCE (Scotland, Northern Ireland and Wales have separate funding councils). Plan S has also recently been welcomed by the Wellcome Trust and the Gates Foundation.

The British Academy is firmly committed to Open Access (OA), as we have stated on numerous occasions. Our own Journal is published as OA, with no author charges. Many of the principles set out in Plan S are admirable as a direction of travel, and we fully support them. One particularly important element of the plan is the intention to cap OA 'Gold' publication fees,² and the commitment that neither individual researchers nor universities with limited access to OA funds should have to pay them. David Sweeney, executive chairman of Research England, who has been named as one of the lead developers of Plan S, has stated that he is a strong proponent of 'Green' OA, which involves no fees to publishers, and some of the players in Science Europe have endorsed this as a possibility.³ Plan S also recognises, importantly, that open archives and repositories need to have a long-term archiving and curation function for the initiative to succeed.

The British Academy is, however, concerned about some implications of the plan, which we believe remain to be fully thought through. We comment on some of the Plan S bullet-points, in turn, in what follows. These comments are aimed at removing ambiguities and other problems, and concentrate on issues which are particularly important for HSS researchers, operating as they do in a different publication environment to that of most STEM disciplines. We believe that, with these ambiguities resolved, Plan S will have significantly more chance of working satisfactorily.

- **'All publications must be published under an open license, preferably the Creative Commons Attribution Licence CC BY.'** All surveys of HSS academics indicate a substantial majority who will insist on the inclusion of a 'No Derivatives' (ND) element in the licence for any OA publication. The Academy thinks their concerns are fully justified, and has set out its reasons elsewhere.⁴ Plan S, clearly, is not mandating any particular licence here, but

¹ www.scienceeurope.org/coalition-s/ provides links to the '10 principles of Plan S' and to a 'Preamble by Marc Schiltz, President of Science Europe'.

² Gold open access refers to work that is immediately available free to the user at the point of publication, usually after the payment of a charge by (or on behalf of) the author, which is sometimes substantial. Green open access refers to work that is available in a pre-publication format in a repository after an embargo period, with no payment.

³ *Research Professional* article, 2 October 2018.

⁴ 'Open access and monographs: Where are we now?' A position paper by the British Academy, May 2018, at www.thebritishacademy.ac.uk/publications/open-access-monographs-where-are-we-now

it will be important for planners to take account of the concerns of HSS academics.

- **'In case such high quality Open Access journals or platforms do not yet exist, the Funders will, in a coordinated way, provide incentives to establish and support them when appropriate; support will also be provided for Open Access infrastructures where necessary.'** It is generally recognised that in HSS such journals and platforms are few in number, and have little profile. For them to be ready and academically respectable, with proper peer review, in 15 months, across the whole of Europe with some thirty academic languages and numerous disciplinary fields, seems highly unlikely. Such journals and platforms would also have to be able to assure the sector that they are sustainable in the long term; it would do vast damage to science in general and OA in particular if any of them were to fail. There is a further, serious, danger that, in trying to end perceived monopolies on publishing by individual firms, we will open the door to monopolistic platforms, with uncontrollable publishing protocols. The dangers here are very well set out in a statement on Plan S by eight of Europe's Young Academies.⁵
- **'[I]t is understood that the timeline to achieve Open Access for monographs and books may be longer than 1 January 2020.'** We welcome this recognition, not least because such a high percentage of quality research in HSS is published in monograph form. We have however warned in a previous public comment that even to contemplate a timeline beginning in the early 2020s is far too short, given the virtual absence of large-scale providers, or engagement by the sector.⁶ It is not the case that the path to OA monographs is identical to that for articles, just slower; the way publishing works in each case is very different. This is something that will require not only a much longer timescale, but also wide consultation, to achieve a realistic and, above all, workable set of proposals. The British Academy is keen to play a full part in such consultation.
- **'The 'hybrid' model of publishing is not compliant with the above principles.'** We cannot agree with this statement. In HSS, nearly all reputable journals are hybrid, in that they publish articles not supported by funders, for which libraries or private individuals pay subscriptions, at the same time as making possible the publication of Gold OA articles. We cannot accept that attempting to abolish them all would contribute positively to the successful dissemination of scientific research. Nor do we believe that preventing researchers from publishing in the journals which they believe to be the most appropriate is an ethically sustainable position: indeed, paradoxically, the Preamble recognises the need to give 'a maximum of freedom' here. Given, as we have already pointed out, the shortage of fully OA journals in HSS, and the current lack of the resources to bring them into existence, we urge Science Europe to recognise that hybrid journals, far from representing a threat to the full implementation of OA, are themselves essential for extending OA in these disciplines. We would further emphasise that, when funder-supported articles in subscription-based journals are made available through Green OA, there is no danger of double payment for that content.

⁵ <https://globalyoungacademy.net/wp-content/uploads/2018/10/YA-Statement-on-Plan-S-FINAL.pdf>

⁶ 'Open access and monographs: Where are we now?'

The Preamble to Plan S fills out some of the thinking that the principles of the plan are based on. Some of it reveals what we believe to be misconceptions. It states that 'The subscription-based model of scientific publishing emerged at a certain point in the history of science, when research papers needed extensive typesetting, layout design, printing ... While moving from print to digital, the publishing process still needs services, but the distribution channels have been completely transformed. There is no valid reason to maintain any kind of subscription-based business model for scientific publishing in the digital world.' This does not at all describe the situation in HSS, where publishers (which include independent journals and journals published by learned societies, which wish to maintain high standards) perform essential editing services. The Preamble goes on to say that 'Publishers should provide services that help scientists to review, edit, disseminate, and interlink their work and they may charge fair value for these services in a transparent way.' We entirely agree; but, given the realities of HSS publishing, in our view these services are by no means minor.

Behind this is what is in effect another principle: 'Monetising the access to new and existing research results is profoundly at odds with the ethos of science.' If this is an attack on excessive profits, we are wholly in agreement. But publishing with a proper sense of responsibility to the needs of science (including peer review, data-checking, and clarity in layout as well as editing) is not, and cannot be, free. Any future protocols for OA in HSS, and doubtless in STEM and Medicine, must recognise this fact, which is independent of the possibilities of the digital world.

We are, finally, concerned that Science Europe's belief that OA must be immediate, without allowance for any type of embargo period, is not justified in the text. It comes across as surprisingly dogmatic, and contrasts with the tone of the rest of the document.

We welcome Research England's statement⁷ that it wishes to talk to stakeholder groups about the practical implications of Plan S, and we are very keen to be part of all the discussions which will be necessary.

For further information, contact:
James Rivington
j.rivington@thebritishacademy.ac.uk

⁷ David Sweeney quoted in *THE*, 5 September 2018.