

EMBO feedback on Plan S implementation guidance

8 February 2019

This document is a representation of the feedback EMBO provided on the Plan S implementation guidance on <https://www.coalition-s.org/feedback/>.

EMBO supports the concept of universal OA and believes it is achievable. We strongly support the principles and much of the detail behind the proposed implementation of Plan S: author copyright retention, the CC-BY requirement, the guidelines encouraging the adoption of DORA and COPE principles, transparent costing, and pricing as a quality criterion are areas that EMBO agrees are and will be important, especially as part of the realization of Open Science.

cOAlition S asked for feedback to two questions, the answers to which are listed below.

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

What exactly is a transformative agreement? A publisher needing to execute an agreement with each individual funder is not viable, so who would be the lead parties to such an agreement? What level of detail does such an agreement need to include? Will these agreements be legal documents with clear penalties for non-compliance? PlanS suggests financial assistance for transitions, but without concrete details, journals cannot take this into account.

Hybrid. What is intended for transitioning away from hybrid may be implicit in the implementation language, but this needs to be made explicit. First, what is the timeline? Does the 'grace period' end at the presumptive date of the completion of transformative agreements or how long after?

The implementation is not explicit regarding the situation with hybrid journals after the transformative period. It will be critical to state explicitly whether Plan S funders will prohibit their grantees from publishing in any hybrid (or subscription only) journal even if the funder does not pay the APC for that publication, and whether or not there is simultaneous deposition to a repository, or whether hybrid publication is allowed, but does not afford Plan S financial support.

Compliance and quality control. How will compliance to Plan S requirements be screened? In particular: are funders free to interpret these requirements individually? Will DOAJ listing be the only quality control required to qualify a journal, in principle, for Plan S support? If so, will there be detailed requirements agreed to avoid including low quality/value-added journals?

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

We would like to see consideration of a system where Plan S funders would deposit their funds for publishing with a central agency; journals could then apply to this agency to be approved according to their transparent quality attributes. Once a journal is approved, any grantee of a Plan S funder would then draw funds from the agency to publish in that journal.

We also want to emphasize that we assume the aim of Plan S is to achieve high quality OA, and not, in the first instance, to save money or to be restrictive. Different sectors have different costs, and different funding mechanisms; we would like to see a much more detailed and extensive discussion and, if needed, policy analysis.

In addition, EMBO highlighted several points beyond those captured in the feedback form as part of these two questions:

- 1) **Selectivity and cost caps.** Selection of articles for value to a particular community, interest or excellence directly serves research and society by identifying and highlighting areas of discovery, pointing towards applications, and supporting innovative thinking. Most importantly, journals focused on selectivity (this includes all EMBO Press journals) highlight discovery or novelty; in other words, a fundamental observation. This is a crucial and irreplaceable component of the scientific process.

Although not all journals are selective in this way, it is of utmost importance that Plan S recognizes the value and importance of selectivity and supports high quality publishing across the spectrum. Selectivity and quality maintenance have substantial monetary costs attached. These rise with the level of selectivity. Plan S refers to the possibility of real costs being acceptable as long as they are transparent. It will be critical to define precisely what are seen as real costs. What sort of editorial processes will be considered acceptable? What human resources costs might be included?

The imposition of APC caps has been discussed in the context of Plan S. An arbitrary cap could never be set fairly for authors, as there are different costs and funding levels across sectors, institutions, countries, etc. In short, the problem with the use of caps is not about money per se but about a researcher's access to the journals of choice.

If caps will not be imposed as part of Plan S, this must be stated explicitly. The imposition of arbitrary (and presumably relatively low) caps would risk eliminating selective journals in favour of low cost, low selectivity, low value-added journals.

- 2) **Binary nature of the switch to Open Access.** "Transformation" for journals is an irreversible and all-or-none decision. If the decision to 'flip' a journal to OA is made under a certain set of conditions, those journals cannot turn back after policy discussions have concluded in months or years with a different set of conditions. For Plan S to be successful, it is of utmost importance that discussions about which conditions are necessary to make Plan S successful, and subsequently the timelines that will be imposed, are 100% decided prior to any other directive that journals must flip to OA.
- 3) **Community values.** An EMBO community questionnaire (January 2019) with 163 respondents showed that it was acceptable and expected for societies or not-for-profit organizations to charge an average of 28% (median 20%) on top of real costs in order to maintain community-oriented services and activities. There is no simple way to replace these revenues.

It has, for example, been suggested that societies simply need to charge more for conferences. But journal revenues often subsidize those conferences. Also note that any hypothetical conference income would in any case amount to cross-financing of community organizations by research funders. If it were the case that societies could somehow have access to the savings from the premium on the APC (i.e., from funders) that could be a successful model, assuming mechanisms for assuring the independence of the society were in place.