Plan S Consultation Response from the Society Publishers' Coalition

The not-for-profit learned societies, membership charities and community publishers represented by this letter all publish journals as part of our charitable missions, collectively publishing over 17,000 articles in 2018. Our author base is truly global and we share a belief that authors must be able to publish in our journals regardless of their funding status or ability to pay.

Our position

We support the principles of open scholarship and believe that open access to research outputs will benefit researchers across our shared communities. We also believe that authors should retain copyright in their works with no restrictions, and that open access publication fees should be paid by funders or institutions, not by individual researchers. Ability to pay should not be linked to ability to publish. We support the San Francisco Declaration on Research Assessment (DORA) as a driver to improve research assessment by evaluating the work itself, rather than using the venue of publication as a proxy for quality. We recognise the importance of open archives and repositories, such as preprint servers, for hosting research outputs, which we see as a fee-free complement to open access in journals.

Despite having these principles and ambitions in common with Plan S, we have concerns about the Plan, as it is currently written, and have detailed these below. As a group of societies that publish journals, we share a common aim of transitioning to open access in a sustainable way, and we seek to engage with funders, institutions and consortia to find a way forward within the spirit of the Plan's principles; to this end, we have also included some suggestions of how cOAlition S can help to ensure that a transition is potentially achievable.

Our concerns

Plan S explicitly refuses to fund APCs in 'hybrid' journals. While we acknowledge the frustration funders and universities have expressed regarding the perceived slow progress towards universal open access, an outright ban on the hybrid model is a source of concern for this group. Many of our journals operate on the hybrid model, and removing funding from hybrid will reduce our ability to flip these journals to open access. It will also cause real damage to us as society publishers and thereby to our communities, while creating new commercial advantages for very large publishers who can capitalise on their scale.

Hybrid publishing is a transitional model from subscription to open access publishing, predicated on funder, community and institutional support. As more funders mandate immediate open access of the version of record, and as more scholars and institutions select and support open access for published outputs, hybrid journals publish fewer subscription articles and eventually reach a tipping point where a flip to pure open access becomes viable. The pace of this transition differs by subject area, with many in the arts, humanities and social sciences lacking funding to pay for open access. The fact that so few journals have flipped is not because society publishers have stood in the way of open access, but because only a minority of the world's funders mandate (and fund) immediate open access.

Our collective understanding of scholarly communications and our experience with open access over the past twenty years suggests that withdrawing support for hybrids will actually retard the movement towards immediate open access of the version of record:

- By withdrawing support for open access fees in hybrid journals, many authors will revert to publishing their articles behind paywalls in their preferred journals, backed by immediate deposition of the accepted manuscript in a repository ('green' OA).
- Green OA articles are generally less discoverable than the version of record, with discoverability and accessibility highly dependent on the variable technical standards of each repository instead of relying on international standards for linking and markup. Very few repositories currently meet these standards.
- Disciplinary coverage of OA journals is patchy. In many disciplines, predatory or otherwise dubious commercial publishers are the primary alternatives to high-quality society journals.

In addition, while we are willing to explore alternative models, we remain unclear about what, specifically, qualifies as being a transformative agreement. We are also unable to negotiate terms around these experimental and yet-to-be defined offerings, within the constraints of the prescribed Plan S deadlines, without taking large risks that jeopardize our revenues and, by extension, our ability to continue to re-invest in and support the research communities we serve. Creating a universal, successful and sustainable alternative publishing environment that aligns with our strong belief in high-quality publications cannot be achieved in as short a timeframe as Plan S currently allows.

At the present time negotiating read and publish deals is only realistic for the very largest commercial publishers. Experience has shown us that the small size (and large number) of learned society publishers means we do not get a seat at the table in such negotiations. This means that Plan S (with its emphasis on transformative agreements) actually risks advantaging the large, commercial players at the expense of the learned society sector.

How cOAlition S can help

Stability
We urge the members of cOAlition S to be consistent in their application of the principles of Plan S and encourage other funders to do the same. We are more likely to be successful in transitioning to full open access under a uniform, stable set of rules than under a patchwork of mandates.

Clarity
We request that all cOAlition S members clarify which types of scholarly outputs are in scope (confirming specifically whether the mandates apply to primary research only, or if they extend, or are likely to extend in the future, to review articles, commentaries, editorials and other such outputs). We also ask that the cOAlition be specific about what criteria will be used to determine whether an agreement qualifies as being 'transformative'.

New guidelines and 'flipping thresholds' for hybrids
We appreciate that one of the main objections to hybrid is concern over some publishers 'double dipping' by maintaining or increasing subscription prices even as they generate revenue from open access article processing charges. We wish to work with cOAlition S to reframe the blanket prohibition on hybrid journals and, instead, develop a set of clear rules to eliminate double dipping and allow those hybrids which follow them to be funded by cOAlition S. We suggest that these guidelines should be paired with recommendations on when journals should flip from hybrid to pure open access based on percentage of open access content rather than an arbitrary time deadline. This will provide society publishers with a clear, sustainable route to open access that also meets the needs of funders, institutions and researchers.

Preparation and groundwork
We appeal to cOAlition S to ensure that institutions, consortia and funders are able to reorganize purchasing channels and realign budgets so that new offerings, developed in support of a transition to open access, are relevant and applicable to institutions. We are ready to support and collaborate in order to achieve this; our best intentions to transition to open access will fail unless funding commitments and payment workflows are compatible with (or capable of supporting) new, transformative deals. This need extends to ensuring that workflows cater to unfunded and self-funded researchers.

Opening doors
As described above, the smaller self-publishing society publishers within the group - those of us who do not partner with large commercial entities - have experienced real difficulty in initiating negotiations for potential transformative agreements. We would therefore ask that cOAlition S consider this when developing implementation policies. In order not to rule out (exclude) an important set of publishing relationships cOAlition S could: (i) provide support in the construction of a framework licence for a transformative agreement that would not violate competition law and (ii) actively encourage consortia to come to the negotiating table with us and with other societies.

Signed: The Society Publishers' Coalition

Biochemical Society and Portland Press

British Ecological Society

British Pharmacological Society

British Society for Immunology

International Water Association Publishing

Microbiology Society

Royal College of Psychiatrists

Royal Society Publishing

Society for Applied Microbiology

Society for Endocrinology

The Company of Biologists

The Physiological Society