

Guidance on the Implementation of Plan S – Feedback

As a scholar of open access policy, I welcome the renewed effort to achieve full open access through a co-ordinated coalition of research funders. There is much that I agree with in the current plans and implementation guidelines, such as ending support for hybrid open access, the removal of embargo periods, a potential cap on APCs, and support for DORA. Since other organisations and individuals have already submitted detailed feedback to this consultation – the response from COAR on the repository requirements,¹ for instance, is excellent – in this response I will focus on areas that risk being overlooked.

I believe that in one important aspect, the current plan requires significantly more attention – it has not adequately considered the effect on authors situated in the global South. Unlike an open access policy that is enacted in one particular nation, Plan S potentially has a much wider scope for impact. Therefore it is vital to consider the implications of the plan even for those situated outside of signatory nations, as Dominique Babini of CLASCO has eloquently argued.² The fact that funders in the US and China are now supporting Plan S signals the growing international interest in it, and the policy is likely to have far-reaching consequences for journals and publishers situated outside of signatory jurisdictions.

The quality criteria for Plan S compliant Open Access journals and platforms appear designed for science journals based in the global North. Many small journals, in particular in the humanities and those journals published in languages other than English, are published independently and with minimal financial or technical support. Proposed criteria such as membership of CLOCKSS and the use of XML format will be extremely difficult for low/zero budget journals – many of which publish important high-quality research in niche areas – in the timescale required by Plan S. Of course, part of the reason for Plan S is to force journals to change some of their practices, so it is inevitable that some journals will face difficult changes. However, if the burden of compliance disproportionately impacts small scholar-led journals rather than the large well-resourced commercial publishers, the unintended consequence could be to weaken the broad base of unique independent journals. Given the widespread use of PKP's OJS software for such journals, one solution would be for cOAlition S funders to provide support (both financial and otherwise) for the

¹ COAR (2018). *COAR's Feedback on the Guidance on the Implementation of Plan S*. <https://www.coar-repositories.org/files/COAR-response-to-implementation-of-Plan-S-1.pdf>

² Sayer, Lizzie (2018). *Plan S and Open Access in Latin America: Interview with Dominique Babini*. 2 Feb 2019. <https://council.science/current/blog/plan-s-and-open-access-interview-with-dominique-babini>

OJS project to enable them to integrate policy requirements into its software. This approach is also recommended by Jan Erik Frantsvåg and Tormod Eismann Strømme's analysis,³ which highlights the problems for small publishers of non-APC funded journals.

The requirement that the 'journal/platform must provide automatic APC waivers for authors from low-income countries and discounts for authors from middle-income countries' is well-intentioned. However, as both myself and others have argued elsewhere,⁴ APC waivers are problematic, and entrench an unbalanced power relation between nations in different parts of the world. Rather than risk appearing to offer only a tokenistic solution through APC waivers, it would be better to also offer firm and explicit support for non-APC funded gold open access.

The requirement that 'contracts (including costs) of such agreements need to be made publicly available' is admirable. Transparency of publishing costs is important and I hope cOAlition S will build on work already underway in this area. I am unsure whether the level of transparency hinted at in the guidance is possible, but at the very least, publishing the contracts – and their overall cost – is necessary.

Finally, regarding transformative agreements, I welcome the recognition that such agreements must be genuinely directed towards transitioning to a full open access environment. At present, offsetting (or 'read-and-publish') agreements do not achieve this and merely prolong the 'hybrid' transition phase. My three-year evaluation of the UK's offset agreements for Jisc Collections⁵ reveals that offsetting has enabled some 'cost avoidance' but has not reduced the total amount paid by higher education institutions for scholarly publishing.

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³ Frantsvåg, J.E. and Strømme, T.E. (2019). Few Open Access Journals are Plan S Compliant, *Preprints*, 2019010165. <https://doi.org/10.20944/preprints201901.0165.v1>

⁴ Peterson, A.T., Emmett, A. and Greenberg, M.L. (2013). Open Access and the Author-Pays Problem: Assuring Access for Readers and Authors in the Global Academic Community, *Journal of Librarianship and Scholarly Communication*, 1(3), p.eP1064. <http://doi.org/10.7710/2162-3309.1064>; Lawson, Stuart (2015) Fee Waivers for Open Access Journals, *Publications*, 3(3), 155-167. <https://doi.org/10.3390/publications3030155>

⁵ Lawson, Stuart (2018). Report on offset agreements: evaluating current Jisc Collections deals. Year 3. *Zenodo*. <https://doi.org/10.5281/zenodo.1473587>