



The Open Letter: Reaction of Researchers to Plan S: too far, too risky.

A response of the Fair Open Access Alliance

We write to provide a counter view to the recent open letter (“Plan S: Too Far, Too Risky”),¹ partly based on our FOAA recommendations for the implementation of Plan S.² We are glad to note that the researchers who have signed the open letter support open access as their very first principle. However, the letter itself goes on to make a number of highly problematic and logically fallacious statements with which we strongly disagree and here contest.

More broadly, the letter fails to provide any solution to address the problematic situation academia has maneuvered itself into with regards to scholarly publishing. As it stands, the open letter is a set of demands on the funders, without any responsibility assumed by the researchers themselves for the ongoing serials crisis, nor for providing solutions. In this document we review the items in the open letter systematically.

1. Hybrid (society) journals

The Letter states: “The complete ban on hybrid (society) journals of high quality is a big problem, especially for chemistry.” This statement is not correct. First of all, Plan S does not ban hybrid journals, it simply aims at persuading funders to stop paying APCs to them as these titles have proved an ineffectual mechanism for a transition to OA. Beyond the fact that it is unclear why chemistry thinks itself exceptional here, Robert-Jan Smits has explained on several occasions that Plan S will allow researchers to publish in hybrid journals **if** the article is published simultaneously in a repository or archive **without an embargo and under a CC BY license**. In the Wellcome Trust’s implementation of Plan S, the version that must be available is the AAM (author’s accepted manuscript). Several publishers, such as Emerald and SAGE, already offer zero-embargo green OA. In addition, while coalition funders will not pay APCs for hybrid journals, they will not prevent authors from finding research funding from other sources.

Contrary to the claims of the Letter, Plan S takes into account the full landscape of open access, as clearly acknowledged in Principle 3: “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;” and Principle 8 “The importance of open archives and repositories for hosting research outputs is acknowledged because of their long-term archiving function and their potential for editorial innovation;”.

¹ <https://sites.google.com/view/plansopenletter/open-letter>

² <https://www.fairopenaccess.org/2018/10/21/foaa-recommendations-on-the-implementation-of-plan-s/>

The open letter claims that researchers (at least in chemistry) “won’t even be able to legally read the most important (society) journals.” This is nonsense. This claim implies that researchers will cease to have legal access to these journals through subscriptions. If this were the case, it is very unclear how Plan S could be held responsible. The intent of Plan S is that journals flip to open access which would mean they were legally accessible to everyone. However, if as seems to be claimed in the letter, libraries were to cancel subscriptions, this would not be in response to Plan S but due to the unsustainability of ever increasing subscription costs. The letter goes on in the second point to acknowledge the issue with exploding costs to subscriptions without offering any solutions to the problem. Furthermore, the authors assume without argument or evidence that all journals (at least in chemistry) “with a valuable and rigorous peer-review system of high quality” will either fold or fail to adapt.

The open letter also assumes that Plan S will lead to the death of learned societies. Indeed, learned societies that publish academic journals sometimes derive considerable profits or surpluses from the subscription system, and have benefited substantially in the past decade from funder requirements to make research open access under the hybrid system. As an example, the American Chemical Society has a highly complex fee structure for article processing charges,³ taking full advantage of the situation, where a funded non-member from an institution that does not subscribe must pay \$4000 for immediate access (a requirement of the funding paying the APC) and a surcharge of \$1000 for CC BY (again a requirement of the funding paying the APC), a total of \$5,000 – when the average APC is approximately \$2700. These profits or surpluses are often used to support research activities. As a result, learned societies have a financial interest in maintaining the subscription, and specifically the hybrid, system. It is true that there are large differences between research fields here, in that chemistry derives more money from the (hybrid) subscription system than other fields.

A more productive approach to the conversation would be to focus on alternatives to subscriptions that pay for society income rather than attacking Plan S. For it is, indeed, bizarre that library budgets should bear the brunt of funding disciplinary activities. That said, an alternative income for scientific societies is possible under a publication-fee model as well. For example, the publication fee is capped under Plan S, which allows for a difference between the real cost of publishing and the cap paid by the funders which could be reserved for the learned society. This solution does require that the cost of publishing is made completely transparent by publishers (societies in this instance).

FOIA recommended cost transparency as a crucial factor for the implementation of Plan S. We believe publishers should be required to provide the actual breakdown of costs contained in the publication fee, and make this information publicly available. An example of how this works in practice is the 2016 release by eLife of their costs to

³ https://pubs.acs.org/pb-assets/documents/4authors/ACS_SalesChart.pdf

publish.⁴ Without this transparency the cap will be established as a new price-point that will allow publishers to renegotiate it every few years, and allow those with actual costs below the cap to raise their costs to meet the cap. A subset of publishers have already agreed to the FOAA cost transparency proposal in the Transparent Transition to Open Access (TTOA consortium).

2. A transition from hybrid to full Open Access

We further recommend that a policy be defined to help publishers and Editors-in-Chief of hybrid journals to transition to full open access within a 3-4 year period, reporting on progress every year. The transition of hybrid journals to non-hybrid or full Open Access journals will need an infrastructure in line with Principle 3 of Plan S: FOAA has taken an initiative to help journals transition to open access in the aftermath of Plan S with its TTOA platform.⁵

Nobody wishes to ‘ban’ society journals: the request here is to use imaginative ways to make the transition of those journals to an open access model, which would do much more for the societies’ disciplinary advocacy work. A number of journals have already gone that route, and have – in a very short time - been able to fully maintain their readership and reputation in their communities (see the highly successful transition of the editorial board of Elsevier subscription journal *Lingua* to Fair Open Access *Glossa*, and that of Springer’s *Journal of Algebraic Combinatorics* to *Algebraic Combinatorics*). These journals have shown that the scientific reputation of a journal lies with its editorial team, not with the name or with the publisher. If editors in linguistics and mathematics can flip their prestigious journals to open access, at no cost to their reputation, editors in other fields should be able to do so as well. A transition to full open access is the best thing editors of prestigious journals can do to help establish the reputation of younger scientists with access to cOALition S funds.

Further, the authors of the Letter claim that they “expect that a large part of the world will not (fully) tie in with Plan S”. In the meantime, important funders such as the Wellcome Trust and the Gates Foundation have already joined Plan S. For Plan S to succeed, it is essential that not only funders take a principled stand, but that editors of hybrid journals join forces to urge their publishers to flip the journals to full open access.

3. The cost of publication

The signatories of the letter say they understand concerns about exploding costs of journal subscriptions. But they also state that “with its strong focus on the Gold OA publication model, in which researchers pay high APCs for each publication, the total costs of scholarly dissemination will likely rise instead of reduce under Plan S”. However, Plan S does not mention APCs nor Gold OA. It refers only to Publication Fees: this is a much broader term that encompasses multiple options. One example is the

⁴ <https://elifesciences.org/inside-elifesciences/a058ec77/what-it-costs-to-publish>

⁵ <https://www.fairopenaccess.org/wp-content/uploads/2018/05/Public-statement-TTOA-consortium-30may18-def.pdf>

SCOAP3 consortium where libraries pay a 'subscription' to journals that are openly accessible. This approach opens the possibility that no-fee journals can also be compensated for their efforts. Thus, Plan S provides funding for all publication venues with the exception of hybrid journals. Furthermore, APCs need not make the total costs of dissemination rise further: the average cost to the international community of a research article under the current subscription system is currently about \$3800.⁶ Even a generous cap of \$2000 per article will almost halve that cost. Plan S clearly states that it will cap open access publication fees, a fact that the signatories of the Letter ignore. There is no reason that researchers would be confronted with high APCs if editors are incentivized to transition their high-quality journals to open access with a standardized publication fee paid for every article.

4. Academic freedom

The Open Letter states that 'Plan S is a serious violation of academic freedom'. Yet the claim that academic freedom is being violated is overstated. At its heart, academic freedom concerns the freedom of inquiry and the freedom to communicate research results and ideas without reprisal. In that sense, Plan S actually guarantees a greater academic freedom than that afforded by the authors of the Letter: open access will mean that the greatest number of readers will have access to published ideas, rather than debate being hampered by a paywall. It is highly debatable whether academic freedom should extend to the freedom of researchers to choose their publication venue: an author's freedom to publish wherever they want ends where the reader's right to freely access research starts. In actual fact, researchers never enjoy complete freedom of publication, as papers are often rejected, and subsequently published in a journal that is not the journal of original choice. Funders, by contrast, have the right to determine how, or at least under what access terms, the research they fund should be published: he who pays the piper calls the tune. Nobody is forcing researchers to accept grants from these Funders if they truly believe their choice of publication venue is being restricted by them.

In conclusion, the Letter offers plenty of unargued criticism, but no viable alternative to the currently unsustainable academic publishing landscape. Worse, it fails to grasp the opportunities offered by Plan S to do so.

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⁶ https://pure.mpg.de/rest/items/item_2148961_7/component/file_2149096/content