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SRCD submits Feedback on the "Guidance on the Implementation of Plan S"

On January 30, 2019, SRCD issued a "Call to Action: Comment on European open science initiative, Plan S." Below is SRCD's formal comment, submitted February 7, 2019.

Feedback on the Guidance on the Implementation of Plan S

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

The Society for Research in Child Development is an international learned society with over 4,000 members. The society is a non-profit dedicated to advancing developmental science. In service to this mission, we manage several journals, and seek to represent the interests of our members in supporting academic publishing. We have followed the work of cOAlition S with growing concern that the interests of scientists are poorly represented. We are particularly concerned about the 'one size fits all' approach to academic publication embodied in Plan S. In its present form, Plan S will do irreparable harm to our field directly and indirectly by damaging the learned societies that act as stewards of science and research.

Our central concern is that basis for establishing publication fees (e.g., article processing charges) mandated by Plan S is unclear. We are concerned that critical inputs for academic publishing will not be considered in the fee structure. Any determination of costs of academic publishing must consider the following:

- Our society is extremely diverse. Many of our scientists work in contexts with limited funding, at poorly-resourced institutions, and conduct research that does not require grants or significant financial support. An APC model of publication will discriminate against certain researchers and

certain areas of research. Plan S mandates that APCs be waived for low-income countries (and reduced for middle-income countries). It is naïve to hope that institutions or funding agencies will step in to provide support for publication fees sufficient to cover the necessary waivers. Moreover, mandating subsidies for low- and middle-income countries addresses only one kind of bias introduced by the APC pricing model. As currently configured, Plan S will distort our science and seriously hamper attempts to promote diversity and inclusion in our field. How will authors unable to cover publication costs be assured access to scholarly journals?

- As many others have noted, the APC model rewards low quality journals and punishes selective ones. Our society maintains high standards for academic publication, and devotes considerable resources to vetting journal articles. Unless the plan for APCs recognizes this fixed cost for a selective journal there will be a race to the bottom that will fundamentally undermine the scientific enterprise. How will the costs associated with highly selective outlets be factored in to Plan S?
- The idea that different authors/institutions will be covered by different publishing requirements has the potential to be very disruptive to the field. Researchers will have difficulty collaborating and selecting the appropriate outlets for their work. Scholars covered under certain policies may be disadvantaged in disseminating their work and receiving recognition for their contributions. Finally, a proliferation of specific publishing arrangements will advantage large publishing companies and hurt smaller presses and organizations. The specific APC structure established by Plan S rewards economies of scale, further disadvantaging smaller operations. How will Plan S ensure equitable access to scholarly publications, and support a diverse network of outlets for publication?
- The greatest cost associated with academic publishing is the scientific expertise required to solicit, review, and edit articles to ensure quality and advance the field. Currently, this expertise is donated: Editors and reviewers volunteer to produce the journals. As this work is not monetarily compensated it is not included in the budget models that set APCs. Editors and reviewers donate their time for many reasons, but for journals owned/managed by a learned society, one of the motivations is to support the society. Our editors and reviewers recognize that their efforts generate revenue for the society. Put another way, a learned society contributes significant value to an academic journal by organizing the scientific review required. At least in our case, we depend on the revenue generated by our publications to allow us to carry out this critical function, and to provide other essential services to supporting our field. How will the costs of peer review be factored in to Plan S?

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

Funders should consider direct payment for peer review. The implementation plan mandates peer review in archives and repositories. How will this peer review be compensated? Learned societies are the natural bodies to organize peer review. Funders should explore contracting with learned societies to provide the mandated peer review.

We recognize that the current subscription model of academic publishing has serious problems. We applaud the goal of making science widely available, and we share the concern that research funds be used to support science rather than to enrich publishers. However, we feel that Plan S is an inappropriate response to real problems because it does not take into account impact on all aspects of the publication ecosystem. The plan does not adequately address the diversity of scientists or the role of learned societies in the publication process, nor has development of the plan sufficiently considered the impact on such societies. At a minimum, funders should require fair compensation for peer review and editorial oversight. We ask that cOAlition S work with organizations of learned societies to develop an alternative to Plan S. Societies are part of the solution, not part of the problem. The landscape of science and publishing are changing radically. These changes require vibrant, effective, and well-resourced learned societies more so now than ever.