

## *Feedback on Plan S to Academy of Finland*

To Academy of Finland,

we, the researchers from University of Oulu signed below, express our concerns for the Finnish science under the effect of Plan S as proposed in its current form. We commend the Academy of Finland on the support of responsible science policy, but we believe that Plan S will make Finnish science internationally much less competitive and undermine positive developments in Open Access (OA) achieved in the past years. Our concerns originate from general issues of Plan S, which we describe in the attached feedback, which is sent also directly to cOAlition S. This letter discusses impacts on Finnish science in particular.

### **1. Plan S restricts the view of Open Access instead of broadening it**

Plan S interprets OA in a very narrow sense, making estimated 85% of journals non-compliant<sup>[1]</sup>. This has consequences for all stakeholders: funders are reluctant to join over concerns of negative impact on scientists and science funding<sup>[2]</sup> and there is very little room for negotiations with publishers within the framework of the strong demands of Plan S. Finally, and most importantly, the strictness of Plan S effectively prohibits researchers from publishing in majority of journals, with reputable ones being affected more than lower level ones. Considering the research articles are one of main outputs of researchers and basis of their evaluation, this presents a particularly serious problem.

The strictness of Plan S can be demonstrated by its effect on the current publishing situation. About 50% of Finnish science is already open access, but Plan S does little to increase this number. Instead, it is a policy which restricts what counts as a compliant OA. Taking the University of Oulu as an example, about **42% of publications from 2018 are fully OA<sup>[3]</sup>**. However, only **17% of publications are published in a compliant and currently feasible manner** as defined in Plan S, i.e., in fully open journals<sup>[4]</sup>. The remaining articles are either deposited in the institutional repository of the University of Oulu (11%; **no embargo, but the repository is not Plan S-compliant**, even though it is fully compliant and registered in OpenAIRE), published in Hybrid OA through article processing charges (APC) or Read&Publish non-transformational agreements (11%) or in fully OA, but nevertheless non-compliant, journals (3%). Thus, **Plan S describes less than half of currently fully OA articles as being compliant**, since the other two options (self-archiving in repositories and hybrid journals) are rendered unsuitable according to Plan S-imposed arbitrary restrictions.

**Since plan S does not enable new ways to open science, but instead limits its view of OA to a minor subset of current options, it can be interpreted in the context of our university – and likely Finnish academia as a whole - as a step backwards in OA.** We acknowledge the current model of OA by Academy of Finland as more benevolent and cost-effective alternative.

### **2. Too tight timeline**

Plan S takes the often cited slowness of transition to OA to the other extreme, where it is unlikely that it can be implemented in the prescribed timeline, given that the policy is still collecting feedback less than 11 months from its scheduled start. Moreover, the study on proposed cap of APC is still forthcoming, as is the study on what fields will be impacted the most and may need support. Several countries are yet to assess the financial and scientific impact of Plan S<sup>[2]</sup>. Without knowing the cap on APCs, publishers' hands are tied to respond to the requirements, develop new

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[1] <https://www.nature.com/articles/d41586-018-06178-7>

[2] <http://www.sciencemag.org/news/2019/01/will-world-embrace-plan-s-radical-proposal-mandate-open-access-science-papers>

[3] Based on University of Oulu database of publications and current interpretation of Plan S.

[4] Number of OA journals was estimated solely by the broadest criterion of being registered in DOAJ. The real amount accounting for all criteria might make this number even smaller.

models and offer negotiable terms. As we have seen in the past years, such negotiations can take over a year and it is rather unlikely that new ones could be finished in shorter time considering the drastic changes proposed by Plan S. Moreover, many institutions have in place recently renegotiated agreements spanning years ahead. Pushing for new negotiations under the tight time schedule is not beneficial, or even feasible.

### **3. Low support from funders**

It has been estimated that the original **members of cOAlitions S amount for only about 4% of world's scientific output**<sup>[5]</sup>. This means that whole combined leverage of cOAlition S members to exert pressure on publishers is extremely weak. Several countries and organizations expressed their support of Plan S, but they have not entered the cOAlition and thus do not officially give support to the Plan S's mandate. No new member has entered the cOAlition in the past two months, which in itself shows that funders are concerned of its feasibility and impact<sup>[2]</sup>.

If Plan S does not gain momentum - and it currently does not appear to - publishers will have no incentive to switch to new models. **This will lead to marginalization of researchers supported by cOAlition S members by their exclusion from the vast majority of established journals, while achieving very little in pushing for open access.**

**Unless Plan S gains much larger support base, it is not a feasible policy. The creators of Plan S should review the reservations non-members are expressing over it and where these issues originate.**

### **4. Overall costs are very likely to increase, instead of decrease**

With current low support of Plan S, over 90% of the world's scientists will continue to publish in subscription journals, **forcing the Finnish institutions to keep the subscriptions** in order to access newly published international articles. However, additional financial resources would be needed to pay for the **newly arisen APCs under Plan S, and establishing of Plan S-compliant repositories** or systematic support for development of existing ones (see also point 5).

We note that current Open Access policy of Academy of Finland allows for green embargoed OA, an option that carries much less financial burden in currently established ecosystem of repositories, but is not Plan S-compliant. **Thus, we can conclude that the publishing costs under current Plan S are very likely to rise.**

### **5. Restricting Green OA**

The Plan S's guidelines are too strict on the demands put on repositories. As pointed out by The Confederation of Open Access Repositories (COAR)<sup>[6]</sup>, this makes only a few of the largest, centralized repositories possibly compliant, even though many more may be of high quality, e.g., by being fully compatible with OpenAIRE. This renders unusable practically all smaller repositories run by institutions<sup>[6]</sup>, who do not have available personal, technical and/or material support to develop the required features. Such situation effectively leads to wasting of the resources invested in their establishing, clearly an undesirable step. Instead, **the goal should be the maximal support and reuse of existing self-archiving infrastructure, and not hindering it by imposing unnecessary technical limitations.**

### **6. Quality of the journals**

The Plan S implementation guidelines stress technical quality of the journals (use of metadata, machine readability, etc.) while only superficially addressing the differences in scientific quality of the journals. In fact, Plan S uses San Francisco Declaration on Research Assessment (DORA) to entirely avoid this discussion, ignoring the existing situation in science.

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[5] <https://deltathink.com/news-views-potential-impact-of-plan-s/>

[6] <https://www.coar-repositories.org/news-media/webinar-on-plan-s-and-repositories/>

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While we appreciate DORA's intention to curb the mindless abuse of bibliometric indicators, its principles have not yet been widely implemented worldwide. DORA's reward and promotion systems need to be firmly globally in place before any science policy intends to use it to disregard the differences between journals.

Moreover, we would like to point here our understanding of distinction between purely arithmetic metrics, such as journals' impact factor, and the quality the journal carries in its field and community through its established reputation. Rigorous peer-review process, expert editorial boards and consistent policies of reputable journals help to increase the quality of submitted manuscripts and through it contribute to higher level science and more effective use of research funding.

It is clear that the differences in journal quality are also embedded in science policy in Finland, as documented by existing JUFO classifications and the research quality evaluations based on them. In this respect, it should be pointed out that there is proportionally less Plan S-compliant journals in JUFO classes 2 and 3 compared to class 1. Plan S thus leads to **decrease in publication possibilities in journals** of higher JUFO classes, **which are perceived both in Finland and globally as leading in their field** and which provide the highest impact in both scientific community as well as in public dissemination.

### **Recommendations for future actions**

At present, Plan S appears stalled as no new funders have joined in the past two months (as of 23 January 2019). This is a most concerning development as it might show a lack of faith in its feasibility and impact. Under such circumstances the ability of cOAlition S to initiate a significant change in publishing is very weak and scientists funded under it are threatened by marginalization of their research through banning of reputable journals. As we have described above, Plan S on its current track in Finnish context

1. **marginalizes research impact of Finnish science** via banning publishing in majority of journals, with more severe impact for high-quality ones
2. very likely **increases the costs of publishing** by bringing new expenses in the form of APC, while not improving the situation about the subscription costs
3. hinders development of OA in Finland by putting unnecessary restrictions on established repositories, and requiring further investments in their development or establishing new, compliant ones
4. **contradicts the methodology of science quality evaluation** based on JUFO-levels of journals, which is negatively correlated with Plan S compliance

We acknowledge Academy of Finland's support of the OA movement and evolution of publishing system by entering cOAlition S. However, in order to succeed Plan S urgently **needs to loosen its narrow view of OA** and attract much **broader global support from funders representing significantly larger portion of world's research funding**. These funders need to be committed to Plan S via entering cOAlition S, not merely expressing their support for OA via a statement. Unless this happens in the coming months, we strongly recommend Academy of Finland to **consider withdrawing from Plan S in its current form** to avoid binding researchers into a policy that would not have the power to initiate a significant change, but would come with great costs for Finnish science, both financially and academically. Such act will not in any way prevent Finland from further developing its own national OA policy, without being bound by externally imposed unfeasible restrictions.

We hope that a new solution, acceptable for funders, publishers, and researches alike, can be found, perhaps even through significant amendments to Plan S, which would enable a true step forward in responsible and sustainable science publishing.