

## **PLAN S – A contribution from the Social Sciences and Humanities scientific community**

**EASSH recognises Plan S overall principles to make available and affordable the results and publications of publicly funded research. However, we raise concerns about the implementation and its timetable, which could hamper European research for years to come and we flag possible unintended adverse effects on the next generation of scholars in Europe.**

**We address three main areas of concern: (a) quality and licences; (b) impact on European scholars' career in a fair and competitive international research system; (c) infrastructures and OA platforms (including impact on learned societies). We propose a set of recommendations to facilitate the next phase of implementation.**

EASSH supports the principles undergirding the move to increased Open Access (OA) for research and scholarship across Europe. The wish to enhance access to knowledge for the community's citizenry, with all that this suggests in terms of open democratic societies, is, undoubtedly laudable.

We warmly endorse the concept of robust and sustainable [OA repositories](#) supported by public funding that will preserve and curate scholarly publications for future generations (eg. <https://hal.archives-ouvertes.fr/>; <https://www.nakala.fr/>; <https://zenodo.org/>).

We welcome the statement that guidance on Open Access monographs and book chapters will be issued at a later stage. As part of our direct contribution, [EASSH](#) and [OPERAS](#) are collaborating on a roundtable with publishers in early March 2019 to provide a set of recommendations on monographs and OA to be made available for the cOAlitionS implementation task force.

However, the proposed implementation of Plan S raises a number of issues that deserve further consideration and more time beyond January 2020.

### **Preliminary remarks.**

While the research community has expressed some scepticism towards Plan S, this is not because it is disrupting current publication practices, rather it is because the research community discerns this as a policy driven by the competing demands of research councils, libraries and publishers. We strongly advocate that the **best interests of research should drive the plan**. We also believe that **the policy introduces unfair competition between research systems** and institutions that can 'afford' to pay for Open Access and those that cannot. In particular, in some disciplines, e.g. history in UK, only about 15% of articles are currently published via the Gold OA route, because authors do not have access to institutional or other funds to pay APCs. We have evidence that those numbers are even smaller in other national systems and in other vulnerable disciplines, even if some

countries promote OA for all fields, like Switzerland that plans to get all the SNSF publications in OA in 2020<sup>1</sup>.

To address this imbalance, and in the spirit of collaboration, EASSH has identified the possible unintended effects of the proposed policy, especially for career-young researchers. In addition, we suggest some practical guidance about implementation in order to alleviate these effects.

We will focus on three main aspects: (a) **quality and licences**; (b) **impact on academic careers in Europe in a fair and competitive international research**; (c) **infrastructures and OA platforms, including the impact on learned societies**. Finally, we provide a list of key points that the implementation task should, in our view, consider very carefully.

### **Quality and Licences**

Quality is the ultimate marker of research. For many years, scholars have engaged with thorough peer-review processes, usually with no reward in order to ensure that publications are the results of careful and methodologically robust scientific investigations. The draft text of Plan S states that in some cases, newly established OA journals do not have yet a 'solid system' for reviewing. Such a 'solid system' needs indeed to be developed, with new research teams and platforms. We encourage the recognition of the value of hybrid journals as compatible with the principle of OA, especially when the green route helps implementing the transition to more robust quality controls mechanisms. We do value gold OA, but only as long as the usual quality standards are applied.

With regard to the use of licences: we strongly urge the inclusion of No Derivatives (ND) in the licence for any OA publications in order to protect text from being taken out of context for commercial or inappropriate use. This is a matter of scholarly integrity and public trust in science. This is especially important in the Humanities and Social Sciences where the published text is the heart of the research.

### **Impact on European academics careers in a fair and competitive international research system**

We propose to carefully evaluate the timetable for any implementation of plan S and suggest an extension to the current deadline of January 2020. Too many details are still unclear and a transition period is needed to explore with some pilots the impact of some necessary changes.

Publications are the main currency for career development, particularly in highly competitive research institutions across the world. Research is very often internationally disseminated and global competition stimulates the circulation of ideas. Many academics and Universities rely heavily on journal reputation in judging academic excellence. So, as long as the principles of assessing research and career are dependent on the current

---

<sup>1</sup> See <http://www.snf.ch/en/theSNSF/research-policies/open-access/Pages/default.aspx>. For an international comparison by the European Commission, see "Trends for open access to publications", [https://ec.europa.eu/info/research-and-innovation/strategy/goals-research-and-innovation-policy/open-science/open-science-monitor/trends-open-access-publications\\_en#open-access-to-publications](https://ec.europa.eu/info/research-and-innovation/strategy/goals-research-and-innovation-policy/open-science/open-science-monitor/trends-open-access-publications_en#open-access-to-publications).

system, and Plan S is mainly a European initiative, the policy would have a detrimental impact on promotion prospects and the ability of early-career researchers to transfer to research systems which do comply with Plan S.

Furthermore, introducing an upfront payment to make an article available in OA means introducing a bias in relation to the structure of the grants. Some disciplines are significantly better funded than others and there is great differentiation in the countries of Europe in relation to available funding in support of all research costs. In some research areas, grants are relative small and compliance with plan S means that the costs of publications could use a substantial share of such grants.

An unintended effect of Plan S implementation may be to create a two-gear mechanism **which distinguishes between 'rich' research systems that can count on the definition of effective and generous funding for both publications and publications platforms**, or can rely on institutions that are able to afford to establish their own publication presses; and those research contexts and institutions that will bear the costs of open access implementation.

### **Infrastructures and OA platforms, including the impact on learned societies**

The declaration claims: “*Scholarly articles are compliant with Plan S if they are published in compliant Open Access journals or on compliant Open Access platforms*”. First of all, the OA platforms are not equally developed in all geographical areas or in all disciplines. The discussion around the [European Open Science Cloud and OpenAIRE](#) is still in its infancy and at the national level in European Member states and several other countries, the discussion is still on its way. Furthermore, the cOAlition S is only working on understanding of standards of interoperability in major OA directories.

We propose that funding must be made available to support those disciplinary areas, platforms and journals that have only just started the journey towards new fully OA publications. Pilots and financial support, as well as technical guidelines, are needed to establish new instruments and infrastructures. In particular, our main concern is focused on those publications managed by learned societies. These are in the most vulnerable position: they are usually funded by endowments and membership dues, they operate in regional, national, and international contexts that may not fit governmental funding parameters for research funding, and their business model sees the reinvestment of the money from publications into the academic systems through a number of measures (scholarships, grants, thesis publications, conferences etc.). Some of these disciplinary learned societies have guaranteed the survival of crucial branches of science often ignored by mainstream research funding. These organisations play an important role in a retaining a wide base for science and in developing research interests.

Our recommendations are listed below.

## **Recommendations for the task force**

1. Postpone the implementation of Plan S enough to address the issues below:
  - a. Current strategies of implementation do not take into consideration the unintended effects of creating asymmetries between research systems that can bear the costs of OA and poor research systems that lag behind;
  - b. Not all newly operating fully OA publications have proved to have quality evaluations systems in place to be of comparable standards of existing high ranked journals;
  - c. The impact on the career of researchers and their mobility is still unclear given that Plan S is mainly a European initiative.
2. Include No derivatives (ND) in the licence for any OA publications. We strongly recommend the application of “preferably CC-BY and not restricting it” and ND, in order to protect text from being taken out of context for commercial or other inappropriate use.
3. Avoid the boycott of hybrid journals and parallel repositories publishing as is the case now because they are not incompatible with the principle of Open Access. They are playing a key role in facilitating its development and extension in History and the Humanities more generally.
4. Fund infrastructures for a smooth implementation of Plan S. European funding sources have invested for years in Open AIRE standards for repositories, but interoperability of these repositories remains very weak. EOSC needs to support the establishment of strong and well-supported platforms.
  - a. funding for newly establishing OA platforms and journals
  - b. funding for supporting learning societies journals in the transition.
5. Include incentives for scholars and academic institutions for establishing Open Access journals and publications platforms. Here too without significant investment by national and EU funding, it is likely that these platforms will not prove adequate to the challenge.