

Plan S consultation response from the Royal Society of Chemistry

- The Royal Society of Chemistry (RSC) is committed to increasing open access to high quality scholarly research. Our Charter directs us to foster and encourage the growth and application of the chemical sciences through the dissemination of chemical knowledge.
- As a Learned Society publisher, we have made significant progress in open access over the last few years.
 - We publish the largest Gold open access journal in the chemical sciences, *RSC Advances*, which last year published over 4,600 articles.
 - Our flagship journal, *Chemical Science*, is free to read and free to publish, with the RSC covering the article processing charges of this journal as part of its charitable aims to further the chemical sciences.
 - We have developed a Read & Publish model in partnership with our customers – a recognised stepping-stone in the transition to open access.
 - In 2017 over 25% of the 35,000 articles the RSC published were via a Gold open access route.
 - We do not require authors to transfer copyright for any of the articles they publish with us (subscription or open access) and our Gold open access journals publish under the CC-BY license.
 - This spring we launched *Nanoscale Advances*, our third fully open access journal.
 - We co-own ChemRxiv, a new chemistry preprint server, along with the American Chemical Society, the German Chemical Society and other not-for-profit organisations, as another means to facilitate the rapid and open dissemination of important scientific findings. This service is provided free of charge to authors and readers.
- Overall, the RSC supports many of the principles outlined in Plan S, and recognises that its implementation has the potential to create opportunities to further accelerate the move to open access. At the same time, the RSC believes that implementation needs to be pragmatic and designed to reduce rather than increase the complexity for researchers or their workloads. To this end, we provide a detailed response to this consultation in our capacity and experience as a learned society publisher.

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

The Royal Society of Chemistry has developed a policy position on Plan S that can be found here: <http://www.rsc.org/globalassets/04-campaigning-outreach/policy/research-policy/royal-society-of-chemistry-policy-position-statement-on-plan-s.pdf>. In addition to the points we raise in this position statement, we provide this more detailed response to the questions posed by cOAlition S in our capacity and experience as a learned society publisher.

To avoid stakeholders (funders, researchers, librarians, publishers) disengaging from the principles of Plan S, the implementation needs to be pragmatic. Therefore, we feel that the following points need consideration:

1. Clarity is needed as to:
 - a. whether and how the Plan S guidelines will be implemented in a coordinated fashion by the signatories to the principles, and
 - b. the role that cOAlition S will have in monitoring compliance and enforcing this.
2. Clarity is needed on the overall timeline of Plan S, as to:
 - a. how this timeline fits with the requirements for different stakeholders (funders, publishers, librarians and researchers) in the system and, related to this,
 - b. how realistic the timeline requirements are for effecting a transition to open access.
3. Revision of the requirements around hybrid journals to reflect the positive role that they can play in supporting the transition to open access.
4. Revision of the requirements around transformational agreements to reflect the positive role that they (in conjunction with hybrid journals) can play in accelerating the transition to open access.
5. Clarity is needed on how the Green open access route in practice will enable moving away from the subscription-publishing model in the transition to open access.

These points are expanded below.

1. Clarity is needed as to:

- a. whether and how the Plan S guidelines will be implemented in a coordinated fashion by the signatories to the principles, and**
- b. the role that cOAlition S will have in monitoring compliance and enforcing this.**

Since the release of the guidelines, UKRI, one of the signatories to the principles and the largest funding agency by research budget that has joined cOAlition S, has stated that *“the Plan S principles broadly align with current Open Access policies and will be considered as part of the UKRI Open Access Review. Final decisions on UKRI policies will be made via the UKRI Open Access Review”*, indicating that while Plan S principles will be considered, they are not the defined outcome of UKRI’s open access review.

Signatories therefore appear free to implement the guidelines in their own way by utilising aspects to reframe their open access policies, and this has the potential to introduce more, rather than less, complexity into an already complicated open access landscape. This could lead to divergence between funders and to multiple new country-specific requirements for researchers.

Hence, clarification is needed on cOAlition S’s role and ability to ensure that coordination happens effectively between funders, so as not to introduce more complexity for researchers and institutions.

2. **Clarity is needed on the overall timeline of Plan S, as to:**
- a. **how this timeline fits with the requirements for different stakeholders (funders, publishers, librarians and researchers) in the system and, related to this,**
 - b. **how realistic the timeline requirements are for effecting a transition to open access.**

Funders: cOAlition S has stated that “the timeline for implementation of Plan S will vary among member organisations. Implementation of Plan S will take place from 1 January 2020, having impact on either 1) existing grants, 2) new projects/grants or, at the latest, 3) new calls. cOAlition S

members should, at the very least, implement the new requirements in all calls issued after 1 January 2020.” It is unclear, at the moment, which option the signatories will implement and when.

Publishers: while the signatories are free to adjust the timeline for implementation, the requirements on Publishers around transformative agreements are specific. These agreements must not last longer than three years and, negotiations must be concluded by end 2021, suggesting that agreements could run from 2022 to 2025. From a practical perspective, some of our current contracts will not end until 2021/2022 and it is unclear at the moment whether there is an expectation that these negotiations are brought forward.

Librarians and consortia: since most publishers will be working to the usual renewal/negotiating cycles, the current timeline will potentially result in a big queue of negotiating parties, with large commercial publishers at the front of the line. It is unclear at the moment how librarians and consortia negotiators will resource this potentially intense period of agreement negotiations.

Researchers: implementation guidelines that are put into place will ultimately affect researchers, and processes should be developed in such a way that it is straightforward for researchers to apply them, without significantly adding to their workloads.

Review: considering the flexible timeline for funder implementation the suggested review of implementation in 2023 may leave only limited time to assess the effect of the guidelines on relevant research.

Hence, clarification is needed from the cOAlition S members about the timeline for implementation they are planning to use. From a practical perspective, it seems necessary that similar flexibility is built into the timelines for publishers and librarians to respond, and, for further evaluation to be meaningful, this should be reflected in the timeline for review.

3. Revision of the requirements around hybrid journals to reflect the positive role that they can play in supporting the transition to open access.

cOAlition S have stated that “grants can be used for financing APCs for Open Access publication in subscription journals (‘hybrid Open Access’) only under transformative agreements”, which themselves would only be acceptable during a transition period.

Hybrid journals - The potential role of hybrid journals as part of the solution to a full transition to open access has been largely disregarded. Publishers created hybrid journals to enable transition to open access, and hybrid journals are a vehicle for researchers who need and want to publish their research open access in a recognised venue. Hence, the amount of take-up is directly linked to the researcher and their drivers around open access. If more funders mandate open access, and more researchers therefore publish open access, the proportion of paywalled articles will decrease and a tipping point will be reached where a journal can viably flip to open access.

Our experience with hybrid journals - Where mandates and funding for open access exist, take-up is high: in 2018 (to end October) 65% of articles from the RSC’s UK authors were published via the Gold open access route and, of these, 70% were published in hybrid journals. Where take-up has been low, this has been due to lack of mandates (and in some case funding), rather than a failure of hybrids as a concept.

Hybrid journals can aid the transition to open access; therefore we would recommend that their role in the implementation of the Plan S guidelines is reviewed, particularly in the context of transformational agreements.

4. Revision of the requirements around transformational agreements to reflect the positive role that they (in conjunction with hybrid journals) can play in accelerating the transition to open access.

A transition to open access can be accelerated and supported via the use of transitional or transformational models, i.e. Read & Publish or Publish & Read. Such agreements, in conjunction with hybrid journals, are a fundamental part of the transition to open access if requirements are realistic.

Transformational agreements: our Read & Publish (R&P) model is a valuable mechanism to achieve a transition to open access and offers a way to transition library budgets from supporting subscription payments to supporting open access payments. They should be encouraged and enabled, rather than 'tolerated'.

Our R&P model has two parts: a fee for subscription content (read fee) and a fee that allows authors at the institute with the agreement to publish open access in our hybrid journals (the publish fee).

Pricing criteria for R&P can be transparent. In our case, the publish fee is based on a discounted article processing charge (APC) and the historical publication output of the institution in RSC journals. The discount is applied to the APC to manage the cost implications of the model. The read fee is calculated on a per article basis and so is directly linked to the actual amount of content behind our paywall. Therefore, there is a linear decrease of the read fee (for all our R&P customers) if the percentage of open access content in our hybrid journals increases, facilitating a smooth transition to open access. In addition, these agreements allow institutional customers to centralise the payment and management of open access within the institution, rather than add to the workload of individual researchers.

Our experience with transformational agreements: we have championed R&P agreements, and in two years have these in place with 50 institutions (49 in Europe and 1 in the US). This has increased open access outputs for those institutions, and in our journals. In Sweden and Austria we have 13 and seven institutes respectively on an R&P agreement. Sweden now publishes 90% of their output with us open access – and this is heavily concentrated in our hybrid journals (83% is published in hybrids). Austria is very similar (numbers as of end October 2018). The UK, as stated above, publishes a high percentage of open access content with us – supported by mandates and some R&P (12 UK institutes have an R&P agreement). However, we have just started our journey with R&P; although we have 50 institutes using this model, this represents a small minority of our customer base. We, and our customers, need time to put these agreements in place and continue to track their progress.

A smooth transition: The decision around flipping a journal should be based around the actual amount of open access content in the publication that allows for a sustainable transition to full open access. Where we have flipped journals without such a mechanism in place, we saw a 50% decrease in submissions and publications as a result, even with an APC well below the industry average for a full open access journal. Therefore, we would recommend that the requirements around including detailed plans for conversion are reviewed. If cOAlition S has concerns around double dipping, then we would recommend the inclusion of guidelines around this practice in particular.

Without revision of the requirements around transformational agreements, an unintended consequence could be that Publishers split their portfolio, offering subscription (rather than hybrid) journals and full open access journals. This would slow down the transition to full open access, rather than speeding it up, and should therefore be avoided.

Compliance terms and timelines around transformational deals need to be practical and realistic and work from the base that has been established. As the guidelines stand, no Publisher transformational deals currently in place would be compliant from 2020 onwards. In addition, it is not clear whether existing transformative agreements that run past January 2020 are compliant. Therefore, we would recommend that the guidelines around transformational deals are clarified and revised in perspective of their potential to further accelerate the transition to open access.

5. Clarity is needed on how the Green open access route in practice will enable moving away from the subscription-publishing model in the transition to open access.

Since Green open access is predicated on the existence of the subscription model, it is unclear how this route will aid a full transition to open access, even with zero embargo and in a compliant repository under the current guidelines. Publication in repositories tends not to aid visibility and discoverability of research – a fundamental aim of open science. The guidelines and technical requirements, as they currently stand around repositories, are onerous and very few current repositories would be compliant.

Therefore, further clarification is needed on the role of Green open access routes, and how such routes are suggested to aid a full transition to open access that moves away from the subscription model.

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

As is stated in the [position statement of the Royal Society of Chemistry](#), we as a publisher aim to lead the development of open access within the chemical sciences.

As outlined in points 3 and 4 of our response to question 1, a revision of the guidelines around hybrid journals and transformational deals could enable an acceleration of the move towards full open access.

In our answer to question 1, we have not addressed the role that preprint servers such as ChemRxiv (which is provided as a free service to the research community) can play in this transition. cOAlition S states that “*the posting of preprints of the completed manuscript in a repository or on a preprint server under a CC BY license is strongly encouraged. However, the posting of preprints is not sufficient to be compliant with Plan S.*”

It needs to be clarified why this route could not provide compliance, given that the fundamental role of preprint servers is to accelerate research by:

- enabling researchers to gather feedback and context from fellow scientists
- rapidly disseminating work to a wide audience
- establishing the priority and precedence of a discovery
- documenting research results for grant reviewers in advance of publication, and
- facilitating rapid evaluation of results

The above are all practices that aid a move to open science.