



Cambridge Submission to cOAlition S Consultation on Plan S

Introductory Statement

The University of Cambridge is committed to ensuring that our research, and the research that we publish, is robust, reproducible, relevant and world-changing. The dissemination of research to the widest possible audience of stakeholders, both within the UK and internationally, is fundamental to the mission of the University and its publisher, Cambridge University Press. We enthusiastically support advances and innovation in Open Research, including Open Access, and are pleased to see the UK at the forefront of this movement.

Cambridge has recently developed an institutional position statement on Open Research (see accompanying document). Our statement, which covers both the academic University and the Press, underlines our commitment to research excellence and to respecting and supporting the needs and important differences across academic disciplines.

The University of Cambridge is fully committed to a transition to Open Access and has a proven track record of working with funders to find constructive mechanisms to turn that commitment into reality. As such we look forward to collaborating with all stakeholders to establish approaches that meet our shared objectives for Open Access and which:

- Support research excellence at the highest international levels
- Work effectively for all academic disciplines
- Is financially sustainable for institutions and for high-quality peer review
- Allow an effective and smooth transition from existing arrangements
- Support a diverse ecosystem of international scholarly communication and doesn't create barriers to publication for those in developing countries
- Is supported by clear evidence and evaluation of impact and cost

This response has been shaped through discussion at Cambridge with academic leadership and senior representatives of the University Libraries, the Research Office and Cambridge University Press. Key messages have been developed through consultation with representative academic bodies, including the University's Research Policy Committee, Open Access Project Board and Open Research Working Group.

Even accounting for the existing transition arrangements set out, there is wide spread concern across the University about the speed and breadth of change required – including technical requirements, academic policy and practice, publishing models - to achieve compliance with the Plan S Implementation Guidelines from January 2020. This view is expressed across the academic disciplines and from the University Libraries and the University Press. More time, an evidence-based and pragmatic approach, recognition of subject variations and broad, meaningful consultation is essential to determine a sustainable transition to full Open Access.

The initial key messages from Cambridge are captured below, and the University would welcome the opportunity to follow up on any of the points raised.

As an accompanying document, Cambridge is submitting its Open Research position statement.

Q1 Is there anything unclear or are there issues that have not been addressed by the guidance document?

1. Speed of change required to achieve compliance with the Implementation Guidelines.

We believe that for the transition to be successful, a pragmatic approach is required to the speed of change required for authors, institutions and publishers to achieve compliance. We are concerned that the speed (and breadth) of change mandated by cOAlition S to implement Plan S from January 2020 has not yet been sufficiently tested, that it is unrealistic and carries risks of unintended consequences that will undermine research excellence at an institutional level, for the UK, and for research globally. Plan S does not include a risk assessment or a full cost benefit analysis. We believe these are essential components of any major change programme.

We do not believe it is feasible to complete the structural changes needed in time for the implementation date of January 2020. A few concrete examples:

- In less than 12 months, we would need publishers to have established their route to compliance and for key publishers to be ready to negotiate Read and Publish deals to meet the transformative criteria set out in Plan S. Many publishers, including Cambridge University Press, have already negotiated a number of Read and Publish deals (which cover the costs of open publication as well as access to journal content), but have not yet had confirmation whether all such approaches will be compliant. More time is needed for the transition. Publishers and libraries need clarity on the definition of what will be considered a transformative agreement.
- University libraries in the UK would need to know what level of government block grant for Open Access compliance will be available from April 2020 in order to negotiate new deals with publishers.
- New monitoring and compliance processes would need to be tried and tested.
- Significant and costly infrastructure and technical development would be needed to be completed, for instance to ensure compliant repositories.

We believe that the timeline and transition arrangements for Plan S need to be reconsidered to take account of these factors in order for its implementation to be achievable.

We are pleased that cOAlition S acknowledges that a longer time-frame will be required to identify what sustainable business models for Open Access monographs might be. This is essential. We believe that a longer time-scale is critical overall to ensure a successful and sustainable transition to full Open Access across the breadth of the scholarly communication landscape.

We believe Plan S should be subject to a full risk assessment and wide, meaningful consultation to fully understand the costs and to avoid unintended consequences for research in different disciplines, including the risk of collateral damage to smaller journals and publishers, like learned societies. Considering the breadth of change required, the timeline for implementation is not achievable and further thought should be given to transitional arrangements. Thought should be given to different approaches supporting the needs and established practice of different disciplines.

2. International Research Collaboration

Research is international. Academics at Cambridge believe it is important that researchers' career opportunities (globally) are positively supported by being free to publish in the high prestige journals that matter most in their research communities. Cambridge intends to sign DORA (Declaration on Research Assessment) in early 2019 – as one of the approved recommendations of the University's internal Open Research review last year - and has already begun to implement its requirements into criteria for recruitment and promotion. We would note, however, that top journals are known to the research community for more than just their impact factor and many remain desirable/necessary benchmarks for success and quality. Overall, more time is needed to effect the global transition intended by DORA. In this context, Cambridge academics have raised specific concerns about the potential risks of Plan S to early career researchers and express the belief that Plan S will hinder their career progression in a global market.

While estimates vary, Cambridge University Press suggests that the research communities represented by the signatories of Plan S account for 5% of the total global publishing output (by volume, although more by impact/quality). The University does not think this is sufficient market share for the Plan S signatories to change the global publishing model for scholarly communication, nor to dictate where researchers want to publish internationally. Plan S's goal for global change is laudable, but it is not realistic for part of Europe to go it alone.

The University recommends to cOAlition S consideration of the practical and supportive approach taken in the UK REF policy framework for Open Access, which works to mitigate these risks by allowing exceptions for publications with international authors. We believe Plan S Implementation Guidelines should allow exceptions as part of a package of transition arrangements in recognition of the importance of international research collaboration and the small number of funding bodies currently fully committed to Plan S.

3. Disciplinary difference and research excellence – one size for Open Access does not fit all

There are significant differences between methods of research and scholarly communication practice between academic disciplines. The University of Cambridge believes that research excellence is predicated on understanding and support for disciplinary difference and that in this complex ecosystem of disciplines and publishing practices one size model for Open Access does not fit all.

These range from the very intensive, highly collaborative and fast-moving research – where the open exchange of ideas through pre-prints and Open Access journals is already much the norm – to research that builds more slowly, often in a more individual scholarly tradition – where open practices are emerging but less mature, and where publication often relies on small, independent learned societies. For the arts, humanities and some of the social sciences, durability, not speed, is more important as the value of some publications (e.g. scholarly editions) last for decades. Similarly, options to apply CC-BY-NC-ND licences remains of central importance to this community. Concerns about Open Access to research arising from industrial partnerships is a continuing concern raised by some disciplines for example in STEM and law.

Plan S Implementation guidelines do not yet take sufficient account of discipline differences. Guidelines designed to maximise immediate public release of health-related research, for instance, may not translate as effectively to all other disciplines. There is a strong view in the University that one size for Open Access does not fit all. There is case for Plan S to further consider different approaches to nuance its implementation framework in respect of

discipline differences. In this way, institutions will be better able to engage academics in the transition towards the goal of full Open Access.

We believe Plan S Implementation Guidelines should include a more nuanced approach to take account of disciplinary difference, including different options for licences and the continuation of a strong Green Open Access repository environment, which is a fall-back for open sharing of publications by authors who do not have access to dedicated project funding or are not part of publisher Read-and-Publish deals. An erosion of the Green Open Access environment will disproportionately impact on researchers in the arts, humanities and some social sciences, and on early career researchers.

4. Maintaining the quality and diversity of the academic publishing ecosystem, including learned society publishers

The University of Cambridge's concerns about risks to academic publishing derive from perspectives of the whole University including its University Press. We believe the steps towards the goals of Plan S for Open Access should be managed with care and sensitivity to the needs of different research disciplines, to the quality, diversity and richness of academic publishing (including the place of learned societies), and to the overall pace of sustainable change to ensure an ongoing commitment to high-quality editorial standards and the support of research globally.

- A complete transition to global open access is likely to reduce journal revenues and will need to be managed carefully to avoid impacting editorial standards. There may be financial consequences that impact on the viability of some journals (the position of not-for-profit learned societies is a serious concern raised across a number of academic disciplines at Cambridge as these provide a vital service to many communities).
- We believe that the specific requirements of Plan S (zero-embargoes, CC-BY) mean that the Green Open Access model may not be sustainable, a view shared by a number of other publishers and learned societies. We believe a Green Open Access environment is an essential component of a fair ecosystem for scholarly communication, including those without direct access to external research grants and will play an important role in the transition to a full Open Access environment.
- Clarity is required on what will count as a 'transformative publisher' at the earliest opportunity.
- Cambridge University Press has embraced Read and Publish models to encourage Open Access, but not all journals and publishers will be able to thrive within such a model. Those with low output and those whose authors are not predominantly funded by research projects may struggle. This may consolidate the market in fewer, larger publishers.
- There should be no predetermined exit timelines from Read and Publish deals, including hybrid journals, before a proper review of their widespread impact and global uptake, as this will be essential to ensure an effective transition and to maintain routes to publication for all authors.
- Transparency on cost is attractive, but potential conflicts with competition law have not been sufficiently addressed.
- Currently most major publishers provide free access to journal content in developing countries. A parallel system, ensuring barriers to publication are not created, will need to be developed.
- The total cost of publication must be taken into account. This includes much more than the final journal output, to include cost of peer review (essential to quality scholarly outputs), rejection rates and the cost of publishing other content (like

editorials and book reviews) not directly covered by article processing charges (APCs).

We make these points at the same time as acknowledging and welcoming the commitment to fund research into alternative business models for learned societies. We strongly urge cOAlition S to ensure this work is given the time and stakeholder engagement necessary for such work to genuinely develop future possibilities in this landscape.

We strongly recommend that the Plan S Implementation Guidelines need mechanisms to ensure that Read and Publish deals (based on APCs) are not considered the only publishing model, as this form of arrangement is likely to be unachievable for the smallest publishers and is likely to force further consolidation in the market. A Green Open Access model is an essential part of the ecosystem. The UK has made considerable progress – at the forefront of Open Access – with policies that allow different lengths of embargoes, for instance for the arts, humanities and social sciences. This seems a reasonable part of a managed transition – working within different disciplinary needs - towards the Plan S goals for free and immediate Open Access.

5. Risks concerning costs

Cambridge wishes to highlight the likely significant increases in costs for research intensive universities and countries with a move to full and immediate Open Access models. As noted above the transition needs to be economically sustainable and this will require Gold Open Access as a key model, but Green should also be available for those journals and publishers that want to use this option. For universities the option of Green will help to moderate the increases in costs and is seen as an essential part of the mix. There is a serious concern that without additional funding being made available the increased costs for a university like Cambridge could see more funding being diverted from research to publication costs and potentially from HSS to STEM resources.

We also wish to highlight the costs associated with large scale rapid business change and the technical change to meet specific requirements, e.g. for repositories.

The University urges cOAlition S (and UKRI) to undertake a full cost-benefit analysis and wide-scale consultation with researchers, libraries, publishers and other stakeholders to help determine the right approach for the UK.

Q2 Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access to research outputs?

The University wishes to raise the following two additional issues concerning the mechanisms set out in the Implementation Guidelines for Plan S.

6. Technical issues concerning institutional repositories

The University of Cambridge has established the largest instance of the DSpace institutional repository software worldwide. This has been a critical part of complying with UKRI Open Access policies to date and with the University being able to maximise its profile internationally. Cambridge's institutional repository hosts Open Access versions of published research, electronic doctoral theses and research data; it is a central part of the University's Open Research infrastructure. In 2018 alone, there were over 2.2 million downloads from Cambridge's institutional repository and 9703 deposits of manuscript publications and e-theses; the repository hosts over 1,500 datasets (70% of which link to Research Councils UK funding).

We want to be able to continue to use an institutional repository to provide a positive route to achieve Open Access and to help deliver linked objectives for the long-term preservation of the institutional record of research. Plan S Implementation Guidelines do acknowledge a place for repositories; however, we consider that the Plan S policy and technical requirements risk undermining the role of institutional repositories and do not take sufficient account of their role in archiving and preservation of Open Research beyond Open Access.

The technical requirements for items to be deposited in repositories in XML means that currently all institutional repositories in the UK will be non-compliant. Either this points to heavier reliance on vendor/national/institutional repositories, or will require significant additional technical development at significant cost locally and nationally in readiness for January 2020. The goal of XML compliance is a good one, but it is not feasible (cost, time) to achieve this whole-scale across 150 UK repositories in this time scale, nor to effect the necessary developments with publishers for them to comply.

The University had already, before the launch of Plan S, initiated a review of its Open Research infrastructure. We have begun to think of future requirements for the institutional repository, including potential for end-to-end services inclusive of pre-print sharing and possible overlay journals. This is the sort of bold and imaginative discussion we want to have, particularly with UKRI, as part of the institutional solution for full Open Access designed in partnership with the academic community.

As a University with a leading academic press, Cambridge is in leading position to explore these possible solutions collaboratively with research funders. We would welcome the opportunity to take this discussion forward as part of the ongoing dialogue towards the goals of Plan S.

The timescale and requirements set out in the Plan S Implementation Guidelines should take better account of the technical development needed by institutions for repositories to be compliant. At the moment the pace of technical change required favours established commercial vendors, which will be at a considerable cost and may raise additional risks concerning ownership and preservation of research outputs, including data. There is also a high risk in this scenario of further concentrating the market.

We welcome the energising conversation prompted by Plan S and would like the opportunity to discuss with UKRI and other stakeholders the potential for bold infrastructure solutions that are designed in partnership with the academic University and the University Press.

7. Benefits of the UKRI REF Policy

The UKRI REF policy for Open Access has been highly effective at encouraging the transition to Open Access at the same time as working to balance disciplinary difference.

Cambridge looks forward to collaborating with UKRI during 2019 to review its Open Access policies, and urges cOAlition S to consider the learning that will come out of UKRI's in-depth process of consultation and evidence-gathering.

Respondents are also permitted to upload a supporting document to the Feedback Form. The University is attaching its Open Research Position Statement.