

Open access without loss of quality?

Open Access to scientific and scholarly publications enjoys broad support among scientists. However, the immediate and complete implementation of Open Access according to 'Plan S' on 1.1.2020 undermines existing policies regarding scientific and scholarly quality, has problematic consequences for young researchers and could get expensive – cause for great concern from the perspective of the Humanities as well. A response to the Dutch funding organization NWO from the Dutch humanities deans, as united under the aegis of the Dutch union of universities VSNU (a Dutch version of this memorandum was sent to the board of NWO in January 2019).

The increasing accessibility of scientific and scholarly publications through Open Access is a welcome development. However, the intentions of NWO to make Open Access compulsory, , in line with Plan S, for all research output from NWO projects from 1 January 2020 onwards could harm science and scholarship. The way in which Plan S, thus far pursued by NWO, wants to implement this policy - radically, without exceptions, non-gradually and without real consultation with those working in these fields and without serious discussion regarding the consequences of such obligations - does not attest to much trust in science or to the way the scholarly community is organised. In this memorandum, we discuss three implications that are especially relevant for the Humanities and then go on to address several points of a more general character.

[1] To begin with, it is problematic that this policy would render inaccessible for researchers with NWO and EU projects a whole range of relevant journals – including those from *learned societies* – and publishers. For the Humanities alone, this will mean that 88% of journals will be ruled out by Plan S – 98% even, for most prestigious journals – and here we have not even mentioned publications of books and articles in volumes.¹ This will become particularly problematic for young scholars who are especially dependent on NWO-research funding (VENI-VIDI-VICI, Top Talent). In order to build a strong Curriculum Vitae and qualify for international funding, a list of publications of articles in internationally recognized journals and books at international publishers is still of considerable importance in the fields of the Humanities. It is no coincidence that in the domain of Open Access publishing the popularity of 'hybrid Open Access' (that is, Open Access publications in established membership journals with normal quality check), has increased significantly. According to Plan S, this will be allowed only if these journals are on their way in attaining a status of complete (Gold) Open Access, and this is already a concession compared to initial plans that simply excluded 'hybrid Open Access'. It is not likely that the rest of the world will implement Plan S in the near future – the institutions behind Plan S represent merely a small part of the global production scholarly articles² - and within Europe Plan S is not supported by our neighbouring countries Germany and Denmark. It is thus an illusion to think that all the established journals will disappear in the short-term or that they will completely transform to Open Access according to Plan S. The only alternative available for scholars under Plan S will be new Open Access

¹ These percentages are derived from Table 1 in the Norwegian report *At the Crossroads of Open Access to Research: An Assessment of the Possible Consequences of Plan S for Publishing Quality and Research Environments*, November 8, 2018, <https://www.prio.org/Publications/Publication/?x=11146>.

² According to the previously mentioned Norwegian Rapport 3,3 % (p. 39). The secretary-general of LERU has stated that '*less than 5% of global research outputs covered by the Plan*'.

journals, but these will need time to build a reputation and be acknowledged, and in several areas they do not yet exist. In comparison with the original plan, the implementation plan (Guidance on the Implementation of Plan S) leaves some room for versions of so-called 'Green' Open Access – viz. making available the 'Version of Record' (VoR) or the 'Author's Accepted Manuscript' (AAM) publication in a repository – as a form of compliance with Plan S, but this covers merely a section of the journals concerned (and a small proportion of relevant publishers of monographs), namely only in so far as they follow the *archiving policy* 'Green' or 'Blue' in Sherpa/Romeo. Incidentally, guidelines for Open Access monographs and book chapters are not mentioned in the implementation plan yet, leaving matters unclear. The British Academy rightly points out that this situation is radically different from journal publication and that a swift implementation for this type of publication is unrealistic.³

[2] Second, in the Netherlands, but also elsewhere, the Humanities have made considerable efforts over the last years to standardise and improve their quality assurance. For this purpose, Dutch scholars have developed tools that are widely acknowledged and which are ahead of European standards (report *Quality Indicators for Research in the Humanities*, 2011, issued by the Royal Netherlands Academy of Arts and Sciences KNAW; and the system *Quality and Relevance in the Humanities* grounded in this KNAW-report). At the moment, these tools are only partially compatible with Open Access, because rankings from publishers and journals play a big role in this quality assessment instrument. Such indicators are of course not fixed indefinitely, and according to the *San Francisco Declaration on Research Assessment* (DORA) they must be employed with caution and cannot replace peer review of publications: this is also the drift of the previously mentioned KNAW-rapport. But especially in a field like the Humanities where bibliometric indicators are notoriously useless, in many contexts these indicators still serve as an indispensable proxy indicator for the quality and relevance of publications. Plan S renders the use of such indicators practically impossible, even though a usable alternative is not yet in sight. The claim, defended by some in the debate over Open Access, that it does not matter where scholars publish their results, is vulnerable to many objections, but first and foremost it ignores these recent developments with regard to quality indicators in the Humanities in the Netherlands, as well as the efforts of the KNAW and universities (including the Humanities discipline-consultations from the VSNU) in this area.

[3] Third, in the Humanities there are types of publications that are the result of scholarly research but that reach a broader public outside academia (e.g. broadly accessible historical studies, annotated translations of classical texts and exhibition catalogues). These so-called 'hybrid' publications have several relevant features: they are usually brought to the market by publishers who are not purely academic; the public wishes to buy them as attractively printed hard-copy books; and it is often impossible to imagine how they would become Open Access, at least not in the foreseeable future. The transition to Open Access according to Plan S renders it impossible for scholars in NWO-projects to opt for these types of publications. Given that the choice for these publications is a particularly appropriate and obvious way of reaching a broader public, the conditions set by Open Access are in this case problematic and paradoxical.

³ *Science Europe's Plan S: making it work for all researchers*, november 2018, p. 2: https://www.thebritishacademy.ac.uk/sites/default/files/British_Academy_paper_on_Science_Europe_Plan_S.pdf.

[4] The implementation plan for Plan S states that Open Access journals ‘must have a solid system in place for review according to the standards within the relevant discipline, and according to the standards of the Committee on Publication Ethics (COPE). Details on this must be openly available through the website’. In itself this is good news, but it takes considerable time and energy to develop such a system for the whole new range of Open Access journals that are required for the Humanities, given that it seems unrealistic that many established top-journals will transition to Open Access. Furthermore, a restrictive publication policy for these new journals will lead to relatively high Article Processing Charges (APCs), which is in tension with Plan S’s intent to put a ‘cap’ on these costs. And in itself, the business model of Open Access contains an incentive to publish as many articles as possible. There have already been intense conflicts amongst editors of several Gold Open Access journals in cases where editors felt obliged to advise against what they perceived to be too liberal or even unethical practices of publication.⁴ How these tensions will be resolved remains unknown. The implementation plan does not address this problem. One can only hope that this problem will not be ‘resolved’ by a means that has been opted for in certain circles, namely the abolishment of peer review altogether (and it is not unimaginable that this route will be chosen). In times of *fake news* and disdain for science (e.g. climate change denial) credible scholarship and scientific knowledge is of crucial importance and a possible transition to a publication culture without quality assurance is potentially extremely harmful for trust in science, and is highly problematic from a political, epistemological and ethical perspective.

[5] The implementation plan further mentions that Plan S-approved Open Access journals ‘must provide automatic APC waivers for authors from low-income countries and discounts for authors from middle-income countries’. This too sounds good, since it responds to criticisms regarding the negative effects of Open Access for researchers from these countries, but again it remains uncertain how this would play out in practice. It will in any case lead to an increase of APCs for European scientists – ultimately a subsidy from European funds and universities to researchers across the world, the scope of which is unclear and has not been discussed in either the scientific or political community.

[6] Other financial implications of Plan S have not been anticipated and thought through. It is unlikely that top international journals will disappear any time soon or that they will *en masse* become Open Access. Universities and libraries will not simply cancel their subscriptions. In the meantime, the costs of APCs will rise significantly. The implementation plan of Plan S calls for research into a reasonable amount (and, conceivably, a maximum) for APCs. But a reasonable estimate or calculation is still lacking. For any other policy domain, this sort of “leap into the void” would be unthinkable.

Our plea mainly is primarily aimed at ensuring that the implementation of Open Access be done carefully and with thorough consultation with all parties involved, while also acknowledging all potential implications. The fact that NWO is pressured by Plan S is understandable, but the universities and the KNAW have their own responsibility in this regard. Scientists and scholars in the Humanities are not opposed to a transition to Open

⁴ See Lynn Kamerlin e.a., ‘Response to Plan S from Academic Researchers: Unethical, Too Risky!’, *Betterscience.com* 11 September: <https://forbetterscience.com/2018/09/11/response-to-plan-s-from-academic-researchers-unethical-too-risky>.

Access per se. But the requirements that 100% should be the goal *no matter what* is foolish, as is the introduction of a form of shock-therapy prescribed because otherwise things take too long. It is of great importance that other values, such as established quality standards, will not be harmed in this process due to absolutization of the value of Open Access. Intended and unintended implications for science and scholarship should be recognized and evaluated, and emergency-procedures should be put in place in case things go significantly wrong. It should also be possible to make the process more gradual and to leave certain types of publications, albeit temporarily, ‘untouched’ by the policy changes – especially for academic fields such as the Humanities where big profits for publishers are uncommon, and where on the other hand a radical change of publication culture, as proposed by Plan S, will lead to serious problems. Ultimately, further discussion – within the Netherlands in NWO, VSNU and KNAW – is necessary, not merely concerning the implementation plan but also concerning the principles of Plan S in general.⁵ Scientific and scholarly quality and credibility should by all means remain of central concern.

As we await a continuation of this discussion our recommendations to the Dutch funding agency NWO (and indeed to other relevant European funding agencies) at this point would be as follows:

- Allow hybrid Open Access for the time being, at least for the Humanities (the conditions stated in the implementation plan are unrealistic).
- Allow, at least for the Humanities, ‘Green’ Open Access without restrictions (including archiving of preprints and including archiving under embargo; the latter is typically not problematic for the Humanities).
- Make room for ‘Platinum’ Open Access (Platinum OA is better than Gold OA!).
- For the time being, in the implementation of Plan S, exempt book publications from the Open Access conditions.
- In the implementation of Plan S exempt so-called ‘hybrid’ publications (scientific and scholarly publications accessible to broader public) from the Open Access condition (the practice of dissemination already has satisfying results and there are no problems in this area that Open Access should resolve).

⁵ A technical point not yet mentioned in this memorandum but worthy of attention is the fact that the implementation plan recommends the Creative Commons License CC BY 4.0 as default. This allows its users certain freedoms, e.g. to use material from Open Access publications for commercial purposes, and to adapt or elaborate Open Access texts without acknowledgment. A license of the type CC BY-NC-ND 4.0 does not allow such freedoms, and would be preferable. For more information see the report from the British Academy, *Open Access and Monographs. Where Are We Now?* (https://www.thebritishacademy.ac.uk/sites/default/files/British_Academy_paper_on_Open_access_and_monographs-May_2018.pdf), British Academy 2018, p.4.