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Plan S and publishing: reply to Lehtomäki et al. 2019.

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We thank Lehtomäki et al. (2019) for widening the discussion of the Plan-S open-access initiative (https://www.coalition-s.org) in their response to Burgman et al. (2018). They provide useful links to Plan-S documentation. They are disappointed by the focus of our position, which we took to clarify a point central to the discussion of open access that we believe has received too little attention, namely, equity of access to publication.

The revised Plan-S implementation guidance mandates that from 2021, scientific publications that result from research funded by public grants must be published in compliant open-access journals. We agree with many points they make, including the aspiration for ready access to scientific results produced with public funding, a desire for more affordable publication, greater

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transparency in publication costs, and use of the moniker, *subscription model*, rather than *reader pays*. We are fully aware of and share their concerns about the restrictions that arise from the subscription model. But we disagree about the merits of alternative approaches to achieving a better system.

Lehtomäki et al. believe the current subscription model, including the hybrid option, is expensive and unfair. They claim that Plan S "partly addresses the equity issue," that "Plan S can act as a catalyst for a transformation toward a more equal and inclusive publication system," and that, "if implemented with care, it can also precipitate a more fundamental transformation in scientific publishing…". Their claims raise 3 issues: the high cost of publication, access to the literature, and equity of access to publication. The 3 are clearly related.

When the cost of publication is borne by readers, all 3 issues are problematic. Lehtomäki et al. suggest that under Plan S, regulation of author publication charges (APCs) may address the high cost of publication if the regulation of fees is effective. Exactly how such regulation would work is an open question. The approach in Plan S is to consider capping open-access author fees. Lehtomäki et al. suggest this cap may " …regulate what is considered an acceptable level for such fees and therefore limit the overall costs of academic publishing." Equity remains a problem when we have APCs for all. The suggestion that Plan S may precipitate a more equal and inclusive publication system seems to be based on hope rather than empirical evidence. Mandates to publish in fully open-access journals will drive up submission to these journals. Increasing demand to publish papers in these journals may create upward pressure on APCs. Early-career researchers will be affected most. Financially, they will be less able to afford publishing in leading journals with higher APCs and professionally they will be less able to afford publishing in lesser-known journals with lower APCs. Waivers of APCs will neither eliminate inequity between countries nor address inequity within countries. It seems unlikely that all academia, funding organizations, and governments internationally will agree on appropriate regulation of APCs. How is equity to be achieved in concrete, practical terms? This question may have answers, but they are not yet apparent or agreed on.

It is possible that Plan S will solve these 3 problems with appropriate balances and regulations. But the case in favor of Plan S seems to be more a matter of hoping it will solve the problems rather than providing a concrete mechanism that will achieve the desired outcomes. To reiterate, we believe, as do others (see https://sites.google.com/view/plansopenletter/open-letter and https://forbetterscience.com/2018/11/06/plan-s-protest-open-letter-signed-by-hundreds-of-scientists/), that Plan S may result in substantial inequities. We do not advocate sticking with the current system indefinitely. Rather, we advocate retaining hybrid journals until there is a clear path to a better system, one that does not further exacerbate existing inequities. Lehtomäki et al. raise many good points, but their responses have not diminished our

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concerns about equity for both authors and readers. We agree with their observation that the risks associated with the schedule of implementation and coordination are substantial. We agree too that we will need to "continue demanding that fair and transparent waiver programs be in place." We differ with them in the view that Plan S should be implemented before these systems and guarantees are in place. We must recognize that no proposed solution makes publishing free or resolves the fundamental issue that costs create disadvantage. We fear that careless and overhasty application of Plan S may amplify existing inequities and create new ones. If things go ahead as planned, we sincerely hope we are wrong.

Literature Cited

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