

Plan S Response from the Regional Studies Association 8th February 2019

General Statement

The Regional Studies Association (RSA), is a non-profit international, multi- and inter-disciplinary learned society in the social sciences bringing together researchers working at the regional scale in economics, geography, political science and planning. We are based in the UK but with activities globally.

The Association publishes four hybrid journals and, since 2013, a gold open access and Plan S compliant, generalist journal – *Regional Studies*, *Regional Science*.

We have read the proposals set out by the cOAlition S funders in Plan S with interest noting the intention to achieve open access to all cOAlition S funded journal publications by 2020. We also note the commitment to achieving the aims of the San Francisco Declaration on Research Assessment (DORA).

We agree that a research and scholarly communications system for the 21st Century should make the findings of academic research available to those who seek them and that the quality of research should be judged on its intrinsic merit and not the location of its publication. However, we believe that Plan S proposals, as currently stated, risk unbalancing the research ecosystem and fracturing the research community in a way that is not ultimately beneficial for research in general or for the social sciences in particular.

Specifically, we argue that by ignoring the important public benefit and community building functions of learned societies, the plan's proposals risk degrading the quality of cOAlition S funded research and threatens to cede the mediation of scholarly research from the academic communities producing this research to private commercial interests.

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

Process

- The RSA is concerned that the current consultation is not meaningful because the architects of Plan S have made clear that the **10 Principles are “sacrosanct”**. This precludes an open discussion and suggests that the consultation is not a serious exercise for shared learning and understanding which, if accurate, is disappointing.
- The RSA regrets the **lack of engagement** by cOAlition S with key stakeholders including the learned societies and in particular with the social science, arts and humanities societies (SSAH) who are likely to be adversely impacted by Plan S. The RSA relies in large part (67%) on income from its publishing activities which it uses, along with conference and membership income to support its wide variety of activities.

The RSA is a key part of the research landscape in its inter- and multi-disciplinary field. It operates globally and is a key defender of its subject area which, as it is not a core discipline, and therefore significantly benefits from being championed by a territorially and institutionally neutral body. The Association's support for research and public understanding in this field are widely known and acknowledged, including by meta-level organisations such as the Directorate-General Regional and Urban Policy at the European Commission.

- There does not appear to have been enough consideration of **adjustments to the current system of hybrid journals** to warrant wholesale change of the modus operandi of scholarly publishing.
- Hybrid journals are not necessarily in opposition to the principles of Open Access, as assumed in Plan S. In our field only around 40% of published content has funding of any kind and less than 15% of our content is currently covered by cOAlition funders. Across our four hybrid journals less than 10% of articles are published gold open access although more will be made available via the green route. This would make entering a transformational agreement extremely problematic. However, a “mirror” journal approach would guarantee the availability of journals for researchers with Plan S funding.
- There is an inadequate rationale for the assertion that **mirror journals will not be eligible** under Plan S which is unhelpful and unprofessional in an open process of engagement between stakeholders across international research. This matter should be clarified and explained as a matter of urgency.
- The RSA is placed in an impossible position by the imposition of a **timeline for change that predicates failure of compliance and/or a failure to the community (both academic and policy/practice)** who founded us and whom we support.

The Association has four hybrid journals which collectively publish much of the regional research globally. We have a responsibility to the research and wider community to protect and develop the quality and impact of these journals. We need time to consult with our own communities (who are wider than just cOAlition S funded researchers) to assess for any unwanted and unforeseen outcomes from change.

- It is impossible to plan for transition when what is required in a **“transformative” process is poorly articulated**. An example of this lack of clarity is the **changing stance on APC standardisation/caps**.

*The RSA differs from many social science societies in that it has published a Plan S compliant journal – *Regional Studies, Regional Science* - for several years. We are still learning about the economics of this journal and the care needed in managing APCs and associated waivers. What can be shared however, is that in spite of its success as a journal, it does not make a surplus. The Association receives no royalty income against this journal. Fully open access journals are difficult to manage in fields where research*

may not be funded and where APC allocations may not be prioritised. The number of waivers that are necessary can also be financially burdensome and the RSA has used its funding to support early career researcher access to publishing their research in the journal.

- It seems that the Ten Principles are variously interpreted by funders and we understand that each funder in the cOAlition has explicit freedom to implement the principles as they think fit. Academic research and scholarly publishing are now global activities, and this will make an extremely confused landscape for researchers, societies, repositories and publishers to operate in.

We are asking for -

- a relaxation of the terms of the consultation in a future round allowing for more granular discussions with all major stakeholders (including societies in SSAH) and opening the way for discussions of a more pluralist approach than that proposed in Plan S
- new thinking about the contribution of hybrid and mirror journals to achieving open access goals, particularly in the case of SSAH
- reconsideration of the proposed timetable
- a clarification of the position on APC standardisation
- publication of a full risk assessment of possible outcomes post-implementation of Plan S as currently conceived
- consultation on the next iteration of Plan S and prior to any implementation phase

Learned Societies as Providers of Public Goods

- The RSA and other societies play a vital role in **representing the research of their constituent academic communities** within and beyond academia.
- This is done not only through publishing activities but also through creating, supporting and maintaining communities of practice which bridge gaps between the production of academic knowledge and its application. The RSA, like other social science societies, runs an extensive **knowledge exchange programme** supporting a range of activities translating research into practice. Annually the Association funds three “[Policy Expos](#)” which are pathways to impact outside academia. See *Footnote 1* These activities are supported by the surpluses generated by the Association’s publishing programme. The rapid transition to the scholarly publishing system outlined in Plan S would severely constrain these activities, leaving an open question as to how these communities might be supported in the future.
- The RSA is a **global micro-grant provider**. We have given £866,000 over the past five years in 173 awards. (Largest grant - £13k, smallest - £500). Government research councils, charities/foundations are not able to administer such small amounts of money into research communities; indeed, in the UK, the ESRC has cut its small grant

funding. Often RSA funding is used as pump priming with additional funding being sought to supplement the “high quality” society funding.

- We have also provided support, in partnership with a publishing company and the ESRC, for two studentships. This is part of a suite of activities to support new researchers. Our £10k [Early Career grant](#) is regarded in the field as career-starting and this funding is not readily available elsewhere.
- It is also worth noting that in making these awards the Association uses a Research Committee of world-leading researchers in the field of regional studies and science.

We are asking for recognition and understanding of:

- **the important role of learned societies in supporting their research, policy and practice communities and consideration of how to secure this under Plan S**
- **the key role of societies in providing multiple routes to grant funding in ways that currently are not available from major funders**
- **the value of expert communities in managing the challenges to disciplines and fields**

Footnote 1 – The RSA is one of three academic associations engaged in building the #EURegionsWeek [University Sessions](#) and early career [Master Class](#) working directly with many EU institutions; we are co-organisers of the EU Cohesion Policy conference along with member states; we co-host the [Smart Specialisation](#) conference with the Smart Specialisation Unit of the Joint Research Council in Seville. These events are valued by both academic and policy communities for enabling vital exchanges between producers and users of academic research. The RSA is also an active contributor to government consultations at all levels and in many territories.

High Quality Publications

- Learned societies including the RSA add value to the publishing system. We bring together authors, peer reviewers and editors through our many **networking activities** including conferences. These networks enable high-quality peer review, improving and adding to the quality of published work and also **facilitating additional published outputs** such as editorials, commentaries and debates etc.
- There is currently no clear alternative business model available to social science societies that is not subscription-based, and this has led to a number of ideas coming into circulation. These include **submission fees** as currently used in some economics journals to help address the issue of **high volume of submissions and consequent demand on editors/referees and high rejection rates** that are common in the social sciences. Additional barriers to publication for early career researchers and researchers from emerging economies would be regrettable. It must be acknowledged that the maintenance of high standards of peer review and editing is not cost-free.

- It is worth noting that **some content in our journals would not be subject to an APC** such as book reviews, editorials, comments etc and these pieces then become an additional burden on the cost of the APC or lost to the field which will, of course, be consequently degraded.
- Concerns have been expressed by our editors and members about a rapid shift in publishing protocols because of a danger that hybrid social science journals will not be able to afford to commit to transformation, subsequently opening the door to **predatory publishing** with consequent risks for lower quality thresholds and fraud on researchers
- We are concerned that we will be unable to transform our journals to Plan S compliant open access in the prescribed, or perhaps any timeframe. If this is the case our journals will cease to be able to publish some high-quality articles funded by the cOAlition. This will **lower the perceived value of the journal** for authors unaffected by Plan S restrictions but whose appointments and promotions may still hinge on achieving high-quality journal publication. Furthermore, the quality of debate in the journals may be diminished if those articles go into mega-journals where linkages between articles are less well articulated.
- As a learned society we are concerned about the lack of author choice to publish in established high-quality journals. There is currently little awareness of Plan S within the wider academy and a reaction from the researcher community should be expected.
- It would be less than ideal if Plan S forced the closure of high-quality journals in the social sciences and promoted a shift to mega-journals where communities of practice and understanding would be lost. This would leave researchers to work individually or to re-create lost communities.

We are calling for understanding that:

- **journals and society journals in particular are more than just a collection of articles and subsidiary pieces. They represent communities of researchers and routes to impact. Disruption to this established and well understood form of publishing will necessarily have consequences that will be hard to foresee.**
- **SSAH fields are different from the STEM model based on which Plan S seems to have been designed and therefore will need further consideration.**
- **not all the content in SSAH journals attracts an APC and this content needs to be provided for or there will be degradation of debate in our fields.**
- **we might expect a growth in risk from predatory publishing and this would need to be monitored to prevent abuses**
- **Plan S is not yet a global phenomenon (and may not become one) and it operates in an international research context and should avoid doing harm outside its immediate sphere of influence**

Diversity and Inclusivity

RSA members have raised the following concerns with Plan S in relation to diversity and inclusivity

- **Career Stage** - Plan S is expected to have detrimental effects on early career scholars whose careers will still depend on building strong publication records – inevitably the universities will take time to adjust to new publishing practices and in the global market this may count against researchers funded by the cOAlition S. Plan S proposals also risk **breaking down connections between new researchers** as they choose between different research blocs and practices within which to develop their careers. The RSA plays a critical role providing opportunities for Early Career Researchers to develop their networks. The incentives to do this across the Plan S divides are less clear.
- **Geography** – The RSA currently publishes a journal with a unique mission. [Area Development and Policy](#) addresses regional issues in emerging economies (the greater BRICS) allowing researchers to write in their own research tradition. For example, Latin American authors may use their traditionally more descriptive style, Chinese authors may reference Chinese theoreticians not known in Western traditions. Articles normally have referees sourced both from the authors' locale and from an international perspective. It is the case that access to APCs is not even across the world. Plan S should recognise this.
- It is important that there will always be **an environment in which there can be experimentation with new publishing initiatives** such as **Area Development and Policy** and that **support can be found to allow such start-ups**. **Area Development and Policy** has established itself quickly in 3 years to have a sustainable flow of submissions. It has been welcomed by the research communities working on and in emerging economies as making a unique and valuable offer.
- The RSA and other societies function as international communities. These activities bring together researchers from different traditions and are vital in driving innovation. See *Footnote 2*
- The RSA is concerned that a shift towards an author-pays model as proposed by cOAlition S, rather than acting as a catalyst for change, may create a **two-speed research community**. This appears likely because even within Europe there is no consensus on the principles of Plan S. The likelihood of the two largest research producing nations, China and the USA, joining is currently unknown. Furthermore, within the social sciences, there are substantial numbers of independent researchers and researchers operating out of institutions with low library budgets who will effectively be locked out of writing in author-pays journals. The situation may lead to **fracturing research communities**. It should be acknowledged that many publishers offer LDC and LLDC APC waivers. The waivers and partial waivers do vary but offer real support to authors with funding difficulties.

- Finally, there may be **inequities of publishing choice** where collaborating researchers have funding coming from different sources and this should be considered, as it may, unfortunately, lead to insularity rather than global collaboration as different models get established.

We are calling for:

- Reflection and action to ensure that Plan S does not have negative impacts on relevant diversities including career stage, geography of the researcher and related writing traditions
- A scholarly communications system that welcomes and fosters new forms of communication and has funding available within it to make these possible. It is worth noting that presently much publishing innovation is directly funded by publishers – Plan S should not lead to an outcome where this kind of critical innovation is impeded. Examples include funding of [Cross Ref](#), [ORCID](#) as well as innovations developed by publishers including the [Digital Science](#) products owned by Holzbrinck publishers), [Altmetric](#), [Readcube](#), [Figshare](#) etc
- Recognition of the work of societies in building valuable and research-intensive global collaborations
- The importance of not fracturing research communities
- A statement from cOAlition S on APC waivers and how they will operate including how they will be funded

Footnote 2 – The RSA has members in 77 countries and has held conferences globally in 27 different countries on five different continents in the past five years. The RSA is committed to representing the work of this diverse community especially through the launch of its new journal ***Area Development and Policy*** (see above).

Openness

- The RSA works with its publishers to provide free and discounted APCs to those who need them and free access to some publications. The Association publishes [Regions](#), an online magazine designed to bring regional research to a much wider audience. This is made freely available and promoted as widely as possible around the globe to academics, policy makers and practitioners. The RSA also participates in the UK [access to research](#) scheme which provides free access to RSA journals at public libraries in the UK.
- The Association, through its journal, [Area Development and Policy](#) has opened pathways to publication and readership to authors from, and to those writing on, emerging economies. This experimental journal was made possible through the stability offered by the subscriptions model.
- Plan S may have the unwelcome effect of forcing **homogenisation in scholarly publishing**.

- The RSA works hard following publication to **promote articles to wider audiences** using social media, conference presentations and engagement of authors in teaching, masterclasses etc.
- The RSA publishes a gold open access journal – [Regional Studies, Regional Science](#) which is published with a CC BY licence. In some parts of the field of regional studies, the **CC-BY licence** can be problematic for reasons that were well rehearsed at the time of the Finch Report in the UK and those arguments will doubtless be made again. Their repetition should be regarded as indicative of their ongoing validity.
- The RSA is a member of a number of **philanthropic schemes** providing access and research support to researchers outside of the global north: [Research4Life](#), incorporating HINARI, AGORA, OARE and aRDI; [INASP](#) and the Programme for the Enhancement of Research Information (PERii); the Essential Electronic Agricultural Library ([TEEAL](#)); the Association of Commonwealth Universities [Low Cost Journals Scheme](#); Journal Donation Project ([JDP](#)); Special Terms for Authors and Researchers ([STAR](#)) which assists individual authors from emerging regions.

We bring to your attention:

- **that there continues to be a lively debate about the usefulness of a narrow CC-BY licence approach across all areas of science. The issues with this licence type are well rehearsed and still of validity. Exceptions in SSAH could be considered.**
- **the question of how Plan S will ensure that academic research is well represented beyond publication, a role which the societies currently fill?**

Conclusion

The RSA wishes to stress that a one size solution is not going to fit all circumstances, and what will work in STEM may not be appropriate in the social sciences, arts and humanities. There needs to be more dialogue with the research community, with the learned societies and with the commercial publishers. The timing of proposed changes needs to be carefully considered because of the high chance that rigidity on this alone will cause unhelpful and unnecessary disruption.

The RSA considers the following to be significant:

- **Open access seems to have become a binary topic – one is for it or against it. This is unfortunate because it would better be regarded as on a sliding scale – there are multiple possible routes to openness and a more broadly couched consultation would have been helpful in exploring other options**
- **The subscriptions model has provided helpful stability within the generally slow-moving world of societies and associations. It is not straightforward to see how a new system might continue to achieve this without unhelpful competition which will impede currently open and collegiate societal relationships**

- Plan S risks undermining a global system of research, instead creating one broken into different regional configurations.
- Learned Societies are a key part of the research landscape. They were set up by researchers for their own needs and are led by researchers. In the case of many SSAH societies they are managed with volunteer labour. These organisations perform services that researchers' value and their contribution and the harm from their diminution or loss should be assessed.
- There needs to be a full risk assessment of what might happen if Plan S is implemented in the current form and timetable, paying attention 1) to consequences in the current research landscape (including consideration of the future of learned societies) and 2) to potentially undesirable outcomes. It is worth bearing in mind that as Warren Ellis has noted "systems are always more complex and fragile than you think they are".

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