

# cOAlition S

Oslo, 15. March 2024

## Response to the new strategy from Plan S – *Towards Responsible Publishing*

The National Board of Scholarly Publishing (NPU) is a national committee in Norway mandated by The Norwegian Ministry of Education and Research to advise the government on issues concerning scholarly publishing. In this capacity, we wish to provide feedback on the draft proposal for a new strategy from CoAlition S – *Towards Responsible Publishing*.

According to our understanding, the consultation on the draft proposal was scheduled to run from November 2023 until April 2024. We had planned to prepare a draft response from our Board to be discussed in our meeting on 26th of February. However, a consultation about the procedure with The Research Council of Norway and Robert Kiley in CoAlition S led to a request for our response already by the 31st of January. Subsequently, we were informed that Research Consulting Ltd. in collaboration with CWTS Netherland were designated by CoAlition S to design an online survey in 2024, offering an alternative option for us to respond. We suspect that we are not the only ones that are slightly confused here. Considering these uncertainties, we have chosen to send our input directly to the secretariat of CoAlition S and hope that our arguments below will be given due consideration.

### **Who is involved in the consultation?**

We have been unable to find a detailed description of the consultation process including how you plan to involve research institutions and other relevant organizations. The statement on your webpages is that “this process offers researchers the opportunity to voice their opinions and contribute to the development of a proposal that serves their needs”. An important question for us is how you will consult the formal organizations in which researchers collaborate to influence scholarly publishing priorities and strategies. In Norway in 2018, the research-performing organizations were informed about Plan S but could not influence its first aims and strategies. However, the Ministry and its directorates, including the Research Council of Norway, have made the institutions cover the increasing costs of the transition by themselves. As we see it, it is time to consult the research-performing organizations in each involved country before a unified and evidence-based strategy for the further progress of OA is laid down for them by the research-funding organizations.

## The National Board of Scholarly Publishing - Norway

### Addressing the impact on costs and research quality as well as the degree of openness

We are pleased to see that CoAlition S acknowledges some of the problematic aspects of the APC model, however, there are also other challenges to be faced. A more comprehensive approach based on the experience so far is called for. We are therefore surprised that the steps towards formulating a new strategy for Plan S are taken before learning from the results of the first strategy.

In parallel with the consultation on the new strategy, CoAlition S has initiated a “study to assess the impact of Plan S on the global scholarly communication ecosystem” which is to be performed by Scidecode Science Consulting. There are also already several independent studies appearing in peer-reviewed journals that find, apart from a striking increase in the degree of OA publishing in the ‘ecosystem’ since 2018:

- A further concentration of the market power (as measured by their shares of the published output globally) of the main commercial scientific journal publishers.
- A decrease in research quality as a result of the comprehensive increase in APC-based Gold-OA publishing.
- The expensive publish- and read contracts continue although they were expected to be transformative.
- The so-called peer review crisis resulting from an unforeseen dramatic increase in scientific publishing worldwide, particularly in APC-based publishing.

A working group representing and advising the research-performing organizations in Norway has recently formulated a new *Strategy for scientific publishing after 2024*<sup>1</sup> in which the five trends above (including a significant increase in OA publishing also in Norway) are discussed and a new strategy is formulated that differs from the former governmental strategy (2017) in two important ways: 1) This time, the research-performing organizations and the elected researchers in the national disciplinary committees organized by Universities Norway were involved in developing the strategy. 2) A vision for future publishing was formulated that added costs and research quality to the success criteria (only one criterium, full OA, was used by the government in 2017):

*We wish for publication channels and publishing services that ensure high quality and immediate open access to the research - with reasonable costs that correspond to the services that the publisher provides. High quality implies professional quality assessments and feedback, that the publishing channel's routines comply with professional standards to accept the publication of research results, that research integrity is safeguarded, and that the publication processes are efficient and ensure the completion of the research in a good way. We wish for a variety of publication channels that are under the control of the research communities.*

### Addressing the challenges of a community-based scholarly communication system

We highly support the intentions in the draft of a scholar-driven publishing system, but to achieve this aim we need to address several challenges. The new *Strategy for scientific publishing after 2024* mentioned above has led to recommending a Diamond OA strategy along with RRS as the main alternatives for the future. However, there are pending issues related to both these models. For the

---

<sup>1</sup> <https://www.openscience.no/strategi-norsk-vitenskapelig-publisering-etter-2024>

## The National Board of Scholarly Publishing - Norway

diamond model we need to address the legal basis (ownership), the economic basis and the quality criteria needed for selecting fully subsidized Diamond OA in the present journal market where the Diamond alternative is marginal so far. The RRS-strategy contributes to enabling researchers to freely choose the publication channel, but also have its challenges. Institutions are largely left to themselves. Based on our experience, it seems to be easier for larger institutions than small ones to implement RRS; we really need collective action on a higher level and incorporation of secondary publication rights in national and international regulations. On the other hand, we see publishers adapting and responding to RRS by charging for article evaluations. These important questions are not addressed by the draft for a new Plan S strategy.

New important questions arise from the draft, such as identifying high quality community-led journals in the present market of scientific journals. We know they exist. Several such journals are published by Norwegian scientific societies with or without collaboration with their counterparts in the other Scandinavian countries. However, the Research Council of Norway recently ceased supporting several journals in the latter category. This decision seems to be contrary to the draft for a new Plan S strategy.

Additionally, we assert the importance of establishing an international, non-commercial, and community-driven register for scientific publishing channels. This registry would serve as a curated list of recommended publication outlets, acting as a gatekeeper against unreliable sources and those journals and platforms operating in the gray-zone of good editorial practices. Leveraging Norway's and Finland's existing infrastructure for community-led journal evaluation, the [Norwegian register for scientific journals, series, and publishers](#) and the [JUFO portal](#), we propose their expansion into an international tool that may aid and collaborate with the [Directory of Open Access Journals](#).

### Beyond the mandate of cOAlition S

The original Plan S observed the global market of scientific publishing and built unified strategies to change it. We are surprised that the draft for the new strategy now – despite the increasing problems we all observe in the same global market - shifts attention from this market to practices within the research communities. There is a strong need to move forward and develop a new legal and economic basis for the future market of scientific publishing. Instead, the strategy now turns to the research communities and intervenes in the research process and how quality is ensured. We see this as a significant and problematic shift.

Scientific journals have two major tasks, to fulfil the research process by involving the research community in quality assurance and editing, and to disseminate the results. OA is primarily about the latter task. We strongly recommend that cOAlition S keeps its focus on efficiently making new knowledge available and leaves questions about how research is organized and performed to ensure quality to the research organizations and the communities that contribute to the contents and quality of journals.

In Norway, the responsibility for ensuring research quality rests with the research-performing institutions who in practice are aided by the scientific societies working across institutional borders. The Research Council of Norway does not have the tradition nor the mandate to instruct the researchers and their organizations in how to perform research and organize quality assurance. Hence, we question whether the cOAlition has the mandate to intervene in how research is organized and performed in the involved countries.

## The National Board of Scholarly Publishing - Norway

### Linking the strategy for open access to *one* model (open peer review)

A clear intervention into how research is organized and performed is the proposal in the draft to recommend only one model for peer review, namely open peer review. We ask for the evidence-base for this recommendation.

In the draft strategy, the COVID-19 pandemic is used as an example to emphasize the need for faster and more efficient publishing models. However, we have also observed challenges related to the early sharing of research results prior to peer review. For instance, we have seen examples where media outlets reported on research findings from preprint archives without clarifying that the findings had not undergone peer review. Furthermore, during the pandemic, the Norwegian Electronic Health Library (Helsebiblioteket.no) with the national responsibility for quality assurance of research information in the health sciences found that among the many thousand articles published every week with COVID-19 appearing among the keywords, only a minority were relevant and very few brought new and valid results.

In general, it is essential to recognize that the experiences from the COVID pandemic and the use of pre-print archives may not be universally applicable across all areas of research. While acknowledging the usefulness of early sharing and open peer review, it is therefore not advisable to universally apply these methods and use them as *the only recommended path to a desired publishing landscape*. This is particularly evident given that such an approach could contradict the principle 5 in your strategy, which advocates for "open dialogue with all scholarly communities, funders, and other stakeholders to respect bibliodiversity, disciplinary differences, and the specificity of epistemic traditions." Failing to accommodate diverse approaches in the strategy therefore risks alienating support from the research community. The concept of open peer review is not universally endorsed across all fields of research. Criticisms include its potential to compromise confidentiality and privacy, discourage honest feedback, create additional workload and pressure, introduce new forms of bias and influence, and lack suitability or feasibility for all disciplines or journals. Furthermore, from the perspective of authors and reviewers, it may lead to dealing with a larger and ambiguous set of comments and versions.

From our viewpoint, a new strategy should acknowledge that different fields have different norms and expectations which may render open peer review unfeasible in certain contexts and therefore not regard open peer review as the only gold standard. As the proposal now is formed, we dread that the whole enterprise might fail.



Tanja Storsul  
Chair – The National Board of Scholarly Publishing

Vidar Røeggen  
Secretary