

Dear cOAlition S Executive Steering Group

AN OPEN LETTER FOLLOWING THE CONSULTATION ON TRANSFORMATIVE JOURNALS

Support for Transformative Journals welcome but changes are needed to ensure take up

In our [submission](#) to your original consultation in February 2019 we explained how Springer Nature is dedicated to accelerating the adoption of Open Access (OA) publishing and Open Research practices more generally. This remains the case, as does our willingness to be a committed partner for cOAlition S funders in achieving this shared goal. Indeed, we have been doing this for longer and at greater scale than anyone else - Springer Nature having published almost one in four of all immediately-published OA research articles ever published.

We were therefore pleased to see cOAlition S embracing the concept of transformative journals as a way to build on existing journal heritage and significantly speed up the transition to full, and immediate, OA publishing. When we first [floated this idea in May 2019](#), it was because we believed that, by harnessing the investment, track record, editorial expertise, and the trust the research communities have in these long-standing journals, the transition to OA could be significantly accelerated and enable many of them, including highly selective ones such as *Nature*, to get on the path to OA.

While we are supportive of the vast majority of the criteria proposed in the consultation, we are concerned that, if the transformative journal concept as envisaged by the cOAlition is applied in full, Transformative Journals will not deliver the full transition we believe is possible. We feel duty bound, having proposed this approach, to share our concerns with you now in an open way.

1. The timelines proposed and the rates of OA transition are unworkable and could be counterproductive

In our earlier responses to Plan S, we repeatedly and publicly committed ourselves to transitioning all of our journals, our hybrid portfolio of 1900 journals (Springer Nature-owned and society-owned) along with *Nature* itself and all other Nature-branded journals, to immediate, full OA for all primary research and we will do everything we can to make this a sustainable reality in the shortest possible time. But the **speed** by which this can happen is not solely in our hands; it is also hugely dependent on the rate at which other funders, institutions and consortia commit to supporting Gold OA, as a zero embargo green OA approach will undermine the sustainability of journals as they transition and hamper the move to open science.

Currently, EU/ERC and cOAlition S altogether account for under 7%¹ of global research articles. This has barely increased in the year since cOAlition S launched, with funders joining in 2019 only accounting for a very small portion of published research².

¹ Clarivate Analytics: The Plan S footprint - Implications for the scholarly publishing landscape, Feb 2019

² For example, according to data from Dimensions, the World Health Organisation publish c2,000 articles per year, Vinnova c900, and the South African Medical Research Council c700

This equates to an annual growth rate of articles funded by cOAlition S of somewhere between 3-4%, which is well below the 6% growth rate expected this year for the research article market as a whole. Therefore, the rate of growth of EU/ERC and cOAlition S is not even adequate to keep pace with this total article growth rate. Given that the global share of cOAlition S funded research is declining in real terms, a transition which expects publishers to increase the share of OA articles in their journals by 8 percentage points p.a. is not sustainable, and could be potentially damaging for researchers and the whole research ecosystem.

What these numbers clearly show is that the current proposed Transformative Journal target requirements are not realistic. To put this in context: According to Clarivate InCites, research funded by the National Institutes of Health (NIH) currently accounts for 4% of published output, NSF 3%, and the Japan Society for the Promotion of Science 1%³. A growth of 8 percentage points in a single year, as required by the proposal, would require, in one year, the two largest US funders and the largest Japanese funder to all switch to mandating and providing adequate funding for immediate OA - and an equivalent scale of change each year thereafter. No one we talk to thinks this is possible let alone likely.

A similar picture appears if we are realistic about the pace of uptake of Transformative Agreements (TAs). These are complex and take time to agree as they need to be designed and built to take into account the specific starting position and goal requirements of each institutional consortia/funding partner⁴. Even in the countries of existing cOAlition S members, take up of TAs (some notable exceptions aside) is still low. We hope this will change soon, but even if it does, it will not be adequate to drive growth in even a single year at a rate of 8 percentage points p.a. across all journals and thereafter, as data from InCites again shows that even the UK only accounts for 7% of all articles, Germany for 6%, India for 5%, and Australia for 4%⁵.

Multiple countries, and with all publishers on board, would have to completely switch each and every year which again appears to be unrealistic at the moment, no matter how much you and we might desire it. Publishers cannot make this happen, they can only promote the benefits and meet the demand that is there, which we see many publishers, in addition to ourselves try to do.

Furthermore, requiring publishers to make an entire journal OA, when demand is only at 50%, means the remaining half of all authors currently choosing to publish in that journal (many of whom will have chosen it because, in their view, it is the best journal for their research) will no longer be able to do so. Turning away authors for financial reasons goes against everything we, as a global publisher, indeed all reputable research publishers, stand for and something we will not do – we are here to serve researchers in all disciplines and in all countries. We cannot place authors in a situation where they could be unable to publish in the most suitable journal for purely financial reasons. Similarly, by not being able to comply with these requirements, your own authors will see their publishing options drastically curtailed. I am sure that we, cOAlition S and the vast majority of research publishers all care deeply about ensuring the research system works for the benefit of all, so we have to find a solution together to overcome these issues and reach our joint goal.

2. The waiver requirements are unsustainable

At Springer Nature we have established waiver policies already in place⁶ for researchers unable to access APC funding and for those authors based in the world's lowest income countries as defined by the World Bank. As the largest OA publisher we have given more waivers than anyone else. For obvious reasons, this applies only to authors seeking to publish in one of our 600 fully OA journals. For authors without OA funding and seeking to publish in one of our other journals, they are able to do so for free via the subscription route.

³ Clarivate InCites; articles and reviews 2019YTD

⁴ <https://www.springernature.com/gp/advancing-discovery/blog/blogposts/transformative-deals-substantially-aid-the-transition-to-oa/17033546>

⁵ Clarivate InCites; articles and reviews 2019YTD

⁶ <https://www.springernature.com/gp/open-research/policies/journal-policies/apc-waiver-countries>

The proposal to require publishers to offer waivers for publishing in a Transformative Journal is not workable as it would result in much more research being published for free, undermining the sustainability of those journals and so something we and other publishers would not be able to do on the scale required to meet cOAlition S's requirements. If we, as publishers were required to pass this financial burden onto those that do fund APCs it would place too high a burden on those organisations that are committed to funding OA, as meeting the costs for publishing all research would then fall on their shoulders during the transition. Ultimately, it would mean those organisations that are committed to Gold OA having to support twice the content they were funding at the point of the flip which is neither fair, reasonable nor sustainable.

We are also very concerned that the availability of waivers for Transformative Journals would operate as a disincentive for any further organisations to fund gold OA, and could even cause some existing supporters of gold OA to reduce their support.

Setting the barrier for entry so high will mean many journals will immediately have to rule themselves out of committing to be a Transformative Journal which prevents the very transition that is your and our goal.

We genuinely want to find a sustainable route to OA for our hybrid and highly selective journals, indeed for all hybrid and highly selective journals no matter who the publisher is, but the thresholds put forward make this impossible.

Authors will be affected. Currently 75% of cOAlition S-funded research is published in hybrid journals.⁷ This is not an accident. This is the result of informed decisions made by the authors. So this matters to cOAlition members, to the researchers and research they fund, and to the publishers that serve them. If the requirements for transformative journals are so stringent as to make publishers not participate, then this would have a seriously negative impact on journal choice for these cOAlition S-funded authors, and their co-authors, many of whom are currently not supported by their funders, institutions or consortia.

And international collaboration will be negatively impacted. Based on Clarivate InCites data, the international collaboration share for articles with at least one EU author is 50%. When looking only at the main cOAlition S funders this increases to c.60%. It's likely that at least some of the international collaborators of these papers will insist on publication in journals that do not fulfil cOAlition S' criteria. If the mandate is enforced, collaboration between cOAlition S funded researchers and international colleagues could be damaged and ultimately reduced over time.

We have to avoid all these unintended consequences. What is needed is a set of challenging, yet achievable, metrics that the majority of journals can embrace if we are to drive real and sustainable transition to immediate OA publishing of all primary research.

We propose the below as an alternative timeframe and workable set of metrics:

1. Year-on-year growth of OA content at the same rate as the increase in global research supported by funders and institutions committed to funding Gold OA.
2. Journals to be flipped when OA content reaches 90%.
3. Progress to be reviewed in 2024, as per cOAlition decision to review progress more widely, and commitments adapted accordingly then in light of progress to date.

⁷ Statistic taken from accompanying data for the "Plan S Gap analysis report", within file "1_OA_options_usage.csv", using data for "all disciplines". <https://zenodo.org/record/3549020#.XekyFVX7TmE> –

To achieve 1 and 2, as set out in our communication in May, we, in turn would further commit to:

1. Actively promoting to authors, funders and institutions the many benefits of publishing OA.
2. Expanding transformative deals as rapidly as institutions/consortia/funders allow.
3. Increasing levels of transparency of pricing and associated publishing services.
4. Working with Plan S to convince more funders, institutions and consortia to support Gold OA.

These requirements are ones to which we could sign up and which we believe could get the wider endorsement required to be really transformative.

To be clear, if cOAlition S agreed to such an alternative which could achieve large scale adoption, we would commit to putting all Springer Nature-owned journals publishing primary research – our hybrid journals (a portfolio of 1,900 titles including some society-owned ones), *Nature*, and all 31 Nature Research Journals – on the path to full OA.

We are committed to this journey and we urge you to give careful consideration to our recommendations.

Yours sincerely,



Steven Inchcoombe
Chief Publishing Officer
Springer Nature
www.springernature.com



CELEBRATING 150 YEARS / 1869-2019