



## **Marine Biological Association written submission supplied for the consultation on 'Guidance on the Implementation of Plan S', February 2019.**

Written evidence submitted by Dr Matthew Frost, on behalf of the Marine Biological Association.

### General comments

1. The Marine Biological Association (MBA) established in 1884 is the world's longest-running marine biological society dedicated to the promotion of marine biology. As a leading Learned Society the MBA's mission, as defined and recognised by Royal Charter, is "to promote scientific research into all aspects of life in the sea and to disseminate to the public the knowledge gained". The MBA achieves its mission in a number of ways from running internationally recognised education and training programmes to speaking out as the 'voice of the marine biological community' on issues of policy relevant to marine biology and the marine environment. We work closely with our members (currently c. 1600) who are drawn from 37 countries and range from professional marine scientists to interested amateurs. We also have thriving young persons and student membership categories.
2. The MBA is based at its Citadel Hill Laboratory in Plymouth where many highly significant scientific discoveries have been made and where today about 90 staff continue to deliver an internationally-renowned programme of scientific research along with a dedicated knowledge Exchange programme.

### MBA Publishing

3. The MBA has published the Journal of the Marine Biological Association since August 1887. Originally set up to provide members with "notes and reports concerning the work of the Association, the Journal was transferred to an external publisher in 1937 and since then has become a well-respected journal within the field of marine biology. JMBA is a 'hybrid' journal with Gold OA publishing offered on request.
4. In January 2016 the MBA re-launched its other scientific journal, Marine Biodiversity Records (MBR, originally established in 2008) as the Association's first online Gold Open Access journal. This move to a Gold Open Access model was undertaken as part of the MBAs support for Open Access and freedom of information wherever possible whether

published information or data. The MBA also hosts national and European networks that facilitate accessibility to marine datasets.

5. In addition, The Marine Biologist is a popular magazine that since 2013 has been provided twice a year to members and also used for wider promotion of the Association.

### MBA and Plan S

6. The MBA is therefore committed to making not just publications available, but also data and information wherever possible. The proposed model suits certain types of organisations such as universities, which receive large amounts of money via grant funding (which will in future include an extra component to cover APC charges) or have the capacity to establish alternative arrangements for publishing their work instead of working with a commercial publisher. For smaller organisations like Learned Societies this is simply not the case.
7. **Global research / developing countries:** It is very unclear how Plan S will work at an international level, particularly in relation to developing or undeveloped countries. For a discipline like Marine Biology, a great deal of research is undertaken at the international rather than the National level and the JMBA publishes research from a huge range of countries including many which are classified as developing or undeveloped. It is noticeable that for our Gold OA journal (MBR), a big challenge has been being able to provide enough 'waivers' for authors without compromising the financial viability of the publication. Funding for APC charges via research grants is not available in the same degree for authors in developing countries as for the UK and forcing journals from a 'hybrid' to a Gold OA model will preclude a lot of this type of international research. One of the main positives of the current system is often massively overlooked i.e. its democratic nature (anyone can publish on the merit of the research, rather than on access to funding being a key factor in order to publish in 'compliant' journals).
8. There is an equal challenge when it comes to **early-career and retired** researchers. As a Learned Society the MBA works with individuals from school, through student and early-career through to those who are retired. All of these individuals can benefit from being able to publish in our and other marine journals on merit. Under the new system it is highly unlikely that they would be able to publish in the academic literature unless they had access to large amounts of private funding. Currently these individuals also benefit from bursaries and other benefits of being a member; these benefits also are at threat from journal income that previously supported the development of the discipline.

The MBA would suggest therefore that an alternative plan be developed with Learned Societies to address these real concerns whereby the new Plan would work large wealthy institutions but would be a real disservice to the wider community within a scientific discipline. **The MBA would very much like to be part of this discussion.**

### Questions on guidance

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

### **Implementation**

- There is currently little information on the implementation of Plan S via Plan S signatories. It is not clear for example what the mechanism will be for UKRI to provide funding for APCs. I know this is not the purpose of this document but some examples of how the plan will be implemented would be useful. The fact there aren't any examples (or links to examples of implementation strategies) leads to concerns over the viability of the Plan S strategy 'in the real world'.

### **Timing**

- The timeline appears to be very unrealistic. Like many other Learned Societies, we are currently reviewing our Journal model but any change to the existing arrangements is likely to take a few years due to existing contracts. This issue is supposed to be covered in the 'transformative agreement' arrangements but even here there is a very tight timeline. For Learned Societies that deal with publishers, boards, members and others, the process by which a journal undergoes significant changes, up to and including switching publishers can be quite drawn out.
- The MBA strongly supports accessibility to information and data and also supports the San Francisco Declaration on Research Assessment (DORA). It is not clear however how Plan S is addressing the central concerns of DORA, which is the inappropriate and unhelpful use of metrics such as Journal Impact Factor (IF). The proliferation and increased specialisation of journals with the resulting need for ever more submissions and a 'publish or perish' mentality within academia with an undue focus on IF continues to be at the heart of a growing problem in academia. The Plan S coalition supports DORA but Plan S is not designed to address these issues. More time is needed therefore for the principles of DORA to be implemented ahead of Plan S implementation.

2. Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?

- Consideration should be given to differing options for funding bodies and hence for those receiving funding. Academic disciplines differ greatly in how work is produced and communicated as well as the types of funding available. Plan S currently appears to be a 'one size fits all' approach that is likely to be much easier to implement for certain disciplines and subject areas than for others.
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