

05 December 2019

## **STM comment on cOAlition S Guidance on Implementation - Addendum**

STM publishers support all models and approaches that have the potential to lead to a more open scholarly communication environment and a greater empowerment of researchers. In this context, we welcome the additional clarification from Coalition S on transformative journal arrangements.

Publishers continually strive to ensure that research is read, validated critiqued and built upon. We actively support scholarship through the development of new models of Open Access, Open Data, research metrics and a wide variety of initiatives which enhance collaboration, inclusiveness and transparency. We therefore welcome all practical solutions which achieve the careful balance between the maintenance of the highest standards of quality, integrity, and long-term sustainability of publishing research with the diverse OA requirements which researchers have across different disciplines.

STM is looking forward to submitting our input into the community consultation. The practicalities stemming from the criteria for transformative journals should not be underestimated, and we encourage all stakeholders to consider them carefully.

STM agrees that targets and milestones are necessary to measure the transition to Open Access, but mandating them may run counter to our overall shared goal. With only 6% of all journal articles connected to funding by the current cOAlition S membership, the specified targets will be difficult to achieve and support without a significant number of new funders and institutions willing to financially support the transition to OA. Setting a blanket 'tipping point' does not recognise the differences in funding which exist across research communities. Some journals would be able to transition to full OA when they reach a 50% penetration rate, however others would not prove sustainable with the remaining 50% made up of many unfunded authors.

It is important to recognise that the timeline for the transition to OA is not wholly in the purview of publishers to dictate. Publishers can (and already do) put in place mechanisms to support the growth in Open Access journals, but funders and researchers drive the market and the overall demand for OA.

Publishers are fully committed to unlocking the benefits of a more transparent scholarly communications environment, and are already working in a number of ways to provide reporting that is meaningful. This includes the development of workshops and cross-industry collaborative approaches which will explore and provide a range of mechanisms to demonstrate transparency. However, delivering the additional reporting requirements mandated in the Addendum will prove incredibly challenging both in terms of their accuracy, and in terms of the additional administrative costs. These outlays will be particularly burdensome for smaller or society publishers who not have large infrastructures to support such tasks.

STM and its members continue to stand ready to work with cOAlition S and individual funders to make a vision of a high-quality, sustainable, and more open scholarly communication environment a reality. We look forward to submitting our input into the community consultation and continuing further constructive dialogues.