The European Physical Society (EPS) subscribes to the principle that the results of publicly funded research must be widely available to the scientific community and to the general public, with no paywalls for authors and readers, and across all scientific disciplines. The physics community has been a pioneer of Open Access (OA) and open repositories, and for many years, the EPS has advocated a responsible transition to OA publishing which preserves high-quality peer review, secure archiving, and a strong and successful scientific enterprise. The position of the EPS has last been made public in 2013 in a statement issued jointly with the European Association for Chemical and Molecular Sciences (EuCheMS)\(^1\). This statement serves as the benchmark against which the EPS evaluates Plan S.

The EPS welcomes the initiative “cOAlition S for the Realisation of Full and Immediate Open Access”, and supports the rationale on which it is built.

At the same time, the EPS is concerned that several of the governing principles proposed for the implementation of Plan S are not conducive to a transition to Open Access that is well-managed and preserves the important assets of today’s scientific publication system.

- The core values added to the publication process by quality journals need to be protected. In a gold-standard OA environment, these are professional editing, independent peer review, and reliable long-term archiving. A forced transition to full OA over a short period of time risks to undermine the economic viability of many journals, causing irrecoverable damage to established, well-functioning networks of editors and referees. Publication in OA repositories can only complement, not replace publication in peer-reviewed outlets.

- Diversity and competition need to be preserved. Learned societies and other not-for-profit publishers contribute significant diversity to a publication landscape dominated by a small number of commercial publishing giants, but operate with limited financial reserves, and are particularly vulnerable to economic damage from rash transition scenarios.

• Scientific publishing is a global undertaking. Non-European authors account for a significant fraction of articles published in European journals today, but have generally no access to dedicated OA funding. Plan S can only succeed when it is coordinated with major stakeholders outside Europe. A Euro-centric implementation risks to accentuate knowledge divides, both inside Europe and between North and South.

• Plan S limits researchers' freedom to choose where to publish, which is inherent in the current culture. This restriction is difficult for the scientific community to accept while academic recruitment and career advancement are still based on publication metrics and journal prestige rather than on the scientific merit of individual publications.

• Hybrid journals do not represent a sustainable business model. However, they are a valuable – or even necessary – instrument to manage a smooth and successful transition to full OA for limited transition periods.

The EPS welcomes and supports Plan S as a medium to long-term vision, but is concerned that a rushed enforcement may cause irrecoverable damage to the European academic publishing system and, in particular, to not-for-profit publishers. It is also noted that Plan S is presently supported by a minority of funding agencies from EU Member States. The EPS recognizes that its reservations are addressed in part by the implementation guide “Making full and immediate Open Access a reality” published on November 27, 2018, but urges cOAlition S to engage further with funding agencies, publishers – both not-for-profit and commercial – and the scientific community towards a plan that can be supported by all stakeholders. In this process, scientists are most credibly represented through the learned societies. The EPS, as the top-level representation of the European physics community, stands ready to work with cOAlition S on a successful and sustainable implementation.

**About the European Physical Society (EPS)**

The EPS, founded in 1968, is a grass roots, member-driven learned society, providing a European forum for physicists representing scientific, topical, and national interest. The EPS presently federates 42 national member societies, which in turn represent more than 130'000 individual members; about 40 Associate Members, which are mostly major research institutions, universities, and industry; and more than 3'500 Individual Members. The seat of the Society is in Mulhouse (France).