



# SSPH+

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Universität Zürich

**ZHAW**

Zürcher Hochschule für  
Angewandte Wissenschaften

Dr. Angelika Kalt  
Director SNSF

Sent via email  
Distributor: see bottom

Zürich, 15.11.2023

## Reg: Opposition against policy to ban Special Issue articles from APC support

Dear Dr. Kalt

As mentioned in our email on 1.11.2023, we read the following information from SNSF's PB News 52 with great concern:

*In June 2023, the Presiding Board meeting discussed whether to exclude all articles in special issues from the SNSF's Open Access (OA) funding. Due to questionable quality assurance practices around exponentially rising numbers of special issues put out by two OA publishers (MDPI and Frontiers), the SNSF might want to stop funding the Article Processing Charges (APCs) of special issues, as stipulated in the current OA funding regulations. The decision was postponed and a legal assessment requested ... etc.*

In the attached catalogue of arguments, we provide the reasons for our fundamental opposition to treat Special Issues (SIs) and Regular Issues (RIs) differently.

Our arguments underscore what Matthias Egger correctly emphasized in his "Distinguished WLS Lecture" about "The good, the bad and the ugly" of Open Access publishing: that there are no "black-and-white" indicators that can separate the good from the rest in order to tackle the current crisis in the publishing business.

Contrary to this nuanced approach, the SNSF is now considering using one single indicator to separate the bad and ugly from the good, namely whether an article is published in a SI or not. Our arguments explain why the SNSF's funding strategies should not use this indicator, but should instead focus on the true issues in quality-based publishing: threats against editorial independence, integrity.

We highly appreciate the invitation of Tobias Phillip SNSF from 3.11.2023 to participate in the ongoing discussions. Prior to providing our arguments, we will disclose our backgrounds and the expertise that force us to react publicly to the SNSF proposal:

- We are long-standing Editor in Chief (NK) and leaders of the independent Editorial Office (AB until October 2023; CW since May 2023) of the not-for-profit Swiss School of Public Health (SSPH+). Together, we manage the two SSPH+ journals: [JPH](#) and [PHR](#).
- On behalf of SSPH+, NK and AB led a two-year in-depth tendering and evaluation process to select an Open Access publisher for the SSPH+ journals. Through these experiences, we have gained insight into the practices, strategies and contracts of Springer, BMC, Frontiers, and others.
- The tendering process led to the unconditionally supported decision of 22 out of the 24 SSPH+ Foundation Board members representing the 12 Swiss universities to choose Swiss-based Frontiers as the new publisher (from 2021).

- Many of the 250 SSPH+ faculty members from these 12 Swiss universities contribute to journal special issues as editors, authors and reviewers.
- Through our collaboration with both Springer (11 years) and Frontiers, we have also gained deep insights into the strengths, weaknesses and practices of a (non-transparent, traditional and global) hybrid publisher, and a (fully transparent, young and Swiss-based) Gold OA publisher.
- Together with the six Editors-in-Chief of the two journals and the Editorial Boards of senior editors (another nine internationally respected scientists), we have decades of experience in launching SIs as a highly successful strategic tool to promote public health sciences. Many other scientists in Switzerland are in the same situation, be it in the role of editors or authors in many journals.
- We were recently invited to participate in a discussion of the swissuniversities Open Access strategy. We realized that the proposed policy frontally contradicts four of the six objectives listed in the current draft version (30.10.2023). Specifically, it undermines the proposal to “negotiate with publishers for a sustainable transformation” (Objective 2); it jeopardizes the aim to “establish a supportive regulatory framework” (3); it hinders the “broadening of research assessment criteria to ensure high-quality OA publications” (5); and it distracts from rational steps toward “monitoring the OA transformation in terms of publications and costs” (6). The proposal also ignores all guiding principles mentioned in the very thoughtful draft.

Regarding the last point, let us emphasize that our Editorial board members strongly believe that it is not the role of a publicly funded national authority to intervene in editorial strategies of independent scientists. Instead, SNSF should focus on scientific quality and integrity. As highlighted by [Hansen et al. \(2023\)](#), authors from SNSF, and others, there is no simple indicator currently available to identify quality and integrity.

Our catalogue of arguments will frequently refer to [Hansen et al. \(2023\)](#), since the proposal to exclude SI articles from further OA APC support largely hinges on misinterpretations of this article. We hope our catalogue provides useful insights and convincing arguments to oppose the SI proposal.

With best regards

Prof. em. Nino Künzli, Chair SSPH+ Journals and Editor in Chief, Int J of Public Health  
 Dr. Christopher Woodrow, Managing Editor SSPH+ Journals, Swiss TPH,  
 Dr. Anke Berger, former Managing Editor SSPH+ Journals, Swiss TPH

Copies / bcc / forwards to:

- Matthias Egger, President SNSF Council,
- Milo Puhan, President SSPH+ Foundation,
- Sandra Nocera, Administrative Director SSPH+,
- Antoine Flahault, Chair SSPH+ Directorate
- Suzanne Suggs, Vice-President SSPH+ Foundation and Member Editorial Board Int J Pub Health (OA journal of SSPH+)
- SSPH+ faculty
- Swissuniversities OA team
- Other interested leaders

# TEN ARGUMENTS AGAINST THE SNSF PROPOSAL TO NO LONGER FUND OPEN ACCESS ARTICLES PUBLISHED IN SPECIAL ISSUES

The catalogue addresses ten arguments and conclusions in more detail. In doing so, it demonstrates that a simple assessment of the journal publisher or whether an article is published in an SI or RI is unsuitable for use as an indicator of quality.

## 1. “One-size-fits-all” ignores diversity across scientific fields

To begin, we will disclose two issues:

- First, our arguments relate in essence to the publishing world in the multidisciplinary fields of public health sciences. The proposed “one-size-fits-all” policy against SIs ignores the known heterogeneities in publishing cultures across science disciplines. The use, motivations, challenges, strength and weaknesses of SIs versus RIs may vary greatly across fields. Thus, our insights and defense of publishing SIs in public health sciences may not necessarily be applicable to other fields of science. No single SI regulation will ever be a good fit for all. With a simple focus on global data aggregated by publishers, Hansen et al. do not investigate discipline-specific indicators.
- Second, we focus on Switzerland, given that the proposed SNSF SI policy would primarily affect access to APC support for scientists with SNSF grants. To the best of our knowledge, there is zero evidence that Swiss-based scientists publish lower quality papers in SIs and higher quality papers in RIs. Do SNSF-funded scientists contribute to the global strain discussed by Hansen et al.?

At an overarching level, the proposed policy does not account for diversity in scientific publishing, and is therefore unlikely to be effective in tackling the publishing crisis.

## 2. The continuum between “Special Issues” and “Regular Issues”

The black-and-white attempt of SNSF to distinguish articles from SIs and RIs implies that there is a clear operational definition of the two categories. In reality, this is not the case, and SNSF would therefore face challenges to distinguish “good” from “bad” SI publications. There are various examples of situations where SIs and RIs are not clearly distinguishable:

- a) Since most journals – particularly the OA journals – have moved to “continued publishing”, the concept of “issues” is in a phase of dissolution. Typically, once an article – both in SIs and RIs – gets accepted via peer review, it is published. Most journals have replaced the traditional “printed edition” with online-only. The concept of “issues”, and by extension “special issues”, has therefore become somewhat nebulous. Henceforth we assume for the sake of clarity and our arguments that SNSF considers a SI to be a collection of articles published via a “special call”.
- b) Sometimes, editors might strategically decide to bundle a couple of independently submitted papers into a “special issue” where a topic is getting attention (e.g. due to an emerging public health crisis). How will SNSF deal with authors who agreed *after* being accepted via peer review to become part of such a “special issue”, post-hoc? What if the editors have not even asked authors for their agreement to feature in a “special issue” cluster? In the times of printed issues, the bundling of articles in (any) issue was a classic strategic responsibility of editors, partly maintained in the new world of “non-issue-publishing”.
- c) Many SI calls might have start and end dates for submissions. Thus, editors may receive submissions from “latecomers” that fit perfectly into the (now closed) call. Given the “continued publishing” model, editors might decide to include such latecomers in the SI. Will SNSF treat the APC coverage of a (successful) “latecomer” differently depending on whether or not editors included it in the SI?

- 50 d) What about editors strategically featuring special electronic “e-issues”? With html links,  
 51 grouping (past) publications on related topics provides an excellent tool to promote thematic  
 52 clusters that a journal (or journals) might have published during the past few months. Will  
 53 inclusion in an e-SI put authors at risk of being excluded from APC support?

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### 56 3. There are different types of “Special Issues”

57 It is unacceptable to put all “Special Issues” on a “black list” without knowledge of their origin  
 58 and the related governance activity. Interestingly, Hansen et al. refer to the fact that SI  
 59 governance may vary. However, since they abstain from addressing this issue further, we will  
 60 do so here. Based on governance practices, there are at least four types of SI call:

- 61 a) Some “special calls” - the default in our journals - are initiated by independent leading  
 62 scientists to promote relevant research topics, to raise attention for the field, or to link a SI to  
 63 themes featured at an annual society conference. High quality peer review standards and  
 64 editorial procedures for SI’s may be exactly the same as those adopted for RI’s. (This model  
 65 is utilized by the SSPH+ journals, and many other society and publisher-owned journals.).
- 66 b) Calls are proposed and run by a “guest editor” who is less familiar with the procedures and  
 67 standards of a journal. Thus, the (still independent) peer review process may be looser (or  
 68 more rigid) than in case a), dependent on various factors.
- 69 c) SI topics may be identified by the non-scientific publishers’ staff, but a leading scientist  
 70 might then be invited to act as guest editor and to name co-editors or handling editors to  
 71 guarantee independent peer review procedures. Those invitations might target a small  
 72 number of leaders personally, or might be sent via mass mailing to the email inboxes of  
 73 many scientists.
- 74 d) Other SI’s are initiated, run and handled by staff hired by the publisher (see also points 5  
 75 and 9), possibly guided by AI, to identify topics that are profitable for the publisher.

76 It is clear from the above that conflicts of interest (and possibly quality) vary widely– again on a  
 77 continuum – according to the SI governance. Discrediting and excluding SI articles outlined in a)  
 78 from OA support would harm the scientific community without any benefit for the quality of  
 79 publishing. Such a policy would simply distract from where the focus should be: quality of peer  
 80 review.

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### 83 4. Special issues promote participatory approaches and early career editors

84 SIs (or “special calls”) have a long tradition in scientific publishing. For editorial boards  
 85 undertaking scientific leadership, the SI is a formidable tool to foster debates about challenges,  
 86 scientific innovations, neglected topics or strategic reasoning (e.g. an SI relating to a future  
 87 conference). Why would SNSF treat such “orchestrated collections” of peer-reviewed articles  
 88 differently from “individual” publications?

89 By discrediting SI, the proposed SNSF SI regulation would affect editorial freedom and strategic  
 90 agenda-setting of respected scientists serving on Editorial Boards. For the fully independent  
 91 SSPH+ journals, it would be the first time in our long history that an external constituency has  
 92 threatened the academic and editorial freedom of our respected scientists.

93 Many independent and highly regarded scientist have proposed, led, supported and contributed  
 94 as editors, guest editors, reviewers and authors to SIs. This applies to the SSPH+ journals, to  
 95 many other “society journals”, and to other respected for-profit journals. In light of the absence  
 96 of evidence for a meaningful correlation between quality and RI versus SI status, SNSF should  
 97 abstain from “blanket condemnations” of independent scientists playing a role in SIs.

98 SIs, if initiated and run by independent scientists (the default in our journals and many others)  
 99 are an excellent tool to empower the research community, to launch debates, and to foster  
 100 contributions in fields of societal relevance. In line with Open Science visions, SIs foster a more  
 101 participatory approach to the promotion of science. In fact, our editorial boards use SIs also as a  
 102 tool to encourage both leading and junior scientists to co-lead calls for SIs to promote, in an  
 103 orchestrated manner, their prime fields of interest. For example;

- 104 ○ IJPH editors recently agreed to launch a call on [“Medical Aid in Dying”](#), led by Swiss  
 105 scientists who proposed the work in this highly controversial but neglected field. On what  
 106 basis can SNSF disqualify the decision of the editorial board to run this SI? The call has  
 107 been proudly launched by IJPH, is led by a team of guest editors, including one Editor-in-  
 108 Chief of IJPH, and has the full support of the independent Editorial Office at Swiss TPH.
- 109 ○ In October 2023, the two Editorial Boards of the SSPH+ journals decided at their first joint  
 110 Editorial Board Meeting to launch a joint call on [“Mitigating and Adapting to Climate Change  
 111 – Public Health Evidence”](#).

112 The publisher is not involved in any related discussions and decisions, since IJPH and PHR are  
 113 fully independent society journals.

114 We hope you understand that we object to the SNSF plans to ban Swiss-based first authors of  
 115 publications accepted in these (or any other) SIs from APC OA support. In such a case, we  
 116 would need to find strategies to protect the qualifying authors’ access to APC support (see 12).  
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## 119 5. [Country of origin is a major \(ignored\) driver of strains](#)

120 The country of origin of manuscripts is a further important distinction that is ignored by the  
 121 proposal to stop funding SI. A major argument made by Hansen et al is that the strain in  
 122 publishing is due to an increase in “low quality” publications. To support this notion, Hansen et  
 123 al present data to show that the number of PhDs awarded has not increased at the same rate  
 124 as the number of published articles. Rather surprisingly, however, Hansen et al. present OCED  
 125 data on completed PhDs in 2016-2022. Whilst they present a supplementary graph that  
 126 includes data from China, this does not tell the whole story. With its fast growing global share –  
 127 now approximately 20% - it would be more insightful to focus on and discuss the issue of China  
 128 alone.

129 Indeed, there are formidable challenges and strains that we (and many editors) see, at least in  
 130 public health sciences. As well as financial incentives for authors, other policies reportedly exist  
 131 in China that are ignored by Hansen et al. as they do not target PhD students. For example,  
 132 leading universities require graduates at Master’s level to have at least one publication, and  
 133 there is even large pressure at Bachelor’s level. The current challenges of a large increase in  
 134 submissions from China call for a careful assessment of national indicators for both SI and RI,  
 135 rather than a basic analysis using indicators that assume a simple correlation between quality  
 136 and quantity.  
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## 139 6. [The Publisher is not the line of demarcation to judge journals and SIs \(or RIs\)](#)

140 A central feature of both Hansen et al. and Matthias Egger’s lecture is that certain publishers  
 141 are driving down quality via an over-reliance on SI publications. However, we argue that rather  
 142 than using the publisher alone to determine the “good” and the “ugly”, it is essential to make  
 143 judgements at the journal level and to understand who the owner of a journal is. It is important  
 144 to note here that newer Gold OA publishers also provide publishing services to traditional  
 145 society owned journals. When assessing SI, it is crucial to know who the initiators, editors and  
 146 guest editors of the SI are, and whether (and how) SI procedures may or may not differ from  
 147 those used with RIs. Otherwise, one will not be able to identify potential conflicts of interest or



148 other risks to quality. Let us provide a few details about the subtleties inherent in making  
149 judgements of this type:

- 150 ○ Many traditional and newer publishers (including Frontiers, for example) publish both their  
151 own journals and journals owned by independent societies. Society Journals usually have  
152 their own editorial office that is entirely separate and independent from the publisher. The  
153 SSPH+ journals are an example where the publisher provides a well- defined technical  
154 service. Although the category of Society Journals cannot provide guarantee for quality *per*  
155 *se*, one cannot evaluate quality, integrity and possible conflicts without taking ownership and  
156 the business model of a journal into account. A range of critical issues are determined by  
157 the owner, not the publisher (for more details, see point 5).
- 158 ○ An assessment of the financial flows and profits of a journal are also relevant. Typically,  
159 profits of publisher-owned journals go to private owners or anonymous shareholders,  
160 whereas revenues of “society journals” will most likely support science-oriented activities of  
161 a not-for-profit society. Unfortunately, “society journals” can remain deprived from revenues  
162 if scientists and societies do not object to the non-transparent contracts of publishers who  
163 are unwilling to share revenues with the owner/society. Related gray zones must be  
164 understood to identify possible conflicts, in both RIs and SIs.
- 165 ○ The recognition (both financial and non-financial) of the contribution of scientists as editors-  
166 in-chief, handling editors and/or reviewers in the publishing business has become the  
167 subject of discussions and innovations. The ongoing peer-review crisis (see our [editorial](#))  
168 requires action. For example, Swiss Medical Weekly pays reviewers and editors an  
169 honorarium. In 2023, the not-for-profit SSPH+ shared revenues with 2021/2022 editors in  
170 recognition of their extra efforts during the transition to OA and the pandemic. Whether such  
171 models creates conflicting incentives (e.g. for editors or guest-editors of SIs and of RIs)  
172 needs to be monitored.

173 In sum, various factors affect quality or potential conflicts of interest in publishing, and it is not  
174 possible to assess these via the simple issue of who provides publishing services for the  
175 journal. Any focus on publishers or on SIs alone is destined to fail.

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## 178 7. Independence of editors and editorial offices matter

179 A further potential modifier of quality, integrity and scientific independence and a source of  
180 related conflicts relates to the experience, authority, standing and status of the Editors-in-Chief  
181 and Handling Editors. They are the key figures in deciding what to promote, the handling of the  
182 peer review, and the final decisions in this process. Ideally, this process should be based solely  
183 on scientific content and quality, and should be independent from the publisher’s business  
184 model, both in SI and RI publication. These dependences do not follow black-and-white lines,  
185 but to risks distributed along a complex continuum, not captured by simply distinguishing SI  
186 from RI. They are also not addressed in Hansen et al. We therefore elaborate on them here.  
187 There are several basic models in use:

- 188 a) Many (but not all) “society journals” guarantee that journal editorial offices, editorial boards,  
189 and handling associate editors have full independence from the owner and the publisher.  
190 The SSPH+ journals have pursued this model for decades. Neither Springer (until 2020) nor  
191 Frontiers (since 2021) have any insight, say or influence with respect to editorial strategies  
192 or peer review decisions whatsoever – both in SIs and RIs.
- 193 b) Some other society journals have given up independent Editorial Offices but retained  
194 independence of all editorial appointments, rules and peer review decisions. Staff of the  
195 publisher might take up roles in the Editorial Office.
- 196 c) Many publisher-owned journals (e.g. many Frontiers-owned journals) are led by a scientist  
197 (asked to serve as Editor in Chief) and editorial boards that are supposed to be in full control  
198 of the peer review decisions. Conflicts in this model may occur e.g. a leading scientist

199 recently stepped down as EiC of two Elsevier hybrid journals because the publisher did not  
200 respect editorial independence but instead intervened in editorial decisions.

201 d) In the last model, there is no longer any independence between the decision-making  
202 editors, the owner of the journal and the publisher. Publishers such as SpringerNature  
203 (including BMC) and Elsevier create an ever-increasing number of such journals e.g. the  
204 growing family of journals branded as “Lancet” run under this model, and neither Editors-in-  
205 Chief nor Handling Editors who manage the peer review process are leading scientist in the  
206 field. They are instead administrative staff, hired by the publisher of the journals. In this  
207 model, editorial procedures are aligned with the publisher’s business model. The model  
208 ends the traditional era that has prevailed for centuries, within which peer review decision  
209 making is separate from the publishers’ business.

210  
211 As an example of the quality threats of this model, we refer to the recent “Lancet in  
212 Planetary Health” publication that triggered our [editorial in IJPH](#). This piece would never  
213 pass a review process steered by experts. Instead, the Elsevier staff (Editor-in-Chief and  
214 Handling Editor) lack the experience and scientific background to realize that the “findings”  
215 were abstruse. Given the branding (Lancet), the media jumped on the claim that one third of  
216 all deaths due to microbial resistance are due to ambient air pollution and thus prevented  
217 via clean air policies. Such papers fulfill the likely prime purpose of Lancet brands – namely  
218 to get maximal citations to booster the Impact Factor and shareholder profits, given the  
219 excessive APC fee for 5,780 USD (which is 4-5 times the APC MDPI self-declares as being  
220 the average paid across all its publications).

221 Clearly, the above “continuum” does not provide a black-and-white indicator to distinguish the  
222 good from the ugly. However, it raises the question of why SNSF (and Swiss universities /  
223 libraries) continue to cover excessive APC fees of for-profit brands where editorial decisions are  
224 under the control of a shareholder-driven business model.

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## 227 8. Duration of peer review lacks specificity for any decision

228 Hansen et al. provide data purported to show that decreasing article turnaround times have  
229 been observed for some publishers, leading to strain and decreased quality. We certainly agree  
230 that good quality peer review takes time. To use the duration of the peer review as an indicator  
231 for quality, however, will fail on various grounds. Unfortunately, these grounds were  
232 inadequately described in both Hansen et al. and the president’s lecture. Any analysis of peer  
233 review duration and its inadequacy for use as a quality indicator must consider various issues:

- 234 ○ As emphasized in our [editorial](#), public health sciences (amongst other disciplines) face a  
235 formidable review crisis. Thus, many journals search for strategies to *reduce* the lengthy  
236 procedures (also see 6). An effective strategy to reduce the distribution of the time needed  
237 for peer review would be welcomed by many editors, authors and publishers.
- 238 ○ Hansen et al.’s description of a shifting of the average review cycle to the left is inadequate,  
239 as it must be noted that this shift may not necessarily be “suspicious”. Exchange with  
240 editorial experts at the front of publishing would reveal a very high interest “behind the  
241 scenes” in finding solutions that result in a shift to shorter high-quality peer review. Yes,  
242 MDPI narrowed this distribution drastically and the shift to an average of 37 days is  
243 impressive. But why do Hansen et al. play down the fact that Hindawi shows a similarly  
244 successful shift, achieving an almost indistinguishable average of approximately 40 days?  
245 What about the fact (shown in Figure 3 of Hansen et al.) that all publishers have a relevant  
246 fraction of papers published within 30-40 days, although less frequently or less consistently  
247 - is this tail of the distribution always suspicious, or only in case of SI publications? On the  
248 other side, what about SI peer reviews with far longer peer review turnaround times? Is this  
249 a guarantee of quality?

- 250 ○ Figure3supp2 in Hansen et al. is supposed to tell the story that SI have shorter peer review  
 251 turn-around times than RI, which appears to have been used as the basis for the proposed  
 252 SI-based SNSF policy. Please note:
- 253 a) These differences are very small in the vast majority of publishers i.e. in the range of  
 254 some 5-10 days.
- 255 b) Even in case of BMC, Springer and Wiley, where differences between SI and RI  
 256 turnaround time would occasionally reach 20-40 days, the average time is at a very  
 257 high level e.g. 120 versus 160 days – a difference that is easily explained (see  
 258 below).
- 259 c) Among the four publishers with a clear trend toward shorter review cycles (Frontiers,  
 260 Hindawi, MDPI, and PLOS), SI and RI show a distinct trend only for Hindawi and  
 261 PLOS, whereas the trend patterns in Frontiers and MDPI are not much different  
 262 across SIs and RIs.
- 263 d) Governance modalities of publishers and editorial boards influence the efficiency of  
 264 the peer review process. A simple focus on peer review getting faster is a rather  
 265 inadequate attempt to distinguish the “ugly” (faster review average) from the “good”  
 266 (slower average), since the latter is uncorrelated with scientific quality and rigor (in  
 267 journals with peer review). Moreover, and as long as the duration remains within a  
 268 reasonable range, the shift and narrowing of this distribution could be lauded as a  
 269 sign of efficiency, highly welcomed by scientists.
- 270 e) The use of turnaround time as an indicator ignores the fact that many journals – both  
 271 society journals and publisher-owned journals – adopt “express review” strategies to  
 272 come to faster decisions with highly relevant or novel publications.
- 273 ○ The discussion around different lengths of peer review in SI versus RI in Hansen et al. lacks  
 274 insights into editorial practices and realities. It is fully in line with our long-standing  
 275 experience as editors, reviewers and authors that editors (and guest editors), reviewers and  
 276 authors tend to be specifically committed when they agree to launch a SI. Though we  
 277 cannot provide the data, it is our long-standing if anecdotal evidence that SIs tend to have  
 278 more efficient peer-review performance. This is due to various factors such as editors’  
 279 specialist interest in the subject and desire to see the SI come to fruition, and authors’  
 280 desire not to miss the deadlines for revisions that SIs may have set.
- 281 ○ Hansen et al. have not assessed quality. Thus, in the absence of evidence of a link between  
 282 quality and duration of review, this indicator is useless. As shown in Hansen et al., the vast  
 283 majority of publications, both SI and RI, have somewhat adequate if not long peer review  
 284 cycles, and all publishers, SI, and RI, have a fraction of publications with “surprisingly short”  
 285 cycles.

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287 In sum, If SNSF is interested in using duration of peer review as a basis of APC support  
 288 decisions, it would need to rely on the specific turnaround time of the publication in question  
 289 rather than some aggregate per-journal, per-publisher or SI average. The administrative burden  
 290 necessary to (fairly) assess the peer review duration of each article will ultimately be impossible  
 291 to meet, for several reasons. The definition of the turnaround time varies across journals, the  
 292 “fast-track peer review” models adopted by many respected journals would need to be  
 293 considered, and any chosen cut-off would simply invite publishers/editors/authors to prevent  
 294 cycles that are “too fast” (e.g. by postponing submission of the final revision, thus not risking  
 295 exclusion from OA support).

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## 299 9. Arbitrary criticism or endorsement of specific publishers

300 The following sentence of the PB News 52 calls for attention: “Due to questionable quality  
301 assurance practices around exponentially rising numbers of special issues put out by two OA  
302 publishers (*MDPI* and *Frontiers*),...”. It is disappointing to see SNSF take a black-and-white  
303 approach against these two Swiss-based OA publishing companies. The indicators chosen by  
304 Hansen et al. do not provide any evidence as to why these two should be in a separate  
305 category to the rest.

306 It was rather surprising to see Matthias using a limited set of (not well-correlated) indicators  
307 provided by Hansen et al. to laud BMC as a publisher. This promotion of a for-profit publisher  
308 hinges solely on the observation of Hansen et al. that BMC does not have a clear upward trend  
309 in running SI. As we have discussed, it does not make sense to pick this single indicator to  
310 applaud SpringerNature’s OA publisher BMC, with its mixed bag of publisher-owned and society  
311 journals. Springer was our publisher for many years, and we would be very happy to participate  
312 in a discussion regarding our related experiences.

313 We would urge SNSF to distance themselves from such “white listing”. If this is Matthias’  
314 personal opinion about BMC, it should be disclosed as such, but not featured with the voice of  
315 SNSF.

316 While not defending or accusing any specific publisher, the black-and-white narratives of SNSF  
317 raise many questions. The impact of this approach is inherently coupled with an implicit and  
318 unhelpful “white washing” of all the other journals and publishers.

319 We consider it inadequate for a Swiss national authority to spread unfounded negative  
320 information about a few publishers, instead of focusing on the promotion and support of quality  
321 assurance in scientific publishing.  
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## 324 10. Exclusion regulations trigger circumventions

325 Regulations such as the disqualification of SNSF grantees from APC funding of articles  
326 published in SIs will foster circumventions to protect the strategic editorial and strategic power  
327 of SI, the authority of respected scientists leading SI, and the rights of SI authors to access OA  
328 APC support. Indeed both, honest and independent editorial boards of journals in Switzerland  
329 and abroad, and business-driven staff hired by profit-oriented publishers will find ways to  
330 circumvent policies that disqualify articles published in SI instead of RI. We already exchanged  
331 related ideas we could discuss.

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## 333 11. Summary and Conclusion

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335 The SNSF plan appears to follow the assumption of Hansen et al that the strain in scientific  
336 publishing is caused by the high number of SI’s at certain Gold OA publishers like MDPI and  
337 Frontiers. However, there is no evidence that this is true. “Between 2014 and 2018, the  
338 researcher pool grew three times faster (13.7%) than the global population (4.6%)”and “low-  
339 income economies have witnessed the fastest growth (+36%) in researcher density since 2014”  
340 (citation from the [UNESCO Science Report 2021](#)). Moreover, Hansen et al provide no criteria to  
341 address quality. Though we neither have a recipe to distinguish the good from the ugly, it is very  
342 clear to us that the distinction of SIs versus RIs now considered by SNSF lacks scientific  
343 reasoning, and will entirely fail to address any of the threats, strains and challenges faced in the  
344 ever-changing for-profit publishing business. Instead, it would:  
345

- 346 • create administrative strains for SNSF and (mostly Swiss) scientists, while facing very
- 347 complex assessments and discussions for each and every article requesting APC support;
- 348 • force SNSF to defend the choice of a single indicator against the strong evidence for a gray
- 349 continuum of poorly correlated quantitative and qualitative publishing indicators;

- 350 • amplify the peer review crisis, since scientists will shy away from reviewing for submissions  
 351 made to SIs given the collective reputational damage.  
 352 • use SNSF resources to find quality-based rules for support – an undertaking that will  
 353 inevitably reveal that distinguishing “good quality” SI articles from “questionable quality” SI  
 354 articles would be as difficult as categorizing the quality of RI articles.  
 355 • use further SNSF resources to deal with the protest of Swiss scientists in defense of their  
 356 reputation as respected Editors or Guest Editors, authors, and reviewers of RI and SI.  
 357 • As mentioned, it frontally contradict four of the six objectives drafted by the swissuniversities  
 358 Open Access Strategy in its current draft version (30.10.2023),

359  
 360

361 We expect SNSF to focus instead on contributing solutions that promote and support quality,  
 362 integrity, transparency and the independence of the science community in the publishing  
 363 business. The publishers are not the line of demarcation to pursue these objectives. As  
 364 discussed above, those lines are far more subtle and complex and call for assessing:  
 365

- 366 a) Single journals (if not articles),  
 367 b) Ownership of journals,  
 368 c) Independence of editorial decision processes,  
 369 d) The level of APC fees and the prevention of “double dipping”,  
 370 e) The distribution and use of for-profit and not-for-profit revenues as possible indicator for  
 371 conflicts of interest  
 372 f) Transparency

373  
 374 Policies that target “publishers” of peer-reviewed journals or “SI versus RI” will neither enhance  
 375 quality nor provide added value to scientists or SNSF.  
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380 NK/CW/AB 15.11.2023  
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