Thank you for reaching out regarding the Finnish Publication Forum's (JUFO) recent reclassification of journals to Level 0. At MDPI, we uphold transparency and integrity in scholarly publishing and welcome discussions about Open Science practices.

We would like to share our perspective on this decision:

1. Concerns about criteria objectivity

We are deeply concerned by JUFO's recent decision and find it challenging to understand the objectivity of the applied criteria. The simultaneous downgrade of 271 journals suggests a generalized evaluation process rather than a fair assessment of each journal's merit.

2. Grey Area journals and APC publishing model

JUFO's reference to "grey area" journals utilizing the Article Processing Charge (APC) model implies a focus on publication volume over quality. It is worth noting that APCs are common across Gold and Hybrid OA journals, including those by traditional publishers. While JUFO emphasizes that individual journals are evaluated independently based on the level category criteria, the broad reclassification of journals from MDPI and Frontiers appears to generalize aspects of our operating model rather than assessing each journal on its own merit. Singling out fully OA publishers appears inconsistent and risks undermining global OA initiatives.

Moreover, with OA steadily gaining preference globally, this decision has significant implications for the publishing industry as a whole.

3. Misalignment with Finland's Open Access mandates

JUFO's decision conflicts with Finland's national OA policies, which emphasize immediate access to publicly funded research:

- The "Policy for Open Access to Scholarly Publications" outlines Finland's commitment to ensuring immediate OA for all scholarly outputs.
- The "Research Council of Finland" mandates immediate OA publication in line with Plan S principles.

Notably, Plan S supports open-access publishing by advocating for fair and transparent funding mechanisms, ensuring researchers can publish their work openly while promoting equity and sustainability in scholarly communication.

The reclassification will hinder Finnish researchers from publishing in OA journals indexed by leading global databases, potentially affecting their career progression.

4. Commitment to Quality

As at 18 December, MDPI publishes a total of 455 journals, including 446 peer-reviewed journals and 9 conference journals. Many of these are indexed in prestigious databases including 298 journals in the Web of Science, 303 journals in Scopus, 90 journals in PMC/PubMed, and 17 journals in MEDLINE. This growing recognition highlights MDPI's commitment to high publishing standards.

MDPI also collaborates with 323 Finnish Editorial Board Members (EBMs) across 151 journals, who play key roles in maintaining the scientific credibility of MDPI journals, including positions as Editors-in-Chief (EiC).

5. Growth of Open Access

The growth of OA reflects a global shift driven by mandates, increased visibility and citations. According to <u>Dimensions</u> data (2023), 56% of research outputs were published in OA journals, while only 35% of papers appeared in closed-access journals. MDPI facilitates this transition, adhering to rigorous peer-review processes and maintaining research integrity through partnerships with organizations like <u>COPE</u>, <u>STM</u> (including our participation in the <u>STM Integrity Hub</u>), <u>ALPSP</u>, and <u>OASPA</u>.

6. Open Questions for the Research Community

JUFO's decision raises important questions for the broader research community:

- While its classification criteria indicates that 'Open access journals are evaluated using the same criteria applicable to other publication series', why aren't publishers with mixed publication models evaluated equally, despite also using APCs?
- Is the reclassification disproportionately targeting fully OA publishers?
- How does this align with Finland's national commitments to advance OA and Open Science?

We urge ranking systems like JUFO to adopt consistent, transparent, and industry-wide evaluation criteria that account for the evolving diversity of modern academic publishing.

Thank you for the opportunity to comment on this issue. We remain committed to advancing Open Science and supporting the academic community worldwide. Should you have further questions or require additional information, please do not hesitate to reach out.

Kind regards,

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