

This response is on behalf of the not-for-profit publisher The Company of Biologists, which publishes five journals in the biology/biomedical field. All our journals receive content from NIH-funded authors (ranging between 8% and 37% of our published output).

The Company of Biologists is part of the Society Publishers Coalition (SocPC) and we have contributed to their joint response to the NIH request for information. In this separate response, we provide specific feedback on option 3 detailed in the proposal - allowing a higher APC to be paid where peer reviewers are financially compensated.

One of The Company of Biologists' journals, Biology Open (BiO), has recently been conducting a trial to assess the feasibility, scalability and financial sustainability of paying peer reviewers to accelerate the process of peer review while ensuring its quality. Full details of phase 1 of this 'Fast and Fair' trial can be found in [Gorelick and Clark 2024](#) (bioRxiv preprint), and updated statistics on the journal website: <https://journals.biologists.com/bio/pages/fast-fair>.

Briefly, the trial demonstrates that, by pre-recruiting potential peer reviewers and paying them only when a) they return their report within the specified time-frame (in this case 4 days) and b) when the handling editor assesses the quality of the peer review as helpful, it is possible to significantly reduce the time taken to take a manuscript through peer review - from 35 to 7 working days - without compromising quality.

Peer reviewers are paid £220 (~\$300) per manuscript they review. With an average of two reviewers, the direct cost per reviewed manuscript is \$600. However, a significant proportion (in our case, around 40%) of reviewed papers are rejected after peer review, meaning that the direct cost of paying peer reviewers is around \$1000 per accepted paper (see Figure 1 for how this scales with acceptance rate). However, we have also incurred significant costs in setting up and administering this process - particularly in terms of additional staffing required. In 2024, total cost per manuscript associated with the 'Fast and Fair' process equated to over \$3000; note that this cost does not include any of the 'normal' costs associated with assessing and publishing a manuscript. While we expect this cost to decrease significantly as the process is rolled out to all papers and efficiency improves, we still estimate the ongoing additional costs associated with paying peer reviewers under this model to be over \$1500. We also note that many journals require three peer reviews as standard for manuscript assessment, which would further increase the costs by \$400-500 per accepted paper. At present, with the APC for BiO set at \$2500 for 2026, the majority of these additional costs are being absorbed by the Company, but this is only possible in the short term and we are therefore working on a more financially sustainable model that is likely to involve an increase in our APC.

Given the above information, **we therefore propose that any cap on APCs should be, as a minimum, \$1500 higher for journals that pay peer reviewers.** We also argue for a tiered system according to journal acceptance rate to allow journals to recoup the additional costs associated with paying reviewers for rejected papers. There should also be a provision to increase this number annually to account for inflation.

We note that paying peer reviewers comes with risks to the integrity of the scientific record:

- Low-quality peer review - whereby reviewers may accept invitations to review papers they are poorly qualified to assess or with which they have a conflict of interest to gain financial recompense.
- Incentives for journals to relax acceptance criteria, increase the percent of manuscripts that are accepted following peer review, and thus increase revenue from APCs (minimizing payments to reviewers of rejected manuscripts, which do not result in an APC).

To mitigate these concerns, we argue that - to qualify for a potential higher cap - journals must demonstrate they have taken appropriate steps to ensure the quality and rigour of their process is not compromised by paying peer reviewers. These could include:

- Transparency in decision criteria and peer review rubric.
- Reviews and editorial comments made public for all accepted manuscripts.
- Feedback process from journal editors to reviewers not meeting quality requirements to improve future peer review activity.
- Annual reporting of detailed peer review statistics (speed of each stage of the process, acceptance/rejection rates at each stage of the process, number of reviewers used etc) - showing not just the average but also the spread of data.
- Submission open to all without restriction to members or affiliates.
- Payment in cash rather than for in-kind benefits (to ensure all reviewers are appropriately compensated).

The motivation of the BiO 'Fast and Fair' trial is to accelerate the process of peer review - supporting authors to publish their work more quickly, while maintaining high levels of rigor and integrity in the review process. However, we also argue that there is a broader case to be made for recognising the work done by peer reviewers - either financially or through other routes. Where journals choose to compensate reviewers financially, there are significant costs involved that cannot easily be absorbed by current financial models. While we have broader concerns about the implementation of a cap, we do support a model whereby a higher APC could be charged by journals paying peer reviewers.

Figure 1. Graph showing how the additional cost of paying peer review scales with acceptance rate. For a journal that accepts 30% of peer reviewed papers, the additional cost per accepted manuscript in direct reviewer payments is \$2000, assuming 2 reviewers per manuscript being paid \$300 per manuscript. On the other hand, if 100% of reviewed manuscripts are accepted, the additional cost is \$600. Note that if the acceptance rate of reviewed manuscripts stays constant, then the additional APC does not change, regardless of the total number of manuscripts sent for peer review (i.e. there are no efficiencies of scale).

