



# OpenAIRE's response on the Implementation Guidelines of Plan S

February 8, 2019

OpenAIRE reiterates [its support](#) for the goals and principles of Plan S. The OpenAIRE consortium received the Guidance on the implementation of the Plan S with great interest and appreciates this call for public feedback.

As a European infrastructure that supports a more equitable open science landscape, OpenAIRE considers this an important step towards an open and transparent environment for research, where all kinds of research outputs can be openly accessed, linked, enriched, archived and mined. This is fully in line with its mission to support the implementation of open access across European member states.

While it is expected that this initiative will accelerate the transition to Open Access, we believe that Plan-S works to **support and complement** existing efforts in publishing business models while also working to push forward alternative vehicles for scholarly communication. The latter will ensure that we harness the opportunities arising from the digital revolution rather than simply reinforcing an almost obsolete publishing model.

In particular, OpenAIRE welcomes the following aspects:

- the recommendation that repositories should be **OpenAIRE compliant**;
- the recognition of **different routes** for Plan S compliance, namely the deposit of scholarly articles in Open Access repositories;
- the demand for **transparency on costs** and fees in order to support journal and platform compliance;
- the intention of cOAlition S to jointly **support mechanisms** for establishing Open Access journals, platforms, and infrastructures, promoting a landscape of diverse publishing models;
- the definition of requirements for **individual publications** and for journals, platforms, repositories and transformative agreements in the section 'Technical Guidance and Requirements', initiating a good direction for the future.

## Overall feedback

After careful consultation, we strongly advise that the Technical Guidance can and should be revised along the following four lines:

**1. Transition Period for Repository Systems Compliance:** A well-functioning infrastructure comprised of open access repositories, platforms and journals, according to widely accepted open standards, is crucial. However, because the vast majority of repositories do not support some of the current technological requirements outlined in Plan S, we suggest that an incremental approach is applied to compliance. This would include a transition period with clear timelines and objectives, similar to the approach taken with transformative agreements. In addition, Plan S should clearly distinguish mandatory requirements from additional recommended requirements (see detailed section below). **OpenAIRE, together with COAR, is willing to cooperate with cOAlitionS to fine**

tune the requirements to allow the international network of repositories to support Plan S, become next generation repositories, ensuring that all open access platforms and journals develop into powerful open dissemination platforms.

**2. Enabling text and data mining (TDM):** In principle the technical guidelines indicate that Plan S is compliant with TDM and appears an ambitious initiative certainly in the right direction, precisely because TDM covers a quite wide spectrum of potential uses. However, its loose language invites multiple incompatible licences to be used, something which in the long run does not help TDM. **However, more precise wording for the legal part might have contributed to an even stronger statement.** OpenAIRE addresses most of these issues in its guides on how to licence your work and your repositories for open science ([Making your Repository Open](#), [Toolkit for Researchers: Legal Issues](#)).

**3. A transparent monitoring procedure:** The Plan S guidance indicates that cOAlitionS members will monitor costs and uptake, however, it is not evident on how the data needed to carry this out will be collected. It is also not evident how the monitoring will be effective across different funders' systems. We therefore propose to include monitoring aspects from the design phase of PlanS which include the following:

- **Costs:** Publishers employing APCs are responsible for providing data for APCs via an automated feed to **OpenAPC** {doi, APC cost, funder id} or to any other designated platform, an effective and simple reporting mechanism as proven by the [OpenAIRE FP7 OA pilot](#). An alternative method worth exploiting is to report costs (for both APC and non-APC venues) in the metadata of the publication.
- **Compliance:** Put compliance measures in place for identifying practices and behaviours, from both authors, institutions and publishers. These should include the depositing of publications in OA repos, use of identifiers, rights and licenses, linked data, and in general how to make publications FAIR.
- **Usage:** Publishers, publishing platforms and repositories must collect and expose usage metrics/statistics in a homogeneous and consistent way following emerging standards (COUNTER, OpenAIRE Guidelines for Usage Statistics/IRUS UK) towards an open Metrics infrastructure as proposed by the [EC HLEG Next Generation Metrics report](#).

**4. Underpinning a move towards a full OA landscape:** While Plan S states that “*The guidance is directed at cOAlition S members and the wider international research community*”, most of the compliance issues target third parties, with small or vague commitment from funders on how to support this. More specifically:

- **The support for alternative publishing is absent**, and we strongly recommend to put forward a funding scheme to support alternative publishing models.
- **The support to DORA must be accompanied by concrete implementation actions** and change research assessment and evaluation as this relates to proposal/funding assessment.

# Detailed feedback

We consider that the Technical Guidance can and should be improved in accordance with the following points:

## Re: 3. Publication Costs

*Where article processing charges (APCs) apply, cOAlition S will contribute to establishing a fair and reasonable APC level, including equitable waiver policies, that reflects the costs involved in the quality assurance, editing, and publishing process and how that adds value to the publication. To help inform the potential standardisation of fees and/or APC caps, cOAlition S will commission an independent study on Open Access publication costs and fees (including APCs).*

- Fair and reasonable are somewhat vague terms and they may differ from country to country, or in different domains. We suggest that cOAlition S members start by placing similar caps across funders following the example of the [OpenAIRE FP7 OA post-grant pilot](#), and consider this as the **total** publication cost, including hidden costs in publishers invoices.
- Furthermore, we welcome and support the commission of the independent study, but for it to be effective we stress the importance of placing good monitoring mechanisms from an early stage. OpenAIRE is willing to engage in a working group focusing on costs.

## Re: 4. Supporting Quality Open Access Journals and Platforms

*cOAlition S explicitly acknowledges the importance of a diversity of models and non-APC based outlets*

- We expect that cOAlition S members **invest equally in non-APC and different/alternative publishing models** in order for them to meet technical requirements compliance, realizing that these non-APC based outlets may need more time for a transition to full compliance.
- We also encourage that cOAlition S members and the community work more closely with scholarly societies, and collaborate towards a community based open access ecosystem and a fair "publication processing charge".

## Re: 8. Licensing and Rights

*cOAlition S generally recommends using Creative Commons licenses (CC) for all scholarly publications. For scholarly articles, cOAlition S requires the use of the Creative Commons Attribution (CC BY) 4.0 license. In addition, cOAlition S will accept the use of the CC BY-SA 4.0 license, and publishing in the public domain (CC0), in line with the cOAlition S aim of maximum re-use of the research funded...*

Plan S correctly identifies the relevant Open Access Declarations and accordingly clearly states that limitations such as "non commercial" are not compliant with Open Access. This is particularly important as national TDM exceptions in the EU are limited to non commercial uses and researchers often use the non commercial clause of Creative Commons licences. This is important for proper TDM. However, we propose less ambiguity in the following:

- Plan S becomes less clear when it "requires" open licences (but without defining them) and only "recommends" Creative Commons Licences. Whereas the spirit of PlanS seems to unquestionably point in the direction that Open Licences are those compliant with the Open

Access declaration, a clearer statement on this would be more effective (e.g. CC BY 4.0 or compatible licences).

- Also, regarding the Non Derivative clause, PlanS makes an important contribution clarifying that integrity is protected by the BY clause. However, it then states that the ND clause “should” not be necessary to protect integrity. Again, the use of specific wording (“should”) leaves some space for interpretation, which could have been avoided with less ambiguous statements.
- Finally, it is not clearly stated that the repository has to be licenced under a CC BY 4.0 as well, in addition to the articles or databases in the repository, a recommended area of [good-practice by OpenAIRE](#). TDM needs to be performed on single resources as well as on the collection of resources, and for copyright law purposes these may be two different works, each one requiring proper licensing.

### **Re: 9.1 Basic mandatory criteria for Plan S compliant Open Access journals and platforms**

*All scholarly content must be openly accessible (journal website or dedicated platform) and free to read and download immediately upon publication, without any kind of technical or other form of obstacles.*

We propose to change the above compliance criteria to include open APIs, with no technical barriers or constraints in order to enable machine readability and downloading for text and data mining.

### **9.2 Mandatory quality criteria for Plan S compliant journals, platforms, and other venues:**

*Transparent costing and pricing: information on the publishing costs and on any other factors impacting the publication fees (for example cross subsidising) must be openly available on the journal website/publishing platform. This must include details on direct costs, indirect costs and potential surplus.*

We strongly propose that as a compliance measure, publishers and proactively and periodically push APC and related information (e.g., funder identifier for cross funding) into community based initiatives, e.g., OpenAPC). Working with metadata initiatives (e.g., OpenAIRE, Metadata2020) publishers include and expose APC related information in the publication metadata.

*Linking to underlying data, code, and so on available in external repositories.*

As with repositories, publishers must follow community emerging standards as OpenAIRE and DataCite guidelines to expose underlying data and code links.

*High quality article level metadata – including cited references – in standard interoperable format, under a CC0 public domain dedication. Metadata must include complete and reliable information on funding provided by cOAlition S funders.*

As with all other metadata elements we propose to use the [OpenAIRE Guidelines](#) as the metadata schema to expose metadata (OpenAIRE Guidelines are currently used in many repository regional networks around the world).

*Machine readable information on the Open Access status and the license embedded in the article.*

Metadata must include web-identifiers for controlled vocabulary terms and concepts as proposed in e.g. NISO-ALI and COAR Vocabularies as supported in the OpenAIRE Guidelines.

### 9.3 Recommended additional criteria for journals and platforms:

*Support for PIDs for authors (such as ORCID), funders, funding programmes and grants, institutions, and so on.*

We propose that publishers use the OpenAIRE Guidelines (in accordance to DataCite Schema) so as to have a more uniform data space with repositories.

*Direct deposition of publications by the publisher into Plan S compliant author designated or centralised Open Access repositories.*

As many author-designated institutional repositories may not be technically ready to accept automated deposition from publishers, we propose to use [Zenodo](#) as one of the trusted, intermediary places for automatic ingestion (the *orphan* approach). The OpenAIRE OA Broker service can be subsequently used to distribute this content to repositories.

*Openly accessible data on citations according to the standards by the Initiative for Open Citations I4OC.*

We propose to make this **compliance measure mandatory**, as this is a key measure in introducing transparency on metrics, the core of a truly open and trusted scholarly communication system.

#### 10.2 Requirements for Plan S compliant Open Access repositories:

*Full text stored in XML in JATS standard (or equivalent)*

We propose to change this compliance measure to include an open standard, as the specific mention of JATS reflects only a current format and places a barrier on future, perhaps more innovative/efficient formats.

*Open API to allow others (including machines) to access the content*

This compliance criteria should be also true for publishers and publishing platforms.

*QA process to integrate full text with core abstract and indexing services (for example PubMed)*

This compliance criteria assumes that key indexing services have open and standard APIs across them, and that the metadata they offer meets the full compliance criteria. OpenAIRE already works towards achieving this with our OA Broker service and the application of the OpenAIRE Guidelines.

## About OpenAIRE

As a major open access infrastructure, addressing both social and technical aspects, OpenAIRE represents a key range of stakeholders across Europe, notably research performing organizations, working to make this a reality. OpenAIRE, a critical pillar of EOSC, has established structures to help efficiently bridging 'the last mile' between infrastructural services and researchers on-site, by leveraging its unique network of **34 National Open Access Desks** who help to steward research from the heart of where science is created, in the institutions, through to its further visibility and global exposure in research networks.

[www.openaire.eu](http://www.openaire.eu)