



open access in the european research
area through scholarly communication

OPERAS Declaration on the Plan S Implementation Guidance



8 February 2019

OPERAS Website: <http://operas-eu.org>

DOI: [10.5281/zenodo.2559268](https://doi.org/10.5281/zenodo.2559268)

Contact: pierre.mounier@openedition.org and suzanne.dumouchel@huma-num.fr

OPERAS – open access in the european research area through scholarly communication is the European research infrastructure dedicated to open scholarly communication, particularly in the Social Sciences and Humanities. OPERAS’ main goal is to coordinate and pool university-led scholarly communication activities in view of enabling Open Science as the standard practice. With currently 38 partners, OPERAS strives to create a more efficient, fair, inclusive and sustainable scholarly communication ecosystem for European researchers.

The OPERAS Declaration on the Plan S Implementation Guidance is the result of an open consultation within the OPERAS Consortium. It has been approved by the OPERAS Core Group. The OPERAS Coordinators wish to thank Paola Galimberti, Aysa Ekanger, Delfim Leão, Maciej Maryl, Aleš Pogačnik, Matevž Rudolf, Jadranka Stojanovski, and Sofie Wennström for their outstanding contributions to this text.

PREAMBLE

On 27 November 2018, cOAlition S has published a guidance document on the implementation of Plan S and has called for feedback from the community on the different topics addressed.

OPERAS (open access in the european research area through scholarly communication), the European research infrastructure dedicated to open scholarly communication in the Social Sciences and Humanities, is pleased to provide its recommendations to cOAlition S. The OPERAS Consortium gathers 38 members from 15 countries, forming a community of publishers, research organizations, libraries, service providers, and infrastructures fully committed to the development of Open Access in the Social Sciences and Humanities.

The OPERAS Consortium welcomes the Plan S initiative of “making full and immediate Open Access a reality,” which aligns with its own goal. Yet, the solution to how this goal can be reached globally must take into consideration not only the differences between disciplines, but also between countries, languages, and academic communities, especially regarding their communication practices. The OPERAS members are particularly aware that there is not a single path to Open Access. Regarding Open Access policies, bibliodiversity should be adopted as a prime principle, as proposed by the [Jussieu Call for Open science and bibliodiversity](#).

The following remarks of the OPERAS Consortium result from the Jussieu principles and the will to positively contribute to the implementation of Plan S.

“MAKE FULL AND IMMEDIATE OPEN ACCESS TO RESEARCH PUBLICATIONS A REALITY.” ALSO FOR BOOKS!

We understand that cOAlition S has set a tight schedule for the implementation of its plan for journals and has decided to postpone the implementation for other types of publications, such as academic books. As the OPERAS Consortium gathers a number of university presses, scholarly-led publishers, platforms, and infrastructures already practicing Open Access book publications, we encourage cOAlition S to start working without delay on setting up an implementation plan for books as well and in partnership with DOAB (Directory of Open Access Books). OPERAS would be happy to contribute to such a plan with the coordination with other relevant stakeholders, such as EASSH (European Alliance for Social Sciences and Humanities) and DARIAH (Digital Research Infrastructure for the Arts and Humanities).

SUPPORT XML ADOPTION BEYOND THE REQUIREMENTS

The level of technical compliance is not the same for journals and platforms on the one hand, and for repositories on the other hand. While, according to the guidance on the implementation of Plan S, journals and publishing platforms should provide “machine readable” formats (no requirement in terms of standards), repositories should store the full text in “XML in JATS standard (or equivalent)”. As any XML, HTML or even plain text can be considered a machine readable format, the requirement for repositories appears to be much higher. In particular so, considering that most of them do not meet the criteria currently. The same holds also true for many publishing platforms and journals. Therefore, the criteria for technical compliance for journals, platforms and repositories should be aligned.

If cOAlition S wants to impose XML across the whole sector, the decision should be fully informed by a calculation of the costs it would imply. It also needs to take into account how cOAlition S intends to support especially small size, community-supported, and scholarly-led repositories, journals, and platforms which lack the financial resources to upgrade their technical capabilities within a short time-frame. Without that support, the risk is high that those crucial stakeholders are immediately excluded from the competition for the benefit of already dominant capital-intensive big size players, entailing a further concentration and hindering competition in the market. Therefore, we recommend that cOAlition S members include in their funding programs specific actions to support the adoption of XML production workflows and, more generally, the development of a robust scholarly communication infrastructure owned by the academic community.

Regarding the choice of XML JATS as a standard, cOAlition S should be aware that in the Social Sciences and Humanities, XML TEI is a well known and established standard that must explicitly be acknowledged to be at least an equivalent to JATS. This is particularly important for the next stage of the Plan S implementation when other research products, such as academic books and critical editions, will have to be considered.

ALLOW MORE LICENSING FLEXIBILITY

The choice of cOAlition S to adopt a CC-BY license by default must be discussed at two levels:

- 1) The licensing requirements should include a discussion on multi-licensing, which allows the application of different licenses on different formats under which the same content can be disseminated. Therefore, the implementation guide should precise that the licensing requirement applies to at least one but not to all formats. This allows the development of innovative business models for Open Access publications on the one hand, but also partnerships with trade publishers who help researchers in reaching out to non-academic audiences through print editions on the other hand. This is of particular importance to the Social Sciences and Humanities where a substantial part of the publications can impact the social debate.
- 2) The CC BY-ND license should be carefully considered and not discarded the way the guidance document currently does. While it is true that the CC-BY 4.0 license protects the integrity of the work by requiring any modification of the content to be fully indicated, it does not preclude the possibility to include the content as it is in a larger collection, compilation, or in work that can pursue particular ideological or political objectives. The issue is crucial for research in the Social Sciences and Humanities, where the research objects are people in their social and cultural life, i.e. subjects. As a consequence, those researchers work under specific ethical conditions that drive them to keep control over the subsequent usage of their work and to prevent further political or ideological instrumentalization of their discourse.

cOAlition S acknowledges the challenge of including third party material to which it could be impossible to apply a CC-BY license and allows for more restrictive licenses in these cases. This can lead, however, to highly complex situations with publications embedding several licenses applied to different parts of the content. We recommend a more pragmatic approach that, on one side, allows for more restrictive licenses on publications when it is required by third party materials, and on the other side, make eligible licensing costs on third party materials in funding programs.

ACTIVELY SUPPORT DIAMOND OPEN ACCESS

The Plan S implementation guidance pays much attention to Gold APC (article processing charge) journals. This concerns the transparency and capping of APCs, as well as hybrid business models to ensure that publications in journals following these business models are always considered within transformative agreements which allow hybrid business models as transition and not as final. More work should be done, nonetheless, on non-APC Open Access journals (known as “Diamond”), of which, according to DOAJ (Directory of Open Access Journals), more exist compared to Gold journals (9173 against 3299), particularly in the Social Sciences and Humanities. cOAlition S should allow for funding mechanisms to support Diamond journals which otherwise could be tempted to move towards Gold APC models to be eligible to receive cOAlition S grants.

RECOMMENDATIONS TO GO FURTHER

OPERAS acknowledges the important work done by cOAlition S to provide concrete guidance on the implementation of its plan, which well adapts to many different situations. However, the focus seems to be mostly on the largest publishers with mixed models, as well as on transformative agreements. Much less attention is paid to the majority of publishers, even those publishers that are already fully Open Access and compliant with Plan S. We think that additional commitments could be taken, particularly to support small-size, community-owned publication venues which are essential for the diversity of the publishing ecosystem. The following suggestions could be taken into consideration by cOAlition S:

- Allow for block grants for publishing projects where the platform must be developed to become Plan S compliant.
- Allow for block grants to develop long-term publishing projects such as journals or other types of network activities among researchers.
- Allow block grants for alternative publishing entities such as datasets, audio and video content, interactive media, learning material etc.
- Ensure that reporting about publishing activities is transparent and takes the international diversity and collaboration into account.
- Include registration in DOAB to the requirements for OA books.
- Add clearer guidance on best practices for metadata of different types of publications and other digital objects to ensure that publications can be aggregated and integrated in many information flows.
- cOAlition S should work closely with a wide variety of research ministries, evaluation agencies and institutions to align rewards and incentives policies with the goal to “make full and immediate Open Access a reality,” otherwise researchers, particularly early career ones, could be trapped in the discrepancy between research grant policies and career evaluation policies.