

Helmholtz libraries feedback on the Guidance on the Implementation of Plan S

The undersigned Helmholtz (HGF) libraries appreciate Plan S' aim for a scholarly publishing system that provides full and immediate Open Access for publicly funded research. We welcome the opportunity to provide feedback and would like to comment on the compliance requirements in view of our duty to provide information and the best possible information architecture to our scientific staff and guests.

About the HGF libraries

The Helmholtz Association of German Research Centers was created in 1995. Its mission is to contribute to solving the major challenges facing society, science and the economy by conducting top-level research in strategic programs within the six research fields: Energy, Earth & Environment, Health, Aeronautics, Space and Transport, Matter, and Key Technologies.

The libraries of all HGF research centers provide information for the scientific staff and guests and support the publication process.

Feedback on the Guidance on the Implementation of Plan S

1. Aim and Scope

“cOAlition S does not favor any specific business model for Open Access publishing or advocate any particular route to Open Access given that there should be room for new innovative publishing models.”

It's necessary to take other OA models into account for instance such that do not require APCs (e.g. consortia funding mechanisms, freemium services, collaborative approaches, DiamondOA...).

“The guidance is directed at cOAlition S members and the wider international research community.”

An excessive gap between countries with Plan S-members and countries without Plan S-members must be avoided. (cf. findings of the study [“Evidence of Open Access of scientific publications in Google Scholar: a large-scale analysis”](#))

“The journal/platform must provide automatic APC waivers for authors from low-income countries and discounts for authors from middle-income countries.”

More options to support countries with low OpenAccess-output would be helpful. (OpenAccess has to be fair, see [infographic “OA Benefits”](#) / [adapted infographic](#)) There should be processes or strategies to support countries and disciplines with no to only few OpenAccess-options. How can/will funders help to assist being Plan S-compliant?

2. Plan S Compliance

“All scholarly articles that result from research funded by members of cOAlition S must be openly available immediately upon publication without any embargo period....”

We acknowledge that this addresses the situation that there are too many publishers that do not allow an immediate deposit: “According to a December 2017 [analysis](#), only around 15% of journals publish work immediately as open access [...]— financed by charging per-article fees to authors or their funders, negotiating general open-publishing contracts with funders, or through other means.” (See <https://www.nature.com/articles/d41586-018-06178-7>)

The experience with some publisher shows that “**openly available**” does not always include the **absence of technical barriers**. For example OSA Publishing and APS are known to require the solving of captchas before the full text can be downloaded. Such restrictions are against the Budapest Open Access Initiative declaration (see <https://www.budapestopenaccessinitiative.org>):

“By “open access” [...], we mean its free availability on the public internet, permitting any users to read, download, copy, distribute, print, search, or link to the full texts of these articles, crawl them for indexing, pass them as data to software, or use them for any other lawful purpose, without financial, legal, or technical barriers other than those inseparable from gaining access to the internet itself. The only constraint on reproduction and distribution, and the only role for copyright in this domain, should be to give authors control over the integrity of their work and the right to be properly acknowledged and cited.”

NB: This problem is addressed in 9.1, but should be stated here as well.

“cOAlition S intends to work with the Directory of Open Access Journals (DOAJ) and the Directory of Open Access Repositories (OpenDOAR) to establish mechanisms for identifying and signaling whether journals/platforms and repositories, respectively, are in compliance with the cOAlition S requirements.”

cOAlition S should also work together with **SHERPA-RoMEO** (<http://www.sherpa.ac.uk/romeo/index.php>) and initiatives like [thinkchecksubmit](#) / [thinkcheckattend](#) to foster the implementation of quality check e.g. by the creation of new tools for a) funders, b) researchers and c) journal/ publishers/ repositories such as the [DINI-Validator/OAN-validator](#) that was implemented into the project [Open Access Repository Ranking](#) (see [OARRproject details](#) slide 3).

While we agree on the general principles of Plan S, there should be a clear distinction in the guidelines between publications in Open Access journals and publications in Open Access platforms. Publications submitted to the latter do not need to undergo a peer-review process.

It seems that there is no commonly accepted definition of “**scholarly publications**”. Hence the guidelines should define this term. “**Scholarly**” should not be considered synonymous to “**peer-reviewed**”.

4. Supporting Quality Open Access Journals and Platforms

“cOAlition S intends to jointly support mechanisms for establishing Open Access journals, platforms, and infrastructures where necessary in order to provide routes to open access publication in all disciplines. cOAlition S explicitly acknowledges the importance of a diversity of models and non-APC based outlets.”

A level system of the funding level/ with different funding levels would be good so that the complete funding won't be prevented by only one exclusion criterion. Maybe, alternatives or suggestions should be offered when only 1 or 2 criteria aren't met to enable the applicant to work on being Plan S-compliant. (Maybe, time to readjust would be good.).

In order to support alternative models, there should not only be demerits in the compliance check but maybe also plus factors for honoring alternative ways to fulfil a specific criteria.

“cOAlition S members will collectively establish incentives for establishing Open Access journals/platforms or flipping existing journals to Open Access.”

This sentence has to be more explained by some examples for conceivable or already planned incentives.

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

The registration in the DOAJ may be incompatible for hybrid journals with a transformative agreement.

Journals that have been removed from DOAJ for legitimate reasons (e.g. “fake journals”) and simply re-register must not be considered as being compliant.

Plan S should not only emphasize the OpenAccess-aspect but also the journal's/ publisher's/ platform's quality via fostering the implementation of quality check e.g. by the creation of new tools for a) funders, b) researchers and c) journal/ publishers/ repositories (see above, comment in 2. Plan S Compliance)

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

A crucial point is not only that the full text is available in a machine readable format, but also in a standardized format that is suitable for archiving purposes (e.g. **pdf/a**). The machine readable format must also be standardized and **not proprietary**.

10. Deposition of Scholarly Content in Open Access Repositories

10.1 Requirements for authors and publishers:

Coalition S should remove “**peer review**”.

Quality assurance can also be obtained by other means than “**peer-review**”. E.g. the articles in a conference proceeding are quality assured by the editors, which is a process that is not COPE (journal) “peer-review” compliant. (See https://publicationethics.org/files/Principles_of_Transparency_and_Best_Practice_in_Scholarly_Publishingv3.pdf).

10.2 Requirements for Plan S compliant Open Access repositories:

It is not clear what “**automated ingestion**” means. The idea is probably to ensure that the submission process is relatively easy. The decision what to include, must lie at the repository.

It is not clear what equivalent to “**XML in JATS**” means. Clearly it cannot be the responsibility of a repository to convert documents into XML in JATS, while for journal/platforms “only” machine readable full text is mandatory.

The term “**continuous availability**” must be specified (e.g. 100% availability is not achievable). The same applies to the term “**Helpdesk**”.

11. Transformative Agreements

The undersigned HGF libraries fully support the Plan S principle that the “**hybrid model of publishing**” is not Plan S compatible.

We believe transformative agreements not only need at least “a clear and time-specified commitment to a full Open Access transition”, e.g. they must ensure that the whole of the journals considered is transformed into a (non-hybrid) Open Access journal, but the guidelines should also **explicitly specify a latest point** of time after which the transition must be completed.

In both, Plan S and the guidelines compliance of an article is defined via publishing in a compliant Open Access journal or compliant Open Access platform (See 2. Plan S Compliance):

It is not clear, what “**compliance of an article**” means in case a “**journal is covered under a transformative agreement**”:

- Does it mean that it is sufficient that there exists (somewhere) at least one transformative agreement and the article in question is published OA in such a journal to be compliant?
- Or does this only apply to articles that are published under the said transformative agreement? This is the interpretation that we support.

The implication for “**‘offsetting’ and ‘read & publish’ models**” is not clear:

- What does “**recognize**” mean?
- The applicable maximal transition period should be stated.
- Do these agreements count as “transformative”?

- What does this mean for the compliance of an article that is published in a journal under such a model?
- The same question as in the previous paragraph arises.

In the paragraph “COAlition S acknowledges existing transformative agreements. However, from 2020 onward, new agreements need to fulfil the following conditions to achieve compliance with Plan S.”, “**new agreements**” should be changed to “new **and renewed** agreements”.

After the last bullet point the statement from Section 2. Plan S Compliance, needs to be added: “**The negotiated** agreements **need** a clear and time-specified commitment to a full Open Access transition.”

We understand that e.g. DEAL and SCOAP³ are “**read & publish**” and “**offsetting**” models, respectively. However in their current form a renewal of these contracts would not fulfill compliance with Plan S (e.g. contracts not publicly available or no scenario for full OA conversion)

The obstacles are explained by Rob Johnson:

“... Anyone who has sought to navigate the varying and potentially conflicting OA requirements of funders, institutions and publishers will recognize the ‘overlapping prerogatives’ of current actors in the OA landscape, and the ‘mandate messiness’ that results.⁸⁹ Harmonization is a desirable goal, but the intention should not be to impose a homogeneous approach which fails to take account of varying national and disciplinary cultures. Instead, the principles must operate as an overarching framework within which local actors – funders, institutions, publishers and learned societies – remain free to build trust and create a diverse environment favorable to discovering better solutions to problems.⁹⁰ ... The establishment of an equitable, efficient and sustainable academic commons is an ambitious goal. Its successful governance will require that, as circumstances change, rules – and even principles – are adapted accordingly.”

<https://insights.uksg.org/articles/10.1629/uksg.453/> / <http://doi.org/10.1629/uksg.453>“

Submitted by the libraries of (alphabetical order):

DESY Deutsches Elektronen-Synchrotron

DLR Bibliothek, Deutsches Zentrum für Luft- und Raumfahrt

DZNE Deutsches Zentrum für Neurodegenerative Erkrankungen e.V.

FZJ Forschungszentrum Jülich GmbH

GEOMAR Bibliothek Helmholtz-Zentrum für Ozeanforschung Kiel

GFZ Library and Information Services

HZDR Helmholtz-Zentrum Dresden - Rossendorf

HZI Helmholtz-Zentrum für Infektionsforschung GmbH Braunschweig

UFZ Bibliothek Helmholtz-Zentrum für Umweltforschung GmbH Leipzig