Guidance on implementation of Plan S
Feedback from University of St Andrews Library

The fundamental aims of Plan S and decisive call to action by cOAlition S are commendable and we can thoroughly support the intended move to immediate open access research. However we believe there are some issues with the current Plan S documentation and guidelines, and some areas that need clarification.

https://www.coalition-s.org/why-plan-s/

The **preamble** states "...*publications that are generated through research grants that they allocate, must be fully and immediately open and cannot be monetised in any way*."

It is not clear why publications cannot be monetised and the implementation guidelines suggest both authors and end users could/should 'monetise'. 1) As authors retain copyright it is conceivable that they could republish the work in some compatible way that attracts income, and this could be an efficient and fair model to fund additional research. 2) The CCBY licence explicitly allows commercial reuse by others (as stated in section 8 of the guidelines)

The intention to require models where publishing services are charged for will hopefully reduce commercial profits, but may penalise societies who run a model precisely to generate surplus to fund scholarly activities. This should be recognised explicitly. We welcome the current work being commissioned by Wellcome Trust and UKRI to identify how societies' activities could be funded directly and transparently. Plan S should also acknowledge the range of small academic-led publishers which charge no APCs but play a crucial part in the ecosystem.

https://www.coalition-s.org/10-principles/ **Principle 6**

"The Funders will ask universities, research organisations, and libraries to align their policies and strategies, notably to ensure transparency;"

Implementing the UKSCL model institutional OA policy (http://ukscl.ac.uk/) would be one way to align policy and strategy across the University sector, ensuring the balance of rights remains with authors and institutions and open access can always be achieved via institutional repositories - at least during the years of transition. We agree with the feedback provided by the UKSCL community.

https://www.coalition-s.org/feedback/

Section 8 of the Guidance also covers Third party content, stating it is "*not affected by these requirements.*" Experience with meeting OA requirements for REF 2021 suggests for some disciplines it is not that simple. In Art History content is often sourced from cultural institutions and domains that do not have an open culture. While a CCBY licence can allow content to be marked with an alternative licence, copyright holders may not allow

07 February 2019

reproduction within an openly licensed article, or only at significant cost. As images are central to the research, we have found around half of articles cannot be deposited openly, with the others having images redacted and rely on links to the published version under subscription.

We urge cOAlition S to consider cases where full and immediate OA is not (yet) realistic.

In **Section 9 of the Guidance** it would be worth again explicitly recognising the contribution of small publishers who already operate fair and transparent models, but who may be swept away by the technical requirements. The notion of 'transitional' arrangements should be applied to allow small players to focus on 'staying open' rather than 'becoming compliant'.

Section 10 Deposition of Scholarly Content in Open Access Repositories - As transformative agreements are to be allowed for publishers, so they should be for mechanisms that achieve immediate open access via repositories. We suggest a path that sees immediate OA as a first significant step, with CCBY licensing following once a body of evidence is available to reassure authors in AHSS that they will not require NC or ND clauses.

Section 9.3 – the criteria are only *recommended* for journals but *required* for repositories (**10.2**). This seems unreasonable, and is likely only to be achievable by large national and international repositories. This runs the risk of marginalising institutional repositories (IRs) which are essential to the network of systems promoting and preserving all scholarly output (not just that from certain funding streams). Journals/publishers are the primary source and have control over the format of content, though as already noted some of the technical requirements could be difficult to achieve by small non-APC based publishing platforms. The effort and resource required to convert authored manuscripts outside of commercial publishing systems would be huge - this burden should not fall to repositories, and their value should be properly expressed in Plan S. We broadly agree with the COAR statement (https://www.coar-repositories.org/files/COAR-response-to-implementation-of-Plan-S-February-6-2019.pdf) and advocate a continuation of the deposit processes already successfully embedded in UK institutions. UK IRs play a crucial role in compliance for the Research Excellence Framework, so they should be fully supported rather than have barriers imposed that could have adverse consequences for the visibility of UK research as a whole.

Section 11. Transformative agreements - as yet none of these appear to transition to fully OA *journals*, but only to enable a specific subset of articles (usually nationally) to be OA. By definition this sustains the hybrid model. These agreements are being negotiated now and it may be difficult to revisit them to ensure true Plan S compliance unless guidelines are clearer on the expectations of a decisive move away from hybrid.

Finally, we acknowledge it is good to have clear aims on culture and incentives underpinned by responsible metrics and intentions of DORA. We hope that the process of awarding grants truly supports this.

Jackie Proven
(Repository and Open Access Services Manager, on behalf of University of St Andrews Library)

07 February 2019