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ACADEMY OF FINLAND: FEEDBACK ON PLAN S IMPLEMENTATION GUIDANCE

Plan S has a major and positive influence on many crucial spheres of the research community, such as openness, quality and impact of research, assessment practices, knowledge distribution habits and channels, and training of future researchers. The implementation guidance of Plan S includes key practices related to these principles and presents an important document on how Plan S targets will be influenced and implemented.

The Academy of Finland finds the open consultation for public feedback very important and emphasises that open dialogue will be essential also throughout the implementation of Plan S.

Overall, we foresee that the guidance under consultation includes clear practical steps and choices for achieving the Plan S goals. In our view, these principles are substantial in supporting the global research community in its transfer process towards a fair, economically sound and open publication ecosystem. It is indeed important that research funding organisations, too, now join the efforts to support open access. At the same time, we need to ensure that our actions build on a realistic understanding of the current situation and that the planning and delivery of actions are done in close collaboration with international and national players.

The Academy of Finland has organised two consultative events to discuss with the Finnish scientific community and hear their questions, concerns and views during the consultation period. The questions and comments received have been considered in preparing this feedback for cOAlition S. Although we endorse the implementation guidance, we do think that there are some issues that require further discussion and clarification by cOAlition S. These issues and views are discussed below.

Strong and open collaboration with international and national players required

Science and research are inherently international. Therefore, we acknowledge the measures planned for close and continuous collaboration with other international players in the field of open science, such as DOAJ, Dora, OpenAire, SherpaRomeo and ESAC. It is vital that the Plan S actions are developed together with these and other relevant players, such as the Confederation of Open Access Repositories (COAR).

While the number of cOAlition S members is still fairly limited, there are many other open access initiatives as well. Multiple relevant organisations and institutions have voiced their support for Plan S, open access and DORA. We suggest that cOAlition S better clarifies how it collaborates and works with these other members of the scientific community. This would ensure that the Plan S principles will not affect only those researchers that work with funding from cOAlition S members, but also in a fair and equitable way the research community at large.

We should strive to find the best ways to support a smooth transition towards open access through cooperation and cocreation, not only with international organisations but also with research performing organisations, learned societies, researchers and publishers – this cannot be emphasised enough.

Plan S actions should be developed side by side with new research evaluation practices

Plan S is set to change the open access mandates globally. In order to succeed, a similar change needs to be achieved for research evaluation practices. This will require further global collaboration. The links between Plan S and research evaluation and meritisation practices, especially DORA, are crucial. COAlition S needs to show how its plans will change its members' evaluation practices and how it seeks to develop global understanding and practices related to these issues so that scholars working with funding from cOAlition S members will not be dismerited in other contexts.

Young researchers are vulnerable in the midst of changes that affect the whole research community. COAlition S needs to notice that doctoral training programmes and individual academic mentors' teaching, as well as assessment practices, indeed take into account and support the Plan S principles. In addition, while young researchers might feel some pressure to publish their work in non-Plan-S-accepted environments, such behaviour should not be sanctioned in the near future in a way that hinders their academic careers.

Plan S includes development of international infrastructures and services for open access

We welcome Plan S support for international services and infrastructures that are required to support and maintain the scientific publications ecosystem needed for Plan S practices. However, the implementation guidance could include more precise information on what kind of work is actually needed for such infrastructures. Further details could also be provided on how cOAlition S members will seek to support these services in the future.

The best combination of open access formats and publication venues needs to be supported

We agree with the implementation guidance target that all scholarly articles that result from research funded by members of cOAlition S must be openly available immediately upon publication without any embargo period.

However, although significant progress has been made over the last decades, many scientific disciplines and areas are still not in a position to benefit solely from high-quality gold open access journals. To ensure that Plan S will achieve its targets, it is vital to make sure during the transition period that researchers are able to choose the best combination of publication venue and open access format for their scientific publications.

At the same time, we need to develop new ways of providing strong international support for universities and other research performing organisations in their negotiations with publishers to move towards a full open access future for scientific publications.

Green route should stay as part of Plan S implementation guidance

In the context of supporting a smooth transition towards the targets set, we find not only gold open access but also green and hybrid open access very important.

Although highly debated, the green route for open access is an important method for achieving the Plan S aims, not only in international settings but also in developing national academic publishing ecosystems. The traditions of and support for open access varies considerably between scientific disciplines as well as across domestic research communities. Blocking the green route or placing too strict demands for it in the implementation of Plan S could have serious consequences for the scientific community and negatively affect the equal opportunities of researchers.



The current suggestion on green route immediate compliance should remain part of the available possibilities. However, while we support standardised technical choices concerning the repositories needed for green open access, cOAlition S should not make these standards too heavy. Alternatively, it should offer a transfer period for achieving these demands, much like the transfer period for hybrid journals at present.

Plan S gives strong support for developing and creating new publication models and platforms in order to advance Plan S development. We recommend that cOAlition S, together with the scholarly community, develop more precise plans to ensure that Plan S truly can achieve its targets.

Mandate for licences is needed, but so are alternatives for licences

All open access publications need to have a licence. The implementation guidance concentrates on a few well-chosen alternatives. It should be noted that there are situations that are ill-suited to the planned use of licences (e.g. if the said article includes third-party material and therefore cannot be shared and used in its entirety). COAlition S should note these variations in research article contents in its guidelines.

Practical schedule needs to be clarified

To help inform the potential standardisation of fees or APC caps, cOAlition S will commission an independent study on open access publication costs and fees (incl. APCs). The Academy of Finland supports this action and recommends that a similar action be taken after a few years in order to analyse any changes in the situation. Any APC standardisation developed should allow for constant platform development and innovations in publishing.

Plan S needs to show sooner rather than later how its supporters may take the first practical steps towards achieving 100% open access. While the first principle sets 1 January 2020 as the definitive date for this, the current transfer choices and methods and alternatives described in the implementation guidance already show that consistent work is needed at least up to 2025 and most likely beyond that.

While it is important to maintain the vision, it is equally important to show that transfer periods as well as coordination efforts and practices are planned and used in such way that the practical challenges for researchers to implement open access in their own work remain as minimal as possible. It is essential to maintain a stepwise approach that reflects the current situation, changes, challenges and possibilities.

