

## Response to Plan S from the Glucksman Library at the University of Limerick

The University of Limerick (UL) with over 15,000 students and 1,400 staff is an energetic and enterprising institution with a proud record of innovation and excellence in education, research and scholarship.

The University of Limerick has primarily supported Open Access via the Green route. Our Open Access repository, ULIR, has been OpenAIRE compliant since 2015. This and other measures including our membership of RIAN, the Irish national aggregator for Open Access research publications ensures that our funded research is compliant with funder mandates.

The Glucksman Library welcomes the aims of Plan S and ambition of cOAlition S to make publicly funded research publications fully and immediately available Open Access.

The Glucksman Library is fully committed to a transition to Open Access, but there are concerns about the approach Plan S is presenting. These concerns are outlined below using the framework of the Plan S feedback questions.

### **Is there anything unclear or are there any issues that have not been addressed by the guidance document?**

#### **Funding**

1. The implementation guidelines state “cOAlition S members will ensure financial support for OA publishing via the prescribed routes to compliance” and that grants can be used to finance APCs. In many cases this is already the case, however the size of the APC payments means that researchers must divert funds that originally would have been used to support the research into paying publication costs. It is our opinion that individual research grantees should not have to use these funds to pay for publication and the funding for this should be kept separate from the funding that supports the research. In Ireland the current OA model used by funders is for Green OA, therefore research institutes including ourselves do not have a mechanism for paying APCs.
2. One argument for Plan S is that there are sufficient funds in the system already and it is how we direct it that matters. However in the current model, these funds are tied up in multiyear deals. Libraries and research institutions are legally bound by these agreements. Therefore we may face a funding crisis during their lifetime. An alternative funding model/source during this transition period needs to be identified.
3. Another concern is the size of the APCs which vary widely. There is a clear incentive to publishers to maximise revenues by charging the maximum APC allowed and publishing in larger quantities.
4. The aim to make access to research more equitable is a good one. However there are fears that a 2 tier system of publishing based upon who has funding may emerge. A large proportion of research conducted by the University is unfunded. If publishers were to change their business models to an APC gold model as advocated by Plan S then many researchers may be priced out of their preferred venue to publish. This would also have severe consequences for ‘Citizen Scientists’, the policy for which is part of the European Commission’s dossier on Open Science<sup>1</sup>. These researchers who generally work outside the traditional research intensive organisations may find their publication routes blocked by excessive APCs.

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<sup>1</sup> European Commission policy on Citizen Science available at <https://ec.europa.eu/digital-single-market/en/citizen-science> accessed on 24/01/2019

5. There are also concerns about smaller society publishers. Many of these publishers charge minimal subscriptions and use any profits to fund initiatives that benefit the discipline at large. Currently these would not be Plan S compliant

### **Green Open Access.**

The importance of the Green Route to Open Access must be stated. Green Open Access, while not faultless, is a cost effective and accessible route to Open Access for most researchers. Through its distributed network it has on the main outperformed the Gold route by a large margin in delivering Open Access. For example, using the data provided by the Open Science Monitor<sup>2</sup>, the United Kingdom which has had both a policy in favour of Gold and the funding mechanism to deliver it has delivered 28% of publication from Green OA versus 8.2% via the Gold route. Therefore the role of Institutional Repositories in delivering Open Access should be supported. The current Plan S guidelines for repositories are overly onerous for individual repositories and show a lack of awareness of the repository landscape. In particular the role played by aggregators such as the OpenAIRE portal which add value added services such as text and data mining to the publications they harvest from the individual repositories. It is our opinion that many of the guidelines in Plan S for repositories can and should be carried out at the aggregator level. For that reason we strongly concur with the response submitted by the Confederation of Open Access Repositories (COAR) and recommend that its advice be adopted.

### **Licensing**

Plan S recommends that CC-BY be the default license. While we understand the need for this is to ensure full text and data mining services. We query the practicality of this, particularly in disciplines which use data and other information sources which are covered by 3<sup>rd</sup> party copyright, which precludes them from applying CC-BY.

Additionally our researchers have raised concerns that the use of CC-BY will mean their work is commercialised before they have a chance to do so themselves. The use of CC-BY-ND licenses would prevent this. We recommend a wider discussion around licensing should be undertaken.

## **2. Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?**

### **Compliance**

The current Plan S implementation guidelines do not contain any information on how compliance will be monitored. The monitoring of Open Access and the enforcement of mandates by funders is something that has been lacking and has been a barrier to implementing previous OA policies. Therefore a clear strategy for monitoring and enforcing OA is essential.

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<sup>2</sup>Trends for open access to publications

[https://ec.europa.eu/info/research-and-innovation/strategy/goals-research-and-innovation-policy/open-science/open-science-monitor/trends-open-access-publications\\_en](https://ec.europa.eu/info/research-and-innovation/strategy/goals-research-and-innovation-policy/open-science/open-science-monitor/trends-open-access-publications_en) Accessed on 24/01/2019