SPARC Europe's response to the Guidance on the Implementation of Plan S

1 Feb 2019

Introduction

Plan S is an initiative to stimulate Open Access publishing and was launched in September 2018. Its key principle is to:

"By 2020 scientific publications that result from research funded by public grants provided by participating national and European research councils and funding bodies, must be published in compliant Open Access Journals or on compliant Open Access Platforms."

A group of national research funding organisations and charitable foundations – cOAlition S – have signed on to implement, in a coordinated way, 10 principles related to Open Access publishing. In November 2018, SPARC Europe responded to this new policy and its principles with various implementation guidelines, many of which Plan S subsequently adopted. Then in late November, Plan S published its draft guidance on the implementation of Plan S requesting public feedback; two questions were posed:

1. Is there anything unclear or are there any issues that have not been addressed by the guidance document?
2. Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?

SPARC Europe has issued its response to these questions below.

Plan S and its cOAlition of funders promises to accelerate the transition to Open Access in Europe in 2020 with meaningful incentives, which SPARC Europe sincerely supports. Key funders of research in cOAlition S are committing to driving no-nonsense change in scholarly communications on a range of levels, and they are committed to funding that change to ensure it happens. We are convinced that funders, research communities and libraries are well positioned to transform and update the scholarly communication system in Europe and beyond. Plan S principles are bold and have the potential to improve the way we share publicly funded research openly across the globe. However, Plan S's success is dependent on how far the funder, publishing/communication channels, and research and library communities are enabled and supported to implement these principles; and this further requires agreement on the guidance and requirements to comply with these principles as outlined in the *Guidance on the Implementation of Plan S.*

What is important about the implementation of Plan S is that it focuses on making access to public research results fully open as quickly as possible bringing science back to the academic community. SPARC Europe is open to a range of fair business

models to transition to OA, including non-APC models, as long as transition means transition and at fair prices. Closing transformative agreements amongst large commercial publishers is key to moving from a pay to read system to a pay to publish system. Providing authors with a realistic and appropriate direction on licensing content for re-use is also essential to enable the maximum use of publicly funded research.

cOAlition S's commitment to support and fund various forms of Open Access scholarship is fundamental to Plan S's success. Plan S can also affect significant change to the current practices of large commercial publishers around OA scholarly communication. Limiting the costs of OA traditional journal publishing is key here. Funders can help manage this most effectively by collectively establishing — and monitoring — restrictions, and by, above all, funding open access to research outputs to make them rapidly available and re-useable.

We believe that Plan S has great potential to increase the impact of research across the research life-cycle stimulating Open Access to a range of scholarly and scientific outputs and channels for the broadest range of disciplines. Similarly, repositories, publishing platforms and certain other scholarly communication venues need to be treated on an equal footing to journals as viable locations to disseminate that content, granted quality standards remain high. Ambitious yet realistic quality standards are necessary for compliance to work.

Lastly, time is of the essence as we, like cOAlition S, are committed to accelerating the move to Open Access. However, it is vital that appropriate time be allowed for the broad adoption and implementation of these 10 principles to take place and for sound sustainable solutions to be found. For example, until we change the way that research is evaluated, which is currently largely dependent on article output, the success of Plan S will have serious limitations.

SPARC Europe and its Board addresses the two questions posed to the community on the **Guidance on the Implementation of Plan S** below.

1. Is there anything unclear or are there any issues that have not been addressed by the guidance document

1.1 The following needs more clarification

1.1.1 On publication costs and ensuring financial support for OA publishing

We welcome it that "cOAlition S will commission an independent study on Open Access publication costs and fees (including APCs)" to make informed decisions on funding OA. Plan S needs to understand the costs of OA publishing, be it for APCs, or other business models for OA. This will need to address both large and small publishers since larger publishers have the resources to absorb more risk. It is important for cOAlition S funders to collectively bear the financial risk of implementing the system, otherwise small publishers and innovative alternative

platforms will not be able to compete. Differences between countries should also be considered. Such considerations are necessary if we are to find a balanced and fair means to fund OA. An essential outcome of this study is that it inform funders on what is, in fact, a fair level of funding for them to commit to support Plan S. "cOAlition S members will ensure financial support for OA publishing via the prescribed routes to compliance".

When it comes to funding OA, in order to fully understand the financial impact of OA on authors and their institutions, we request that Plan S clearly specifies responsibilities in terms of funding. Will cOAlition S members fully support or partially support OA publishing / scholarly communication? And if partially, in which cases or circumstances? Clarity on who will manage these funds, and how, is also essential. I.e. will funders centralise the payment of APCs as in the Gates Foundation's CHRONOS service or in the European Commission's FP7 Post Grant Open Access Pilot. We ask for payments outside of subscriptions to be centralized on a funder level, which results in fewer OA monitoring and administrative responsibilities for research institutions and their libraries.

As regards the transparency of costs for APCs, we fully support the transparency of costs and fees to those institutions that pay APCs and suggest that the following addition be made: "cOAlition S calls for full transparency and monitoring of Open Access publication costs and fees." We would like to emphasise that for COAlition S to make informed decisions on funding OA, acquiring systematic Open Access APC pricing data is critical – including information on waivers and discounts. We ask for this data to be consistently provided by publishers, and then analysed and communicated; this will also serve to feed transformative agreements. We do not believe it viable or helpful to acquire data on all publishing costs from all publishers since larger publishers will have mechanisms to undermine smaller ones where one cannot compare like with like. Achieving true transparency on all publications' costs from large commercial publishers is desirable but unlikely. However, as an absolute minimum, we ask Plan S to require that the building blocks that OA publishers use to calculate OA costs for their publications be provided, with real figures, where feasible, together with information on market influences.

1.1.2 On transformative agreements

"cOAlition S emphasises that the individual cOAlition S members are not obliged to enter into transformative agreements nor to fund APCs that are covered by such agreements."

We suggest that cOAlition S members be "encouraged to enter into transformative agreements" rather than "not obliged to enter into transformative agreements" to more rapidly change the current way that science and society pays for reading and publishing articles. This would also be aligned with point 11 which states that Transformative agreements: "from 2020 onward, new (transformative) agreements need to fulfil the following conditions to achieve compliance with Plan S."

Furthermore, we request that Plan S places more pressure on publishers by providing guidance on how transformative agreements should be made, as well as

how prices should *not* be set and on what basis. We request aligning this with approaches being taken by OA2020 and by referring to the LIBER 5 principles for negotiations with publishers as a minimum starting point.

1.1.3 Repositories need to be put more on a par with Open Access journals or compliant Open Access platforms

"Scholarly articles are compliant with Plan S if they are published in compliant Open Access journals or on compliant Open Access platforms. In addition, cOAlition S will, under specified conditions, accept deposit of scholarly articles in Open Access repositories ..."

We suggest that repositories be listed on a par with Open Access journals and compliant Open Access platforms. Universities and other research performing organisations have made significant investments in OA repository services and infrastructure over the past decade. The result: today, these organisations host and manage more than 2000 repositories in Europe. We also suggest that the words "under specified conditions" in the above quote be removed to avoid confusion, since conditions are outlined for all types of publishing platforms under "Technical Guidance and Requirements".

"Deposit of research outputs in open repositories is recommended to ensure long-term archiving, research management, and to support maximum re-use."

We also ask that Plan S be amended to explicitly refer to repositories as core places for making material open access. In practise, repositories are a feasible and inexpensive means of making material open access to a global audience. We also request that "immediate deposit" is added to this sentence. Repositories are not only venues for storing journal articles in the form of a (Version of Record (VoR)) or an Author's Accepted Manuscript (AAM), but they are also places to share pre-prints, conference papers, posters, book chapters, white papers, video recordings, and a range of other academic output. They need to be considered on a par with other platforms or publishing venues, like journals – viable, practical and worthwhile places to share research results.

Extensive recommendations and requirements for repositories also seem unnecessary and could function to impede their being employed as viable alternatives to journal publishing. We are concerned that only very large or commercial repositories could comply with current requirements. As it is important to support a distributed and balanced system of scholarly communications, we request that several requirements become recommendations. For more on this see, below.

1.1.4 On funding Open Science infrastructure

"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."

Referring to the words "where necessary", how will cOAlition S determine when to fund what, and when not? Greater specificity is needed to assess the intended support and viability in delivering Plan S.

We request that Plan S jointly supports not-for-profit OA journals, platforms and open infrastructures.

Furthermore, we welcome the fact that specific tools, such as DOAJ, Open DOAR, Sherpa/RoMEO and ESAC, have been mentioned as valuable in helping Plan S monitor for compliance. These and other new services will be essential in this endeavour. Since Plan S mandates compliance, it needs to fund these afore-mentioned or other mechanisms at a level adequate to provide the required service to guarantee the infrastructure's accuracy, up-to-dateness, reliability and sustainability in the future. Service level agreements will be important.

We also suggest that Plan S consults with international Open Science infrastructure frameworks, communities or initiatives such as SCOSS when enquiring about where funds are needed to fund Open Access / Open Science infrastructure.

1.2   What needs to be further addressed

1.2.1   Scholarly communication rather than scholarly publishing

Plan S will help to reform the current journal publishing system and its business models, calling on publishers to be accountable for making journal articles immediately available Open Access. It is essential that Plan S policy bases its decisions for change on the practices of a range of disciplines: from life sciences, where a limited number of commercial publishers currently dominate, to the humanities or social sciences,which support scholarly communications cultures where far more publishers thrive. Due diligence must therefore be given to ensure that all communities benefit from the reform of the scholarly communications process – that one discipline does not benefit at the expense of others.

Furthermore, it is vital that a reinvisioned publishing system not be built entirely around the printed word. Plan S can help reinvent scholarly publishing. We strongly encourage Plan S to place a greater emphasis on and promote new forms of publishing, including new formats and applications, to reflect a range of scholarly communication processes in diverse research communities. Plan S has the capacity to endorse and support a vibrant scholarly communication ecosystem, i.e. stimulating its design, encouraging competition and by funding it, ensuring that it may thrive. Although the implementation plan states that "Plan S applies to all scholarly output that is reviewed according to accepted standards within relevant disciplines", we encourage Plan S to use the term "scholarly communication" rather than "scholarly publications or publishing" to formally embrace a larger scope of outputs in various forms.

We welcome the fact that

"cOAlition S does not favour 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" and that

"cOAlition S explicitly acknowledges the importance of a diversity of models and non-APC based outlets"

As part of this implementation plan and putting policy into action, we appeal to you to require cOAlition members to fund and incentivise authors to publish in alternative venues as well as traditional ones, e.g. in no-fee Open Access journals, overlay journals, university presses. Funding such venues will encourage competition and will contribute to their sustainability.

1.2.2   On licensing and rights

"cOAlition S recommends using Creative Commons licenses (CC)[2] for all scholarly publications and will by default require the CC BY Attribution 4.0 license for scholarly articles."

This sentence uses both the words "recommends" and "require". We suggest using the word "require" throughout and ask for the addition of the following "...allowing for exceptions in certain disciplines when using significant third party content and then clearly justifying why the CC BY license may not be used". This is to protect authors from certain disciplines that, for instance, have viable concerns about other works being derived from their work.

We support it that CC BY, CC BY-SA and CC0 licenses are required to allow for the broad re-use of research, and ask to add that "**CC BY-ND may be used in certain justified circumstances"** by disciplines that are dependent on significant third party content, for example.

We also endorse it that none of the CC BY-NC licenses may be used, including CC BY-NC, CC BY-NC-SA and CC BY-NC-ND.

Furthermore, under the section *Basic mandatory criteria for Plan S compliant Open Access journals and platforms* it reads:

> "The journal/platform must offer authors/institutions the option of full copyright retention without any restrictions, i.e. no copyright transfer or license to publish that strips the author of essential rights."

We request that this be adjusted to read: "The journal/platform may only grant a non-exclusive license for the submitted publication." to better ensure easy implementation.

1.2.3   On repository deposit

"cOAlition S recommends that all publications and also other research outputs are deposited in open repositories and request that publishers facilitate deposit."

We suggest changing the wording "request that publishers facilitate deposit" to "require publishers to change their OA repository policies to facilitate deposit" to enable immediate deposit under no embargo. This will significantly contribute to making more of a complete corpus of an institution's research output open access.

1.2.4   Viable solutions in repositories

Plan S could do far more to limit the requirements on repositories, effectively sending a message that they are a viable and inexpensive solution to Open Access rather than a burdensome and complex option. We consider certain requirements unnecessary to support the goals of Plan S, imposing costly and onerous requirements on institutions. We therefore ask that the following requirements be made recommendations instead. For more information on this, see sections 2.3 and 2.4:

- Automated manuscript ingest facility
- Full text stored in XML in JATS standard (or equivalent)
- QA process to integrate full text with core abstract and indexing services (for example PubMed)

1.2.5   Book chapters and monographs need to be immediately addressed

We ask that book chapters and monographs be addressed by Plan S now rather than at a later date and treated with equal importance to other forms of publishing so as not to delay reform in scholarly communications in the Humanities and Social Sciences, for example.

1.2.6   Evaluating Plan S

We suggest that by the time Plan S is implemented in 2020 that cOAlition S identifies and describes the Plan's intended impacts and consequences. This would provide a framework of expected outcomes for the 2023 review.

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

2.1   Reforming the way that research is evaluated goes hand in hand with Plan S

A critical success factor for the implementation of Plan S is that it be accompanied by a critical review of the way that institutions, research and researchers are assessed based on where and how often they communicate their research. Institutional rankings, research evaluation and career progression have become largely dependent on large commercial publishers where profit often is the first priority.

Some of Plan S's specifications for change in the current scholarly communications system do not yet quite mesh with current publishing practises and dependencies; it certainly challenges some. It is young researchers who are likely to suffer most immediately where a track record of esteemed publications is deemed essential in selected journals that may now not comply with Plan S requirements.

Unless we have positive incentives to help change the way that research is evaluated, we are concerned that Open Access to research will remain too piecemeal as has been the case for many years; it will be difficult for Plan S to realise its ambitions. It is therefore important for funders and institutions to review how they use the reputation of a journal or publisher as a proxy for quality and move towards a broader range of qualitative and quantitative metrics when evaluating research.

While new systems are being devised, it is uncertain whether or not these will be agreed upon and accepted by key academic stakeholders in time to deliver Plan S in 2020. It is therefore vital for cOAlition S partners to actively engage in this issue. We acknowledge that Plan S is taking steps to change this process where **"**cOAlition S members intend to sign DORA and implement those requirements in their policies." However, the ways in which authors and their institutions implement this concretely will be critical to the success of the implementation of Plan S. More guidance on what this means in practise should be provided by Plan S in this implementation phase. We therefore ask Plan S to require cOAlition members to actively advocate for developing, implementing and using new research indicators that employ a range of quantitative and qualitative measures, including Open Access and Open Science ones.

2.2 On mandatory quality criteria for Plan S compliant journals, platforms, and other venues

Although we welcome certain specified requirements, some are likely to break the backs of smaller, independent OA journals that make up the majority of OA publishers in HSS, for example. Many publishers do not have the financial means to purchase these services or to generate XML to make full text available in machine-readable format. Though important, we believe that it cannot be required, unless cOAlition S is willing to fund this as part of publishing costs to optimise access to its research. If made a requirement, this could be seen as a gift to the large commercial journal publishers since this is likely to force smaller journals out of the market.

On archiving and preservation, since long-term preservation or archiving infrastructure may not be available to all Member States, we strongly encourage Plan S to make "Deposition of content with a long-term digital preservation or archiving programme (such as CLOCKSS)" a recommendation unless it is ready to financially support those without this infrastructure.

In summary, the following specifications can be recommended but should not be required unless additional funding is provided:

- "Use of DOIs as permanent identifiers (PIDs with versioning, for example in case of revisions).
- Deposition of content with a long-term digital preservation or archiving programme (such as CLOCKSS).
- Availability of the full text (including supplementary text and data when applicable and feasible) in machine readable format (for example XML), allowing for seamless Text and Data Mining (TDM)."

2.3 On the deposition of Scholarly Content in Open Access Repositories: Requirements for Plan S compliant Open Access repositories

As to the requirement "to store full text in XML in JATS standard (or equivalent)", it is clearly of merit to enable machine-readable access to research results; thus we consider this a worthwhile recommendation. However, we do not support it being a requirement. We strongly believe that making this a requirement will indirectly sideline the majority of repositories since they are unable to comply, thereby indirectly favouring traditional journal publishing; and this is clearly not the intention of Plan S. An unintentional consequence of such a requirement could potentially hinder repositories by preventing their growth, use and participation. COAR, which represents a global network of repositories, confirms that it is currently highly exceptional for repositories to provide the storing of full text in these formats as a service; reason being, it requires extensive resources which most do not have. In summary, unless cOAlition S is willing to fund this as part of publishing costs to optimise access to research, we believe it cannot be made a requirement.

In fact, we suggest that the requirement be made for publishers to provide this content to repositories since they are often much better positioned to provide it.

2.4 On the deposition of Scholarly Content in Open Access Repositories: Requirements for authors and publishers

In the case that publishers do not allow immediate access to the final published version of the publication (Version of Record), we ask that Plan S makes it a requirement to publishers to provide institutions with the Author's Accepted Manuscript (AAM) for deposit in their repositories to enable open access to either one efficiently.

2.5 On Open Access Journals and platforms

We strongly recommend that Plan S specifically advocates for open peer review in its recommendations since open peer review helps increase quality reviews and encourages ethical practices such as completing reviews within a reasonable timeframe.

2.6 On the speed of implementation

After having worked for close to 20 years on OA policy and advocacy, striving to implement change in scholarly communications, we support the ambition to transition to Open Access as soon as possible. However, 2020 is the very near future. To help change the publishing practises of 1) a broad range of disciplines, including very specialised ones with unique scholarly communication structures, and 2) of many learned societies in a range of publishing environments and countries, and for the widespread adoption of OA amongst the research community, and for a fully, workable OA system to flourish, we believe that an extended timeline may be necessary. More time could be invested in understanding the needs and practices of learned societies and a range of disciplines to implement a realistic OA future together. A phased approach might therefore be used to achieve this goal starting with retaining copyright, prioritising depositing material in repositories, funding alternative publishing platforms and venues and ending with changing journal business models to transition to fully OA.