



Comments on Strengthening the Implementation of Plan S

Submitted: February 7, 2019

SPARC (the Scholarly Publishing and Academic Resources Coalition) is an international coalition of academic and research libraries committed to making ‘open’ the default in research education, applauds the ambitious goal of [“Plan S”](#) to make full Open Access a reality: ensuring that all research articles are immediately available, and fully re-usable by all. This goal mirrors the intent of the landmark Budapest Open Access Initiative (BOAI), crafted in 2002. The authors of the document—which includes SPARC—set out an ambitious, aspirational vision of what was made possible with the advent of the Internet:

“An old tradition and a new technology have converged to make possible an unprecedented public good. The public good they make possible is the world-wide electronic distribution of the peer-reviewed journal literature and completely free and unrestricted access to it by all...”

Critically, the intention was clear from the outset that Open Access itself was not the end goal, but rather a means to an end. The BOAI went on to describe the vision of opening up access to this crucial layer of information *in order to* achieve a sweeping vision of a more equitable environment for knowledge sharing:

“Opening up access to this information will accelerate research, enrich education, share the learning of the rich with the poor and the poor with the rich, make this literature as useful as it can be, and lay the foundation for uniting humanity in a common intellectual conversation and quest for knowledge...”

The BOAI rightly recognized the current system has structural problems that extend far beyond unacceptably high subscription costs. Restrictive reuse policies, proprietary technologies, lack of transparency, biases in editorial selection and review processes, exclusion of diverse voices were all identified as issues that needed to be addressed. Consequently, the full vision of Open Access seeks not just equity in access to scholarship, but also equity in contributing to it.

At SPARC, we have long used this seminal document as a guide star to construct our strategies, programs, and initiatives. We believe we must enable a global, open ecosystem where the production, communication, access, and use of research outputs and educational materials maximizes the public good. Considerations of equity and community alignment must be foundational.

Our end goal is not to retain the system we currently have simply flipped to a different business model. It is to catalyze widespread change in order to enable a full, robust system of scholarly *communication* – not just scholarly *publishing*. We are committed to enabling the inclusive, ongoing conversation of scholarship that the BOAI originally envisioned, and we look forward to working with you to make this shared vision a reality.

To that end, we are pleased to provide these comments support the Plan S coalition in realizing its goal, and to recommend specific adjustments to the implementation details that we believe will strengthen the Plan's ultimate outlook for success.

Question 1: *Is there anything unclear or are there any issues that have not been addressed by the guidance document?*

We take this question as an opportunity to address the administrative practicalities of compliance with Plan S. To that end, we would like to request that the Coalition provide clarity as to who will be directly responsible for monitoring and enforcing the implementation of Plan S. While we understand that individual funders will bear some individual responsibility for compliance, we are curious as to where the ultimate locus for ensuring harmonized, community compliance will reside. Will Coalition S evolve into an organization with a strong charter to ensure compliance? What will the role of Science Europe be in this process? Similarly, what will be the role of the European Commission? Will there be an explicit channel to minimize duplication or confusion between Plan S requirements/compliance and those of Horizon Europe open science policy requirements?

Drawing on our long experience of working on compliance with similar requirements across a diverse landscape of U.S. federal funding agencies, we are concerned that without an explicitly designated and appropriately empowered oversight entity and the deliberate harmonization of compliance mechanisms, the chances for Plan S to achieve its laudable goals will be diminished.

Similarly, we appreciate that there is a review phase built into the implementation process – slated to take place in 2023. Where does responsibility for this process reside? The development of success metrics and indicators, the establishment of benchmarks and milestones, and the early communication of these to funding recipients will be critically important – as will be transparency of the review process. We would encourage the Coalition to establish an internal body of participating funders to carry out this crucial function as openly and collaboratively as possible.

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

A goal of Plan S is to transform the publishing system; we firmly agree that this is essential. However, we are concerned that the current implementation requirements for Plan S focus too narrowly on simply maintaining current distribution channels and providers. To truly transform the system, implementation options for a broad range of platforms should be promoted. We encourage the Coalition to address this in several ways.

First, we encourage you to expand the scope of the proposed “independent study on Open Access publication costs and fees (including Article Processing Charges (APCs))...” An objective economic analysis of the potential impacts of more widespread adoption of APC's (including the possibility of introducing systemic marginalization of the ability of various communities to contribute to the scholarly conversation) should be conducted, and we fully support this.

However, we feel that it should include a robust examination of other potentially more cost-effective options – such as collective funder investment in shared, open platforms, or cooperative publishing models for scholarly societies. Each option should be analyzed with a specific emphasis on short-, medium-, and long-term mechanisms for cost-controls, along with an explicit analysis of their sustainability.

We remain deeply concerned that simply enforcing a move to “flip” to an Open Access-based version of the current publishing system will do nothing to ease (and potentially exacerbate) cost increases, as well as further institutionalize other structural inequities.

Second, we would like to see Plan S more robustly promote the development and use of a global network of open platforms – including repositories, preprint servers and funder platforms. In the U.S. and Canada in particular, the research community has been increasingly utilizing these channel as an essential part of the research communication fabric.

For example, at the U.S. National Institutes of Health (NIH), the PubMed Central ([PMC](#)) repository has long been a locus of compliance for federal public access policies for biomedical literature. Over the past six years, with the expansion of U.S. federal public access policies, the content in PMC has grown to encompass a rich collection of articles from a broad range of other funders – from the National Aeronautics and Space Administration (NASA) to National Oceanic and Atmospheric Administration (NOAA) to the Environmental Protection Agency (EPA). The repository currently hosts approximately 5.3 million articles, of which about 40% are available as fully Open Access articles. More than 1.5 million unique users access these articles each and every day, making it a central resource in the scientific community.

The U.S. higher education community is increasingly investing in tools and services to promote interoperability of repositories. The recently debut of the [Johns Hopkins University Public Access Submission System \(PASS\)](#) is an exemplar of these new breed of easy shared, community-developed compliance mechanisms. It enables automatic deposit of articles into multiple repositories, supporting public and private funders including the NIH, NASA, and the Howard Hughes Medical Institute (HHMI), as well as scholarly and professional society publishers.

We would also observe the boom in preprint services across multiple disciplines, and the rapid adoption of these platforms by individual researchers and communities. Where conventional wisdom long held that these cost-effective, community-maintained platforms were only of interest and use to a narrow community (i.e., arXiv for high-energy physics and related disciplines) the explosion in popularity of [BioRxiv](#) and [SocArXiv](#) tell a much different story. To truly support a transformation in scientific communication, Plan S should explicitly support fast, open, and flexible channels that researchers are already flocking to.

Similarly, we encourage the Coalition to actively consider the importance of the affordable, sustainable infrastructure needed to support a full range of 21st century scientific communication options. We suggest that group consider establishing an internal working group (or similar body) of

participating funders to explore the need for collective investments in community-controlled digital infrastructure and scholarly communications services.

SPARC believes that ensuring that research communication infrastructure is aligned with the aims and values of the research community is essential for establishing strong foundation for Open Science. To support this, we and our colleagues at the Confederation of Open Access Repositories (COAR) have developed seven “good practice” principles for the community to consider when thinking about provision for scholarly communication infrastructure and services. The aim of these principles is to provide a framework to ensure that services are transparent, open, and support the aims and values of the scholarly community (<http://dx.doi.org/10.6084/m9.figshare.1314859>). These principles represent a starting point for discussion, and are meant to be shared and built upon.

Thank you very much for the opportunity to contribute these comments to the feedback process. We look forward to working closely with you to help Plan S successfully achieve our shared goals.

Respectfully,

A handwritten signature in black ink, reading "Heather Joseph". The signature is written in a cursive, flowing style.

Heather Joseph
Executive Director