



ARL Feedback on Plan S Open Access Implementation Guidelines February 8, 2019

The Association of Research Libraries (ARL), the collective of research libraries in Canada and the United States, welcomes the bold vision of [Plan S](#)—a near-term world without paywalled journal literature, in which scholarly discovery is accelerated through free and open access (OA) to all published findings. ARL is committed to achieving equitable and barrier-free access to information, and therefore is in full support of the vision.

We submit the following feedback on the [Plan S implementation guidelines](#), expressing what needs to be addressed in order to advance on our shared goal.

ARL thanks the members of cOAlition S for their recognition that there are many stakeholders who share an agenda to transform the existing scholarly communication system. These groups each bring different approaches and solutions to this transformation.

In particular ARL:

- Supports the acknowledged role of **open repositories** as mechanisms for achieving immediate open access to scholarship, and endorses the February 6, 2019, [response to Plan S implementation guidelines from the Confederation of Open Access Repositories \(COAR\)](#). COAR both articulated the challenges of the open repository community in meeting the high technical requirements of Plan S as written, and offered minimum viable requirements necessary to achieve the vision of Plan S.
- Shares the cOAlition S acknowledgement of a diversity of models for OA journals, in particular non-APC-based outlets. ARL has concerns about the technical requirements in the implementation guidelines for **non-APC-based OA journals**. ARL urges cOAlition S not to classify long-term good actors in scholarly communication as non-compliant with Plan S based on their inability to meet stringent technical requirements currently out of reach for the majority of these journals. Rather, cOAlition S could consider lengthening timelines to meet requirements, and/or, as ARL member libraries [Harvard and MIT suggested in their public comments](#), provide funding for these journals to become compliant.
- Welcomes cOAlition S establishment of a “**fair and reasonable APC level**,” and encourages maximum transparency in the accounting of that level so that publishers of all sizes can fairly compete, and so that the rubric may become an accepted standard among all stakeholders. This rubric should include waivers or provisions for scholars

who are unable to pay APCs in the absence of external or institutional funding. To be successful, Plan S must ensure equitable, barrier-free access.

- Supports **author retention of copyrights** and ability to issue **open licenses**. Scalable mechanisms for asserting copyright retention remain a challenge for research institutions, and we look forward to ongoing conversation with cOAlition S to find solutions that work for the scholarly community and in support of greater openness.
- Looks forward—as a partner in the research ecosystem—to the findings of Wellcome, UK Research and Innovation, and Association of Learned and Professional Society Publishers (ALPSP) on Plan S–compliant business models for **scholarly and learned societies**. ARL commits to working with the learned society community to find a path forward for open, equitable, scholarly publishing.
- Affirms that **research libraries are critical stakeholders** within scholarly publishing, particularly within their own institutions. ARL, along with our international research library partner associations in Australia (Council of Australian University Librarians), Canada (Canadian Association of Research Libraries), Europe (Association of European Research Libraries), and the United Kingdom (Research Libraries UK), would welcome ongoing communication and engagement with cOAlition S on these implementation guidelines to ensure the success of the Plan S vision.

We look forward to continuing discussion and engagement on this important set of issues regarding journals and articles. Thank you very much for the opportunity to comment on this ambitious vision to significantly change the scholarly communication system.