

EMBL Feedback regarding Plan S

The European Molecular Biology Laboratory (EMBL) is Europe's flagship intergovernmental research organisation for the life sciences headquartered in Heidelberg, Germany, and five sites across Europe: the European Bioinformatics Institute (EMBL-EBI), Hinxton, UK, Grenoble, Hamburg, Rome and Barcelona. More than 26 Member States support EMBL to carry out its missions: to conduct state-of-the-art research, to provide services to the research communities of its Member States and to train the next generation of scientists.

Europe PMC is an open access repository of life sciences research articles, hosted by EMBL-EBI. Europe PMC supports the open access policies of 29 international research funders, and contains over 5 million full text articles and 35 million abstracts integrated with data and the wider research ecosystem, supporting open science.

1. EMBL strongly supports funders in their endeavours to increase the volume of research papers that are open access.
2. EMBL strongly believes that the outputs of its research should be made available as widely as possible and that Open Access ensures that there are no barriers to anyone in the world in finding and accessing science reported in EMBL research papers.
3. EMBL strongly supports measures that encourage hybrid journals which use double-dipping charges to “flip” to a fully open access model as in Plan S.
4. EMBL recognises that the goal of Plan S is not to tell researchers where to publish, but rather to nudge hybrid journals to move to a fully open access model.

5. EMBL itself has an Open Access policy that currently requires original research papers to be made available as soon as possible and in any event within 6 months after publication, preferably with a CC-BY license.
6. EMBL implements its OA policy via the Europe PMC archive, alongside 29 international funders of life sciences research, many of whom are Plan S signatories (Wellcome, BBSRC and MRC (UKRI), ERC, FWF and a supporting statement from SNSF). Europe PMC doubles as the Institutional Repository for EMBL.
7. Europe PMC is compliant with all the Plan S implementation guidelines, such as running a helpdesk, full text article XML workflow, machine readable license and funding statements. EMBL strongly supports inclusion of XML workflow in Plan S which will allow standardised data exchange amongst repositories
8. We see that the repository route to compliance, in which researchers can upload an accepted manuscript to a repository that can make the full text available on publication with a CC-BY license, provides the required flexibility on publishing venue until such a time when most journals operate a fully OA model. However we request that the funders recognise and build upon current best practices across disciplines, for EMBL this means the life sciences, in order to deliver Plan S to best effect.

The above points emphasise that EMBL is able and willing to meet the Plan S requirements if some considerations are taken into account. We do feel that there are some aspects of Plan S which potentially could have adverse impact on research stakeholders and hope that the following issues will be carefully considered.

1. Proposed cap on Article Processing Charges (APC). EMBL doubts whether this will be workable. EMBL would prefer that APCs were based on quality of service provided which includes manuscript refereeing and

text copyediting. One effect of a cap might be that nearly all journals would charge the maximum APC, regardless of service provided.

2. Many non-profit learned societies support their activities such as research fellowships, travel grants, training workshops and conferences through the income generated by journal subscription. EMBL is concerned about the impact of Plan S on the beneficial activities of such societies. EMBL would support a solution that protected these activities during and after the transition to open access.

3. EMBL would like to see transparency of production and publication costs as well as any other added-value operations, ideally published in easily discoverable and cross-comparable places e.g. in DOAJ.

4. Authors with minor contributions (middle authors) do not decide where to submit a manuscript. This might impact collaborations of Plan S compliant researchers with researchers working in non-Plan S compliant environments.

5. EMBL considers the move to FAIR and open data publishing as equal to, if not more important than, the move to immediate open access. It is this step that will lead to an increase in quality of published science.