

FCT feedback to the “Guidance on the Implementation of Plan S”

FCT welcomes the publication of the Guidance on the Implementation of Plan S, since it addresses a number of concerns from stakeholders of research communities not only from Portugal but from all over the world.

FCT particularly salutes:

- the clarification that cOAlition S does not favour any specific business model for Open Access publishing or advocates any particular route to Open Access, living room for new innovative publishing models;
- the explicit acknowledgement of the importance of a diversity of models and non-APC based outlets;
- the recognition of Open Access through repositories as legitimate and important and the fact that repositories play an important role on the long term preservation of scientific information and on research management;
- the acknowledgment that research needs to be assessed on its own merits rather than on the basis of the venue in which the research is published and the intention of cOAlition S members to sign DORA and implement those requirements in their policies (which is very important to remove obstacles to the adoption of open practices by researchers);
- the intention 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;
- a more flexible approach to the implementation timeline, allowing each organisation to tailor the implementation of Plan S to its particular context and a gradual transition;
- the clarification that the individual cOAlition S members are not required to enter into transformative agreements nor to fund APCs that are covered by such agreements;
- and, finally, the acknowledgment that Open Access journals and platforms must provide automatic APC waivers for authors from low-income countries and discounts for authors from middle-income countries.

Technical requirements

Some requirements have insufficient detail and may give rise to multiple interpretations.

In general, requirements seem to differ greatly in their nature and level of detail. Some have very objective determinations (e.g., DOI or CLOCKSS), while others are simply indicative.

Moreover, Open Access repositories seem to have stricter requirements than Open Access journals or platforms. For instance, no specific XML format is required for Open Access journals whereas for repositories JATS-XML is required. This will place repositories in an even more

disadvantaged position compared with commercial Open Access journals, especially if we take into account that repositories deal with limited resources and are mainly operated by the research communities themselves.

For a fair uptake of Open Access, and to provide equal opportunities for every interested player or stakeholder group to engage in Open Access initiatives, the scientific communication environment should be regarded as an ecosystem, comprised of several complementary or symbiotic systems (journals, platforms or repositories).

We believe the technical requirements for Plan S would benefit from the establishment of a regulatory framework for interoperability between the several systems, converging towards a common goal of immediate and unrestricted Open Access. We suggest COAlition S could commission this task, involving experts to help define and achieve consensus, through the establishment of use cases and respective information flows. Additionally, we propose a transition period for the full implementation of all technical requirements.

Below are a series of more specific points of the technical requirements where FCT considers more clarity could be provided.

Open Access Journals and Platforms

- Deposition of content with a long-term digital preservation or archiving programme (such as CLOCKSS).

Requirements for long-term digital preservation should also be specified.

- 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).

The machine readable formats should be specified.

- High quality article level metadata – including cited references – in standard interoperable format, under a CC0 public domain dedication. Metadata must include complete and reliable information on funding provided by COAlition S funders.

It is not entirely clear what is meant by *high quality article level metadata*. This should be defined better.

Deposition of Scholarly Content in Open Access Repositories

In general, FCT deems most of [COAR's](#) and [arXiv's](#) remarks pertinent, although FCT agrees with COAlition S's view that the automated manuscript ingest facility should count as a basic requirement.

- Full text stored in XML in JATS standard (or equivalent)

FCT also follows COAR's and arXiv's opinions that the SignPosting protocol should be recommended and be sufficient. This would allow Portuguese repositories to become Plan S compliant by the end of this year.

- Helpdesk

Again, FCT follows COAR and arXiv's position. It really depends on how this requirement is interpreted, but if what is meant is permanently available user support provided by way of an email or a contact form (i.e., not in real time), then this should be no different than what many journals currently provide.

Final comments and suggestions

FCT considers that the implementation of Plan S must at all costs avoid incurring in double standards, taking care not to impose comparatively higher requirements to repositories than to journals¹.

For Portugal, it is very important the concept that low and middle-income countries should benefit from APCs² waivers or discounts.

If cOAlition S follows the regulatory approach suggested above (general comments on the technical requirements), FCT additionally recommends that:

- the technical requirements are defined and agreed on by experts from COAR and DuraSpace (for repositories) and from OJS, Scielo, LODEL and OPERAS (for journals) with the support of experts from FREYA and GO FAIR;
- technical requirements are implemented according to a staged / phased approach comprising, for instance, two or three levels of compliance.

¹ In addition, phrasings such as “In addition, **cOAlition S will, under specified conditions, accept** deposit of scholarly articles in Open Access repositories (...)” might convey a less positive image of repositories. A formulation such as “Scholarly articles are compliant with Plan S if they are published in compliant Open Access journals or on compliant Open Access platforms, or deposited in compliant Open Access repositories under specified conditions.” would have been preferable.

² In this sense, a formulation such as “Where article processing charges (APCs) apply, cOAlition S will contribute to establishing a fair and reasonable APC level, including discounts or equitable waiver policies” would have been preferable.