Consultation on the "Plan-S" implementation guidance
Submission from the Higher Education Authority

Plan S was launched in September 2018 by a coalition of European research funding organisations (*cOAlition S*), with the support of the European Commission and the European Research Council. Its' aim is to achieve full and immediate Open Access to publications from publicly funded research from 2020 onwards. It calls for a major shift in current academic publishing models towards a system that is more accessible, efficient, fair, and transparent. This initiative is built around the ten key principles of Plan S.

cOAlition S has invited public feedback on its guidance for implementation of Plan S.

> *Q1: Is there anything unclear or are there issues that have not been addressed by the guidance document?*

> *Q2: Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access to research outputs?*

The Higher Education Authority (HEA) welcomes the opportunity to submit its' views to this consultation process and to comment on specific areas of implementation, which require further clarification.

HEA Supports Open Access

The Higher Education Authority (HEA) fully supports the goal of *Plan-S* to achieve "full and immediate Open Access (OA) to publications from publicly funded research" and agrees with the need to transform the publishing system. The HEA recognises the potential of open access and open research more broadly to make research more accessible, more inclusive, and more responsive to societal challenges.

As the statutory policy-advisory body for higher education in Ireland, the HEA supports the performance of the higher education research system through its' core grant to higher education institutions and its' policy advice to the Department of Education and Skills. The HEA's work is guided by the National Strategy for Higher Education to 2030 and Innovation 2020, Ireland's strategy for research and development. Action 4.7 of Innovation 2020 is to "*Support national and European open access policies and principles*", with specific emphasis on integrating and supporting open access repositories. Building on these strategies, Key System Objective 3 of the Higher Education System Performance Framework 2018-2020 is to support "*Excellent research, development and innovation that has relevance, growing engagement with external partners and impact for the economy and society and strengthens our standing to become an Innovation Leader in Europe*". Under this objective, higher

education institutions are required to report annually to the HEA on the percentage of publications deposited in open access repositories. The HEA is also supportive of the principles of the San Francisco Declaration on Research Assessment (DORA). The working group charged with implementing the recommendations of the HEA (2016) Review of the Allocation Model for Funding Higher Education Institutions, will take the DORA principles into consideration, as they agree the research and innovation metrics that will underpin the allocation of the 'Research Top Slice' of the core grant for higher education institutions.

The HEA works closely with other key stakeholders to create an enabling environment for research in Ireland. In 2018, the HEA was invited to coordinate an independent strategic review of the Irish Research e-Library (IReL), which is a higher education shared service that provides access to over 30,000 e-journals and resources to participating members. This review will conclude in Spring 2019 and will make recommendations about the future operating model for IReL, and the inclusion of Open Access as a key part of IReL's future strategy.

The HEA also co-chairs the National Open Research Forum (NORF), together with the Health Research Board, and secretariat is provided by the Department of Business, Enterprise and Innovation (DBEI). NORF has been established to deliver an Irish agenda for open research. NORF comprises representatives of policy, research funding, research performing, library sector and other key stakeholders in the research system across Ireland. NORF has prepared a draft *National Statement on Transitioning to an Open Research Environment*, which was subject to public consultation in November 2018, and convened a national meeting on Plan S, together with the Royal Irish Academy in January 2019, to inform a submission to this consultation process. The HEA endorses the submission made by the NORF and the points contained therein, as per the following:

Open Access Repositories

The importance of Open Access Repositories (OARs) as a proven and cost-efficient route to Open Access is inadequately reflected in *Plan-S*. The requirements for OARs are overly prescriptive and will create unnecessary barriers towards delivering *Plan-S* via the green OA route. Relevant points include:

- The requirement for XML/JATS deposit in the green Open Access route is extremely resource intensive and would, in practice, be prohibitive for many existing repositories. Furthermore, it represents an additional requirement on repositories which is not required of Open Access Journals or Platforms under section 9 of the Guidelines. We strongly suggest that this point be made as a recommendation rather than as a hard requirement for repositories. At a minimum, the rationale and benefits of recommending XML/JATS should be clearly articulated and justified by cOAlition S and should apply equally to repositories and other compliant platforms.

- The requirement for a helpdesk should be replaced by a requirement for adequate help or support services for repository users.

- It would be helpful to enhance clarity on the distinction between repositories and alternative publishing platforms.

Ireland has a well-developed OAR network. Some relaxation of *Plan-S* requirements will enable Irish researchers to maximise use and value from investment in existing OAR infrastructure. An unintended consequence of *Plan-S* may be that long-established repositories may not meet its' requirements.

Protecting from unintended consequences

Plan-S has a significant focus on changing the existing behaviours of major profitable publishers. Implementation of *Plan-S* should respect and support smaller players who serve the current system well and seek to avoid adversely impacting certain disciplines. There is a need to protect poorly-funded researchers and disciplines and Early Career Researchers (ECRs) during the transition stage. There is also a need to support Open Access publishers who do not charge publishing processing charges. Engagement with publishers to eliminate embargoes and facilitate immediate Open Access via the green route, is an area where cOAlitionS may play a valuable role. Otherwise, there is a risk that the focus on APCs may simply encourage publishers to extend embargo periods and thereby work against researchers using the green route to achieve Open Access.

The diversity of circumstances, norms and practices across disciplines should be acknowledged and respected. It has been argued that the views, circumstances and practices of researchers from Arts and Humanities disciplines have not been sufficiently incorporated into *Plan S* to date – a strong message from our national discussions is that these disciplines should not become "collateral damage" of *Plan-S*. We welcome the extended timeline beyond 1 January 2020 to achieve Open Access for monographs and books in this regard.

Learned societies who rely on publishing revenues to support their other activities may face particular challenges and will need support to develop alternative revenue streams. We welcome the approach by Wellcome, UKRI and the ALPSP to fund a study to explore "how learned societies can adapt and thrive in a *Plan-S* world".

One solution proposed during our national discussion was to initially focus efforts on publishers whose turnover is above a given euro threshold, enabling an extended transitional period for smaller publishers. This solution would mirror the practices of government bodies such as the Revenue Commissioners when introducing new requirements.

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Changing research assessment culture

The HEA welcomes the fact that signatories of *Plan-S* will sign the DORA statement and implement its' principles. We support the move away from journal-based metrics (impact factor, citation rates) towards a culture where importance is placed on the intrinsic value of research. The move from publishing in hybrid journals, which are the dominant model for some communities, will require a parallel change in culture, recruitment and promotion practices, reward and incentive schemes and research evaluation procedures involving the entire research eco-system. These changes should happen at an international level.

Researchers, especially ECRs, have legitimate concerns that their ability to obtain research grants and academic promotions and their international mobility, may be harmed if they are prevented from publishing in prestigious, non-compliant journals. Broad and full implementation of *Plan-S* is needed to develop a level playing field and particular consideration of ECRs is warranted.

Licensing and copyright

Plan-S licensing requirements are viewed as overly restrictive. We agree that publication licences should by default be Creative Commons (CC) Attribution (BY), to maximise benefits of research for society via the right to re-use, modify, and re-distribute. However, our consultation shows a need to use other licences in some instances, particularly in support of ECRs, of unfunded researchers and of researchers in arts, humanities and social sciences. A genuine requirement to apply CC-BY-ND or CC-BY-NC licences in certain circumstances should not become a barrier to enabling Open Access or to its recognition under *Plan-S*. Instead, researchers' choice of the optimal licence for their work can be supported by standardised open research skills training in this area, by guidance at the local level, and by offering researchers a range of acceptable options with CC-BY as the default. The HEA supports the practice that copyright on publications should stay with the original copyright holder (typically the author and/or institution) and not be transferred to publishers.

Costs and Alternative Models

Plan-S commits to making the necessary funding available to enable researchers to publish their work under Open Access without undue financial burden. To fully judge the financial impact of *Plan-S*, further details will be required about proposed caps on Article Processing Charges (APCs). The planned independent study on Open Access publication costs and fees will help to inform this discussion.

Careful consideration of how to support publications arising from research that is not directly attributable to a funded award, is required. Analysis of publication patterns in Ireland suggests that this is a sizeable portion of our national research portfolio. One possibility proposed is to establish a national pooled fund to finance all peer-reviewed publications,

including publications arising after the term of a funding award. This would protect from any situation where the research funding and/or performing organisations experience static or declining budgets.

Plan-S acknowledges the diversity of business and publishing models. However, within the implementation guidelines further consideration should be given to how alternative models beyond those dependent on article processing charges (APCs) could be supported. This may be particularly pertinent in specific disciplines where much work is conducted on a non-project-funded basis. Quality of peer review and evaluation processes must be maintained to prevent predatory practices.

Support/ training/ discussion with researchers

Cultural change on such a large scale will demand a 'whole of system' approach. While the success of *Plan-S* will require detailed research policies underpinned by funding, it will ultimately depend on the participation of the researchers themselves in implementing change. *Plan S* warrants more wide-ranging discussion, engagement and training with the broader research community, beyond Funders. Topics such as open licences, simplified methods of compliance with Open Access mandates and alternative Open Access models need wider input.

Stronger position

In some instances, *Plan-S* could provide a faster impetus for change, by strengthening its message. In particular, we suggest that the following items from section 9.3 become mandatory requirements for compliant Open Access Journals and Platforms: 1) Support for PIDs for authors (such as ORCID), funders, funding programmes and grants, institutions, and so on; 2) Openly accessible data on citations according to the standards by the Initiative for Open Citations I4OC."

For further clarification

Further clarity would be useful on various points: the exact nature of 'transformative agreements' with publishers, and the intentions of *Plan-S* regarding monitoring arrangements and any sanctions, with the knowledge that these will need to be implemented locally.

Other mechanisms to consider

The following are suggested as ways to further progress Open Access goals:

- o A communications strategy for the wider research community to prepare for changes;

- o Details of how *Plan-S* will support Open Access publishers who do not use article processing charges;

- o Details of plans under cOAilition S commitments to support and fund Open Access (APCs, alternative models and underpinning infrastructures for Open Access);

- o Details of how DORA principles will be implemented to drive culture change in research assessment, particularly for ECRs;

- o Details of how *Plan-S* will work to enhance the trustworthiness of scholarly communication in an open research eco-system.

Finally

Plan-S has already enriched our national discussions on how to achieve full and immediate Open Access for our publicly funded research. We look forward to working with cOAlition S to deliver this agenda.

8th February, 2019.
ENDS