Feedback on the guidance on the Implementation of Plan S by
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We have a few overall recommendations:
- **Improve on the why**: make it more clear that Plan S is part of a broader transition towards open science and not only to make papers available and OA cheaper. It is part of changes to make science more efficient, reliable and reusable.
- Plan S brings great potential, and with that also comes great responsibility for cOAlition S funders. From the start, plan S has been criticized for its perceived focus (in intent and/or expected effects) on APC-based OA publishing. In our reading, both the principles and the implementation guidance recognize for all forms of full OA publishing, including diamond OA and new forms of publishing like overlay journals. However, it will depend to no small extent on the **actual recognition and support of non-APC based gold OA models by cOAlitionS funders** whether plan S will indeed encourage such bibliodiversity and accompanying equity in publishing opportunities. Examples of initiatives to consider in this regard are OJS journal systems by PKP, COKO open source technology based initiatives, Open Library of Humanities, Scoap[3], Free Journal Network, and also Scielo and Redalyc in Latin America.
- The issue of evaluation and assessment is tied closely to the effects Plan S can or will have. It is up to cOAlitionS funders to take actionable steps to turn their commitment to **fundamentally revise the incentive and reward system of science** in line with DORA into practice, at the same time they are putting the Plan S principles into practice. The two can mutually support each other, as open access journals that also implement other open science criteria such as pre-registration, requirements for FAIR data and selection based on rigorous methodological criteria will facilitate evaluation based on research quality.
- Make sure to (also) provide Plan S in the form of **one integrated document** containing the why, the what and the how on one document. Currently it is too easy to overlook the why. That document should be openly licensed and shared in a reliable archive.
- In the implementation document include a (graphical) **timeline** of changes and deadlines.

Looking at your first question for feedback (Is there anything unclear or are there any issues that have not been addressed by the guidance document?) we would like to bring a number of issues to your attention.

Feedback on article 2:
- There is uncertainty over acceptance of overlay journals and generally journal external peer review systems. The implementation document lists as a basic requirement for journals and platforms that they are registered in DOAJ or applying for registration with

DOAJ. The problem is that we are not sure whether DOAJ will list/accept non-journals peer review platforms or overlay journals. They do list SciPost physics, but Scipost considers itself a full fledged publication platform. We understand that it is the cOAlition's intention to support this route, but as it is in some ways unchartered territory, it would be wise to specifically **indicate how quality certification is done for non-journal venues**

Feedback on article 8:
- Acknowledging the resulting limits on potential (re)use, consider including an opt-out of the license requirements **by accepting CC-BY-ND when requested,** in order to increase support of humanities.

Feedback on article 9:
- Acceptance of separation of publishing and peer review in 2 locations/systems.
  The implementation guidance text potentially casts some doubts about the eligibility of overlay journals when the publication (including any revisions following peer review) resides on e.g. a preprint server or repository, rather than being published on the overlay journal platform. In these cases, only the peer review is taken on by the overlay journal, and the article would of course be listed as being included in the overlay journal. In terms of the four traditional functions of publishing, the overlay journal would serve the functions of certification and dissemination, but not those of registration and archiving. Open Access platforms referred to in this section are publishing platforms for the original publication of research output (for example scholarly articles and conference proceedings). Platforms that merely serve to aggregate or re-publish content that has already been published elsewhere are not included. In this regard, it is also interesting to note that Jean-Sebastian Caux commented on our earlier version of the then-eight routes that he does not consider SciPost an overlay journal in that sense of the word, because SciPost does publish articles on its own platform (https://101innovations.wordpress.com/2018/10/22/eight-routes-towards-plan-s-compliance/#comment-203). A possible way to elucidate the intent of cOAlition S in this regard might be to **explicitly mention (perhaps added to the paragraph quoted above) that overlay journals taking on peer review and publishing the resulting articles are compliant**, even when the articles themselves do not reside on the platform of the overlay journal. But this is indeed relatively uncharted territory.

Feedback on articles 9 and 10:
- The are quite some (technical) requirements for journals and repositories. We would like to see cOAlition S to **commit to support the implementation of those requirements** by smaller (esp. non-APC-based) journals and repositories. This can be done by (financially) supporting technical solutions and co-organize training, materials (e.g. video) and meetings to help implementation.
- The requirements for journals do not seem to apply to hybrid journals in transformative agreements. This creates the strange situation that a lot of hybrid journals will be held to much lower standards than full OA journals, platforms and repositories and do not have

to invest until (in some cases, depending on agreement timing) 2025. To redress this to some extent, we would like to advise **relaxation of the technical and other requirements mentioned in article 9.2 and 10.2 (XML, JATS (or equivalent), API, CC0 metadata incl. references, and transparent cost/prices) for instance until 2021** (instead of 2020).

Feedback on article 11:
- It says now "COAlition S acknowledges existing transformative agreements. However, from 2020 onward, new agreements need to fulfil the following conditions to achieve compliance with Plan S". There is a chance that by pre-2020 signing of long term contracts hybrid could remain compliant even after 2024. To avoid that we would change the wording to **include a maximum running period length for existing (pre-2020) contracts to be acknowledged**. E.g. change this into "COAlition S acknowledges existing transformative agreements with contract periods that do not go beyond 2022".
- We also recommend replacing 'existing transformative agreements' with 'existing off-setting, read-and-publish and publish-and-read agreements' to **prevent confusion as to what is meant by 'transformative agreements'**.
- It says now "The negotiated agreements need to include a scenario that describes how the publication venues will be converted to full Open Access after the contract expires." To **avoid leaving room for multiple interpretations of the flipping deadline** we would change the phrasing in such a way that it is beyond any doubt what is meant exactly. (E.g. "at the moment the contract expires", or "within a year after the contract expires".)