

To cOAlition S,

after careful reading of the implementation guidelines on Plan S we welcome it as a bold move towards change in increasingly untenable situation of academic publishing. In particular, we praise the call for more transparency in publishing costs. However, the current state of Plan S takes unnecessarily restrictive approach to open access (OA) itself, which may influence funders' willingness to join, publishers possibilities to make the transition on such large scope and quick notice and, most importantly, researchers' publication opportunities.

**Plan S generally interprets OA in very narrow terms. It imposes unnecessary restrictions for compliance while not opening any new ways to OA. In practice, it labels a significant portion of currently freely available, fully OA articles as being published in a non-compliant way**, just because they do not conform to arbitrary requirements put on repositories and journals. Instead of restricting, **Plan S should aim to expand the possibilities of OA** by emphasizing support for the much more cost-effective green OA model, enable journal transition process over longer periods of time and allow Hybrid OA to evolve naturally into full, preferably Diamond OA, through incentives and agreements. Gold OA should also be de-emphasized as potentially costly solution that also links academic and publishers' financial interests.

We, the signatories below, give our support for the following suggestions to improve Plan S

### 1. Repositories

The currently proposed requirements on repositories render many smaller, e.g., institutional ones unable to comply due to technical, personal and/or financial limitations. **We suggest loosening the following technical restrictions on repositories**

1. Automated manuscript ingest facility – change from *required* to *recommended*
2. Open API to allow others (including machines) to access the content – change from *required* to *recommended*
3. Full text stored in XML in JATS standard (or equivalent) - change from *required* to *recommended*
4. QA process to integrate full text with core abstract and indexing services (for example PubMed) - replace this with *full OpenAIRE compliance*

These changes are aligned with the recommendations by The Confederation of Open Access Repositories (COAR)<sup>[1]</sup>, and will allow to use vast pool of existing local repositories to achieve green OA in a cost-effective way. The OpenAIRE compliance will make all repositories searchable from central location while enabling the use of existing infrastructures, without need for establishing new ones at additional cost.

### 2. Green Open Access

No-embargo on manuscripts together with CC-BY license and authors' retention of copyright are not feasible options for Green OA for many publishers. We propose allowing a short embargo period of 6-12 months on Green OA, similarly to the current system in USA and in line with current ERC requirements. Many journals would already meet the 12-months criterion as of today. Consider developing new models where embargoes on accessibility of Author's Accepted Manuscripts through repositories are removed or shortened via charge to the publisher, which would be considerably less than full article processing charge (APC) in the corresponding journal (for example, about 20%-50%). This would provide identical scientific content via Green OA in more cost-effective way than APC-based Gold OA, and make increasing pickup of Green OA sustainable for all parties.

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[1] <https://www.coar-repositories.org/files/COAR-response-to-implementation-of-Plan-S-1.pdf>

**3. Offsetting and transformational agreements**

We welcome the introduction of transformative agreements for hybrid journals for the transitional period. However, we believe that transitions to OA should happen naturally as a result of large portion of the journal being already OA through other means. To this end we propose to allow different types of agreements for hybrid journals, such as VSNU agreements in Netherlands, recent agreement between Projekt DEAL and Wiley in Germany, or similar “Read&Publish”-type of solutions for hybrid journals. Active support should be provided for cOAlition S members to work in a coordinated manner with societies in order to transform their journals into transparent free-to-publish & free-to-read Diamond OA. Support of Read&Publish agreements is a natural path towards this.

**4. Timeline and transitional period**

We suggest allowing a longer period of time for the transition and letting the flip to OA be a natural change when journal gradually reaches certain threshold of OA papers, e.g., 65%, achieved through support of hybrid OA and Read&Publish agreements. Arbitrary dates will not make publishers change their model in situation where the market does not support the transition. It should be noted that current members of cOAlition S represent only a few percent of the world's research funding, and thus have very weak position to influence the publishing industry on their own, without willing cooperation from publishers.

**5. Gold OA**

De-emphasize role of Gold OA in favor of far more preferable Green and Diamond OA routes. Gold OA is currently given disproportionately large amount of space in Plan S compared to other models. Moreover, Gold OA model promotes coupling of academic and financial interests and is thus ethically more challenging to uphold and gives opportunities for proliferation of predatory journals. Large support of this model comes with risks of increasing costs and compromising the scientific quality.

**6. Licenses**

Consider allowing other Creative Commons licenses as well. CC-BY provides possibility for third parties to commercially exploit publicly funded research without control from researchers. Moreover, since the primary need of researchers and public is to be able to read the publications and interpret reported findings, there is very little need to reproduce, adapt or modify the text, figures and other content of the article itself, that would justify necessity for CC-BY license. Thus, Non-Commercial and No-Derivatives options would all fulfill the criteria of free dissemination of the results in both scientific community as well as towards public.

Researchers from University of Oulu

original list of 129 signatories has been  
sent to Academy of Finland