

Maynooth University Research Committee

Response to Guidance on the Implementation of Plan S

February 2018

Summary: The Maynooth University (MU) Research Committee cautiously welcomes the ambition of Plan to make publicly funded research fully and immediately Open Access (OA). However, for this ambition to be realised it will be important that key issues around resourcing and the international context of research and scholarly communications are addressed in the implementation plan to underpin a successful transition to OA. Failure to do so risks unnecessarily damaging the global research enterprise. Moreover, to achieve maximum buy-in from the research community, Plan S needs to take into account the full range of publishing financing models, which vary according to discipline. This response suggests that a more focussed approach is likely to ensure that this transition is fastest where it is most needed and will be most impactful.

1. Background

In September 2018 a group of national research funding organisations, with the support of the European Commission and the European Research Council (ERC), announced the launch of cOAlition S, an initiative to make full and immediate Open Access to research publications a reality. It is built around Plan S, which consists of one target and 10 principles. In late November 2018 cOAlition S released the implementation guidance for Plan S and sought public feedback by 8th February 2019. This note sets out the response of the MU Research Committee on behalf of Maynooth University. MU is an internationally recognised institution located 25 kilometres outside of Dublin, Ireland, and is Ireland's fastest growing university. With more than 12,000 students from more than 90 countries, Maynooth offers a range of programmes at undergraduate, Master's and PhD level in the humanities, science and engineering, and social sciences, including business, law, and education. The University also offers a range of international programmes and partnerships. In addition to being named in THE's Top 100 Under 50, Maynooth University is recognised among the top 400 universities in the world, the top 200 European universities, and as one of the top 200 universities for international connections and outlook.

2. Is there anything unclear or are there any issues that have not been addressed by the guidance document?

2.1 Aim and Scope

- i. In plotting the transition to OA the implementation plan must recognise the international context of research and scholarly communications. Researchers and research partners work with Irish and other researchers and institutions in the hope of generating research that can be published in respected journals and that these outputs can be subsequently used to advance their research and their careers. If from 2020 onwards they will be unable to publish in such outlets while working with/for Plan S signatory funded projects, it may make such projects less attractive. The level of the risk will be dependent on the scale and pace of change elsewhere and will be heightened if there are only a small number of early adopters of the Plan. Research funded by cOAlition S is just a small fraction of the entire research output. In Ireland for example, Science

Foundation Ireland (a cOAlition S member) funded approximately 9% of research outputs last year (from WoS). Only 45% of the SFI funded publications were Open Access. If there is to be a move to wide scale Open Access publishing there would need to be more funders on board and support or incentives given to 'unfunded' researchers to publish in Open Access channels. Similarly, the Plan may inhibit signatories' ability to attract international talent to their projects if there have not been similar changes internationally. To address the above, the aim and scope section needs to be stronger and well-considered on how this vital link to research careers/assessment will be addressed.

2.2 Plan S Compliance

The implementation guidance does not include anything new in terms of monitoring and subsequently ensuring compliance, either on a technical or policy basis. This has been a significant challenge in past OA mandates that has yet to be overcome. Plan S compliance makes significant demands for investment in infrastructure and overheads by Open Access providers without any guarantee of a successful return on that investment, i.e. papers actually being made Open Access. A technical plan and supporting policy is a necessity for fostering and encouraging full, immediate Open Access. An unenforceable policy, or one that is not adequately resourced, with careful consideration of the necessary infrastructure, will not result in accelerated change.

2.3 Publication Costs

- ii. The guidance document states that "cOAlition S members will ensure financial support for OA publishing via the prescribed routes to compliance." This is too vague - cOAlition S signatories should fund article processing charges (APCs) in a manner agreed with stakeholders and this should be clearly stated in the plan. Publication costs should be allocated a budget line in grant funding.
- iii. There is a risk that Plan S will encourage publishers (including those of prestigious journals) to raise APCs when they realise that a large volume of the research outputs must now be Open Access. Thus, the comments in the implementation plan about establishing "fair and reasonable" APCs is vital but there are clear challenges around implementing it and some have raised doubts about the legality of such a move¹. It is not clear how inflation of these or the cost of transformative agreements will be controlled over time.
- iv. Transparency is an important element. In recent years, it has been a challenge for libraries and research institutions to adequately fund serials budgets as they increased beyond sustainable levels. Transformative agreements must control costs, and details of cost and the terms of agreements should be publicly available.
- v. The implementation plan refers to the need for further study of APCs, and some such studies have begun to emerge independently. These are often limited to determining 'normal' APC charges. Any study commissioned by cOAlition-S should identify what APCs are used for by the publishers as a further dimension of the expected transparency.
- vi. For transformative agreements to comply with Plan S, negotiations need to be concluded before the end of 2021, and therefore collaboration and a united approach to future negotiating are essential from all consortia, libraries, research performing institutions and

¹ https://www.ria.ie/sites/default/files/allea_response_to_plan_s_1.pdf pg 4

funders. This will require coordination and communication across Ireland and Europe. This is also important in light of the need for a coordinated approach with regard to concomitant changes to academic assessment and career progression highlighted earlier.

2.4 Timeline

- vii. The timeline proposed by the guidance implementation does not offer clear guidelines for stakeholders “cOAlition S appreciates that the timeline for implementation of Plan S will vary among member organisations. Implementation of Plan S will take place from 1 January 2020, having impact on either 1) existing grants, 2) new projects/grants or, at the latest, 3) new calls. cOAlition S members should, at the very least, implement the new requirements in all calls issued after 1 January 2020. In 2023, cOAlition S will initiate a formal review process that examines the effects of Plan S.” This timeline does not take into account consultation and communication plans with researchers, libraries negotiating with publishers, design of transformative agreements, registration of journals with the Directory of Open Access Journals (DOAJ), transitioning work flows, new technical developments being deployed etc. Moreover, the kind of culture change required under 2.1 above is likely to take longer than 2 -3 years. The implementation plan need to strike a balance between laudable goals and the risk of losing credibility due to impractical/unrealistic timelines.
- viii. Libraries and library consortia all over Europe negotiate deals with publishers which are generally multiannual in duration to achieve best deals and this will be the case during the transition period to transformative deals. Many of these big deals already in place will run over the 2020 starting point of Plan S.

2.5 Licensing and Rights

- ix. Plan S has a strong focus on publication practices common in the Science, Technology, Engineering and Medical areas. It does not account fully for other disciplines. Additionally, by advocating publishing in non-hybrid journals, it is not clear yet how researchers might fulfil expectations from their home institutions which may be to publish in high ranking journals (which are generally hybrid) and requirements from their funders to publish in Open Access journals. This is particular pointed when one considers multi-institutional collaborations.
- x. The document explains that authors will have to publish under a CC BY 4.0 or a CC BY-SA 4.0 licence. This is a contentious area with many commentators regarding this as overly restrictive, particularly researchers in the Humanities and Social Sciences, where publications can often be creative or artistic in nature.

2.6 Deposition of Scholarly Content in OA Repositories

- xi. Several of the listed requirements for Open Access repositories would be either too expensive or technically impossible for institutional repositories to comply with e.g. automated ingest facility, full text stored in XML in JATS standard, deposition of content with a long-term archiving programme such as C/LOCKSS, inclusion of cited references in metadata. These repositories are far less well-resourced than commercial publishers yet Plan S states that repositories must apply 'the same quality criteria as Open Access journals and platforms'. Plan S effectively prices institutional OA repositories out of the market, despite them being more impactful than publishing in hybrid journals.

3. Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?

- xii. With regard to the need for the vital link to **academic/research careers**, cOAlition S should consider how to encourage changes in research/researcher assessment consistent with a drive for OA, while supporting excellence. Further consideration of this crucial area will also need to be factored into the timelines envisaged.
- xiii. A technical plan and supporting policy and resources to underpin **compliance** is a necessity for fostering and encouraging full, immediate Open Access. Practical suggestions from other commentators e.g. the required use of ORCIDS would be helpful in this regard.
- xiv. cOAlition S members should look to institutions, organisations and countries who have developed and adopted successful **Open Access monitoring programmes**.
- xv. Plan S should allow the author to select an appropriate **open licence** from a broader set of acceptable options.
- xvi. In many of the feedback sessions organised as part of the consultation process the concerns of small/micro publishers have been raised. On the basis that the most benefit will be derived from making progress with the larger publishers cOAlition S might consider an **exemption/derogation for publishers with turnover under a certain level** for an extended period of time to allow for the initial focus to be on the larger publishers.
- xvii. With regard to the current requirements for **repositories**, identified above as unduly restrictive, the amendments proposed by MIT/Harvard libraries are helpful <https://libraries.mit.edu/news/harvard-library/29052/>

4. Conclusion

The MU Research Committee welcomes the opportunity to respond to the Plan S implementation guidance. We commend the ambition Plan S sets out and we look forward to a well-considered implementation plan addressing the issues identified above.