



Public Feedback on the Guidance on the Implementation of Plan S

Comments from the Royal College of Obstetricians and Gynaecologists

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

Among the areas in the guidance document that require clarification, we wish to highlight the following:

- We ask for clarity on what features ‘transformative agreements’ have to have to be considered compliant.
- Further information is needed about what the implementation date of 1 January 2020 will mean, particularly with reference to ‘transformative agreements’, which we understand can be negotiated and finalised before the end of 2021.
- We request details of how the requirement for APC waivers will be implemented and whether these waivers will be considered when looking to standardise fees.

2. Are there other mechanisms/requirements funders should consider to foster full and immediate OA of research outputs?

- We call for further discussion about the role that preprints can have. They serve the function of making research results freely available and reusable.

3. General feedback

The overall aim of Plan S is one that we fully support: we are committed to finding a way to enable dissemination, sharing, and use of the latest findings in obstetrics and gynaecology with the ultimate goal of improving the health of women. We were pleased to learn that some cOAlition S members are exploring how to help societies thrive under Plan S. The current guidance outlines a ‘one size fits all’ model that may not be applicable to organisations such as ours.

Nevertheless, we are concerned about the timescale of Plan S. It provides little opportunity to make changes to business models and working ecosystems by way of adaptation, particularly given that many of the practicalities are still unknown at this point. We therefore ask cOAlition S to engage with all stakeholders to develop a realistic and flexible revised timeline.