



## Statement on Plan S guidelines

Göttingen, February 7, 2019

*The German Initiative for Networked Information (DINI) appreciate  
lishing system that provides full and immediate Open Access for publicly funded research. DINI wel-  
comes the opportunity to provide feedback and would like to comment on the compliance require-  
ments in view of its member institutions.*

The development of modern information and communication technologies causes a change in the information infrastructures of higher education institutions and other research institutions. This change is a major topic within higher education in Germany, and more than ever requires agreements, cooperation, recommendations, and standards. The Deutsche Initiative für Netzwerkinformation (DINI, German Initiative for Network Information) supports this development. DINI was founded to advance the improvement of the information and communication services and the necessary development of the information infrastructures at the universities as well as on regional and national levels. Agreements and the distribution of tasks among the infrastructure institutions and facilities can significantly extend the range of information technology and services. This requires the joint development of standards and recommendations.

DINI very much welcomes some clarifications in the guidance document compared to the initial Plan S. This includes:

Now giving more importance to repositories and notes the value in them:

*"cOAlition S recommends that all publications and also other research outputs are deposited in open repositories and request that publishers facilitate deposit. Deposit of research outputs in open repositories is recommended to ensure long-term archiving, research management, and to support maximum re-use."*

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**Anschrift**

Deutsche Initiative für  
Netzwerkinformation e.V.  
c/o Niedersächsische Staats-  
und Universitätsbibliothek Göttingen  
Platz der Göttinger Sieben 1  
37073 Göttingen  
(T)+49 551 39-33857  
gs@dini.de  
www.dini.de

Amtsgericht Göttingen VR 2673  
**Vorstandsvorsitzender**  
Dr. Helge Steenweg  
**Stv. Vorsitzender**  
Boguslaw Malys

**Bankverbindung**  
Sparkasse Göttingen  
**BLZ:** 260 500 01  
**Konto:** 122556  
**IBAN:** DE72 2605 0001  
0000 1225 56  
**BIC:** NOLADE21GOE

Die Deutsche Initiative für Netzwerkinformation e. V. ist lt. Bescheid des Finanzamts Göttingen vom 18. Mai 2016 als gemeinnützig anerkannt, weil sie ausschließlich und unmittelbar steuerbegünstigten gemeinnützigen Zwecken im Sinne der §§ 51 ff. AO dient.

While this is a welcome declaration, some of the current requirements for compliant 'green' routes (e.g., high-quality metadata, XML tagged to the JATS DTD, etc.) seem likely to severely limit the number of compliant repository options and increase costs for alternative platforms. We would like to stress the importance of repositories as complementary mechanisms for advancing innovation in research communications, as outlined in the COAR Feedback as of December 13, 2018 [1] and ensure that their role is adequately reflected in Plan S.

Now addressing a wide range of scholarly outputs, and not just journal articles:

*"Plan S applies to all scholarly output that is reviewed according to accepted standards within relevant disciplines and is based on results from research funded fully or partially by cOAlition S members."*

Now endorsing a wider range of publishing business models – not just APCs – and innovative publishing initiatives:

*"cOAlition S does not favour any specific business model for Open Access publishing or advocate any particular route to Open Access given that there should be room for new innovative publishing models."*

Now setting clear limits to the life of hybrid OA:

*"Authors publish Open Access with a CC BY license in a subscription journal that is covered by a transformative agreement that has a clear and time-specified commitment to a full Open Access transition."*

Addressing concerns about mirror journals:

*"The journal must not have a mirror/sister subscription journal with substantial overlap in editorial board to avoid business models charging for both access and publication."*

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