

Response to Guidance on the Implementation of Plan S

RCSI & Open Access

RCSI is an active member of Ireland's National Open Research Forum (NORF) and a contributor to their *National Statement on the Transition to an Open Research Environment*¹. We were members of the forerunner of NORF, the National Open Access Committee, from its inception and signatories to *National Open Access Principles*². As an exclusively health sciences focussed research and education institution RCSI recognises how open access to biomedical research outputs can lead to better health and fully supports open access as a scholarly value.

General

- We welcome and broadly endorse the intent of Plan S to speed up the transition to make full and immediate open access to publications from publicly funded research and welcome the commitment to establish incentives for establishing OA journals/platforms or flipping existing journals to OA.
- We fully support the statement "that research funders, institutions, researchers, learned societies, librarians, and publishers must work together towards a system of scholarly publishing that is more accessible, efficient, fair, and transparent."
- We recognise the success of Plan S to date in capturing the attention of stakeholders and precipitating robust debates about the future of open access and scholarly publishing.
- We fully support the idea of retention of copyright by authors.

However we consider:

- The context for Plan S implementation should be set within the broader Open Science framework to acknowledge the cultural and behavioural changes necessary to attain open access.
- Wider adoption from international signatories is desirable to effect significant change on a large enough scale.
- Conversations with institutions at the Chancellor/CEO level are essential. Institutions have reputation and rankings imperatives which researchers are required to support, most often by publishing in high impact journals, and which some Plan S requirements may conflict with.
- That while Plan S is a first step, further dialogue and consultation between the signatories and other research funders who may not sign up to Plan S, institutions, researchers, learned societies, librarians, and publishers is essential. It is highly desirable that Plan S implementation take cognisance of any existing national policy initiatives and activities to avoid fragmentation, confusion and potential disengagement.
- The costs of open access should be carefully considered and supported by funders so that the burden does not fall on authors or institutions and ultimately restricts publication.

¹ <http://norf-ireland.net/wp-content/uploads/2018/12/Draft-National-Principles131218.pdf>

² <https://epubs.rcsi.ie/npoa.pdf>

RCSI responses to the two questions asked:

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

- a) **The transition period and how long this will be:** three years is too short a time period for other forms of publishing to emerge and become established as viable alternatives. The administrative infrastructure for compliance, as described in the implementation guidance, will take time to evolve and operationalise among all stakeholders, particularly with publishing decisions being driven by citation metrics which take time to reflect changes. Further, with 80-85% of journals currently hybrid a wholesale flip in three years is unlikely.
- b) **Support for new forms of publishing such as open access journals and platforms:** further detail on how and when Coalition S members will “collectively establish incentives for establishing OA journals/platforms or flipping existing journals to open access” is desirable. Until this is clear the incentive to establish or flip isn’t there. We consider “incentives” will include funding and where and how this funding will be made available should be clear.
- c) **The detail on transformative agreements:** it is not clear what transformative agreements are acceptable/compliant, how and who will determine that an agreement is compliant, where details should be listed etc. The consequences in particular for specialities with limited journal choice if there is no transformative agreement need to be thought through.
- d) **Article processing charges (APCs) and the cap:** details need to be established for APCs as these could have considerable impact. What will the cap be and for how long? Will this introduce unintended consequences such as journals charging APCs where they may not currently charge them? Or journals increasing APCs knowing that to be compliant, researchers will have to pay them? Will APCs become the new Journal Impact Factor (JIF), i.e., will higher APCs become a proxy for quality and possibly result in increased costs? A significant issue is that the costs of APCs are discriminatory against smaller research groups or where budgets are limited. For instance many clinicians are doing research on minimal grant funding if any.
- e) **Embargoes:** consideration of the potential impact of no embargoes on open access publishing habits should be made. The impact on current green and gold models could be significant and have unintended consequences such as increased costs.
- f) **Licenses:** the requirement for specific open licenses as outlined in Plan S requires further clarification and justification. We would favour a more open choice of Creative Commons (CC) licence by the author and/or their organisation and suggest directing authors to information to help with that choice e.g. to <https://creativecommons.org/choose/>.
- g) **Compliance and monitoring:** Plan S should expand on the implementation guidance to provide clarity on compliance and monitoring. As with open access generally the costs of compliance and monitoring should be carefully considered and supported by funders so that the burden does not fall on institutions. Compliance with open access mandates is already low and without clarity and financial support institutions are unlikely to be able, or willing, to invest the time, effort and resources in systems and processes to enable monitoring and compliance. Maybe consider a more default solution such as deposit in an Open DOAR registered repository (maybe with an embargo) even if in an OA journal too.
- h) **Impact on Careers:** The effect of the mandatory nature of Plan S on researchers at all stages of their career is something that has not been addressed in the guidance. Without a broader context and buy in for changes in career rewards and recognition (as in the broader Open Science framework) research

practice and reward systems are unlikely to change to the extent Plan S intends. This is particularly relevant for early career researchers trying to build reputations.

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

- a. Promote green open access as an option and make it easier by changing the technical specifications for repositories from required to recommended, specifically change these specifications from required to recommended as outlined by the Confederation of Open Access Repositories (COAR)³ and the libraries of Harvard and MIT⁴:
 - a. Automated ingest facility
 - b. Open API
 - c. QA process to integrate full text with core abstract and indexing services
 - d. XML format in JATs standard
- b. Provide funding for APCs as a budget line in grant funding or find an alternative means of funding institutions to pay APCs to remove the institutional concern about the financial burden and disadvantaging those institutions and authors who simply cannot afford APCs.
- c. Require ORCIDs instead of recommending them as a means to improving the efficiency and effectiveness of international digital infrastructure and author recognition.
- d. Provide infrastructural funding for institutional repositories and library supports as integral components of open access.
- e. Consider how to fund no-fee open access journals as a disincentive to introducing APCs.
- f. Permit researchers and their organisations to determine the appropriate open license or rights retention option for their work.
- g. Address the promotion and rewards concerns of researchers through policy and funding initiatives that support and enable the transition to Open Science more broadly, not just open access to publications, and which includes consideration of reforms to research evaluation and career progression. The LERU roadmap to open science may be instructive in this regard⁵.
- h. Clarify and address, through the provision of more detailed guidance, the matters identified in answer to question 1.

Reviewed and approved by RCSI Research Executive February 8th, 2019

³ <https://www.coar-repositories.org/>

⁴ <https://libraries.mit.edu/news/harvard-library/29052>

⁵ <https://www.leru.org/publications/open-science-and-its-role-in-universities-a-roadmap-for-cultural-change>