

Response to Guidance on the Implementation of Plan S

The responses to the questions below comprise feedback to cOAlition S on the Plan S guidance from the University of Southampton. These points are based on discussion at the University Open Research Group and consultation with professional and academic staff in all Faculties.

The University wholly embraces the idea of a fully open future for research and the general principle of beginning to deliver on these goals from January 2020. We, as an institution, have been deeply involved in the progress to Open Access (OA), developing EPrints open source software for institutional and subject repositories of which ePrints Soton was an early example. Overall, we are supportive of innovation and disrupting the publishing market, but we are aware of a complex and varied publishing environment.

We are pleased that there is clearer guidance on the timeline for implementation, negotiations with publishers and reviews. Our feedback largely seeks points of clarity and we request that in some cases more evidence is gathered (or presented) to help inform the decisions of key stakeholders across all affected sectors. There needs to be further assessment of potential impact and risks to avoid unintended changes to researcher behaviour, financial exposure, and to recognise the relationship between publishing and research communities. Furthermore, we do not believe it will be possible to meet some of the key technical requirements of Plan S by January 2020 and we seek clarity on all timeframes.

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

- 1.1. Because the complexities of hybrid and pure gold OA need to be carefully considered in the plan, there has been a general perception that Plan S is very focussed on Article Processing Charge (APC) based models. Indeed, it was necessary for the guidance to clarify ‘mirror publications’ are an unacceptable model to engage with – we concur. We would like the guidance to readdress this balance and explicitly outline what publishing and archiving practices are acceptable while allowing room for new, fair business models to develop.
 - 1.1.1. We endorse the archival and preservation role of institutional repositories as articulated by Plan S but ask that their positive contribution to the dissemination of OA outputs is more clearly articulated. This leverages the benefit of investment in the green global infrastructure.
 - 1.1.2. Furthermore, we ask cOAlition S to express their support of platinum/diamond OA models.
- 1.2. We recommend a continued investigation into a model institutional Scholarly Communications Licence [1] coupled with no embargo deposit of Author Accepted Manuscripts in an OA repository.
 - 1.2.1. This model is especially important for sustaining publications valued for their low-frequency high-value production (e.g. some art and microscopy journals). These valued publications should have special consideration, similar to monographs.
 - 1.2.2. In a World where SciHub and ‘predatory publishers’ operate, instead of feeling proprietary about usage statistics all stakeholders should seek better aggregation of usage indicators and develop nuanced approaches to assessing the value of research outputs in line with DORA.
- 1.3. The guidance outlines very specific, technically challenging and likely costly criteria for OA repositories to meet. If the coordinators of Plan S have specific initiatives that they are backing to meet those criteria, can they explicitly outline them? This will help institutions understand if they need to develop new tools, support community developments, or review procurement requirements.

- 1.3.1. Full text stored in XML in JATS standard (or equivalent) will be difficult for institutional repositories to implement initially. There is little conversion software available and those services which do serve JATS put a lot of human effort into Quality Assurance (QA). This is highly unlikely to be sustainable at the institutional level without investment at a national level to create repository-independent solutions.
- 1.3.2. We also wonder if XML in JATS was preferred over Scholarly HTML? Scholarly HTML would eliminate the need for Extensible Stylesheet Language Transformations (XSLT) which is required to transform XML into other usable formats.
- 1.3.3. "Continuous Availability": to what does this actually refer? Content or metadata? System downtime? Or, assurance of long-term content and metadata availability should the institution cease to exist in its current form (i.e. 'Lots of Copies Keep Stuff Safe')?
- 1.3.4. We feel that there is no harm in centralised repository services which are either fed from satellite services (institutional or otherwise) or feed into satellite services. However, we think the balance between central and local solutions will need consideration, to avoid restricting competition, innovation, and making a centralised service a single point of failure. A centralised service could be especially useful for facilitating upload/drawdown from abstracting and indexing services and publishers so that service providers and Research Institutions have fewer relationships and technical requirements to manage.

Overall, for the delivery of compliant repositories, there needs to be a more extensive timeframe for research, product and community development and procurement.

- 1.4. We support the requirement of greater transparency for APCs, but cOAlition S should consider the possibility of unintended consequences due to a fee cap. Journals which do not routinely charge or charge lower fees than an APC cap may feel empowered to start charging or increase APCs respectively. As grant holders, we would prefer acceptable parameters by which we can judge a transparent breakdown of APCs as part of our approval process and management of APC caps.
- 1.5. We recommend that cOAlition S entrust DOAJ to monitor and sanction titles that exhibit an increased acceptance rate and reduced quality of editorial control. This would mitigate the risk of DOAJ indexed journals attempting to publish larger quantities of articles that have light-touch peer-review to gain competitive advantage and offset any losses due to reduced APCs.
- 1.6. For purpose of demonstrating return on investment with content suppliers and aggregators, we recommend that Plan S require suppliers of bibliographic services to include information on the publisher and the funder for all output types with unique identifiers in a consistent format.
 - 1.6.1. We envisage publishers facilitating this via standard machine-readable fields within the XML (or equivalent) of the published research output.
- 1.7. While the phrase "open science" is interpreted broadly by many, there is still a significant and unnecessary risk of alienating academics in arts, humanities and social disciplines. We ask that Plan S strives for inclusive vocabulary.
- 1.8. We request the abbreviated term QA as it appears in 10.2 to be defined in the document to avoid ambiguity.
- 1.9. The guidance does not clarify what cOAlition S members intend to do to limit the impact on researchers working independent of funding and Institutions, regarding: "it is acknowledged that all scientists should be able to publish their work Open Access even if their institutions have limited means" (see also 1.7 on inclusive language).

2. *Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?*
 - 2.1. With some funder policies and research metrics, we have seen a change in behaviour among some groups of researchers. Sometimes this is for the betterment of those individuals and their discipline and sometimes the outcome is considered more important than the objective, leading to less favourable behaviour. We hope that funding bodies will conduct a broad impact assessment to consider not only how these changes will affect institutions financially (directly and indirectly), but also to consider how researchers might respond behaviourally. For example:
 - 2.1.1. Authors may remove themselves from papers if their international co-authors will not publish in a Plan S compliant journal, leading to ghost authorship.
 - 2.1.2. Non-Plan S authors might prefer not to publish with Plan S authors.
 - 2.1.3. Researchers in Arts and Humanities could be impacted by existing third-party rights and the Plan S license requirements. Whilst in theory CC BY licences protect existing third-party rights, the complexity of how this can be handled in practice needs more attention.

Plan S will only be truly successful as a global endeavour and we wish to highlight the potential reputational risk in regard to relationships with global co-authors and impact on the equality of publishing options for authors depending on how their research is funded. If Plan S is pursued by mostly European national funding agencies there is a risk that Europe will become misaligned with international research partners.
 - 2.2. There needs to be greater harmonisation between funders' Open Research Policies and less scope for misinterpretation. It is especially important to define who will pay an APC when collaborating with authors outside Plan S.
 - 2.3. As discussed above (1.1), we are encouraged by the potential of Plan S to support innovation in publishing and would like to explore more diverse approaches to sharing research. This includes:
 - 2.3.1. Support for OA university presses, publishing models that do not use APCs, and initiatives that facilitate improved links between different types of output and their versions.
 - 2.3.2. Developing data visualisation, electronic lab notebooks, interoperable equipment lists and software development.
 - 2.4. Open research needs a core open interoperable infrastructure to thrive, so we endorse the use of identifiers such as ORCID, open APIs and a focus on the potential of text mining. However, cOAlition S members should consider possible patenting of machine learning approaches as a risk to the detriment of progress in this area.
 - 2.5. We are pleased that cOAlition S is consulting on and researching publishing models for learned society journals [2] and we look forward to an opportunity to comment on the findings. However, we also ask them to take into account the impact Plan S will have on society members who pay their membership fees personally.

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[1] [Online]. Available: <http://ukscl.ac.uk/>

[2] [Online]. Available: <https://wellcome.ac.uk/sites/default/files/learned-societies-consultancy-request-for-proposals.pdf>