

EIROforum libraries feedback on the Guidance on the Implementation of Plan S

The EIROforum libraries appreciate and support cOAlition's Open Access aim, known as Plan S, to provide full and immediate access to publications produced by publicly funded research.

We welcome the opportunity to provide feedback on the implementation guidelines and compliance requirements as a means to supporting and facilitating the transition to a fully Open Access scholarly communication environment.

About the EIROforum libraries

The eight EIROforum organizations have extensive expertise in the areas of basic research and the management of large, international infrastructures, facilities and research programs. It is the mission of EIROforum to combine the resources, facilities and expertise of its member organizations to support European science in reaching its full potential. By combining international facilities and human resources, EIROforum exceeds the research potential of the individual organization, achieving world-class scientific and technological excellence in interdisciplinary fields. EIROforum works closely with industry to foster innovation and to stimulate the transfer of technology.

The libraries of the EIROforum member organizations have endorsed Open Access and have introduced relevant workflows in their provided services. The Libraries each to a different extent manage and support the publication process in their respective Organizations.

Feedback on the Guidance on the Implementation of Plan S

2 Plan S Compliance:

All scholarly articles that result from research funded by members of cOAlition S must be openly available immediately upon publication without any embargo period....

Our experience with STM publisher shows that openly available does not necessarily include the absence of technical barriers. For example, OSA Publishing and APS are known to require the solving of captchas before the full text can be downloaded. Such restrictions are against the [Budapest Open Access Initiative](#) declaration.

By "open access" [...], we mean its free availability on the public internet, permitting any users to read, download, copy, distribute, print, search, or link to the full texts of these articles, crawl them for indexing, pass them as data to software, or use them for any other lawful purpose, without financial, legal, or technical barriers other than those inseparable from gaining access to the internet itself. The only constraint on reproduction and distribution, and the only role for copyright in this domain, should be to give authors control over the integrity of their work and the right to be properly acknowledged and cited.

NB: This problem is addressed in 9.1, but should be stated here as well.

In addition it is our view that there should be a clear distinction in the guidelines for publications made available via Open Access journals and those published in Open Access platforms. Publications submitted to the latter currently do not need to undergo a peer-review process.

With regard to the use of the term "scholarly publications" in the implementation guidelines it is our understanding that it has no commonly accepted definition. Hence the guidelines should extend to include a glossary of the terminology used in the text to avoid confusion and disambiguation. Equally importantly it is our view that "scholarly" should not be considered a synonymous to "peer-reviewed".

9.1 Basic mandatory criteria for Plan S compliant Open Access journals and platforms:

- The registration in the DOAJ may be incompatible for hybrid journals with a transformative agreement.
- Journals that have been removed from DOAJ for legitimate reasons (e.g. "fake journals") and simply re-register must not be considered as being compliant

9.2. Mandatory quality criteria for Plan S compliant journals, platforms, and other venues:

The crucial point is not only that the full text is available in a machine readable format, but also in a standardized format that is suitable for archiving purposes (e.g. pdf/a). The machine readable format must also be standardized and not proprietary.

10. Deposition of Scholarly Content in Open Access Repositories

10.1 Requirements for authors and publishers:

Coalition S should remove "peer review".

The quality assurance can also be obtained by other means than. Using "peer-review" suggests that this is mandatory for quality assurance.

10.2 Requirements for Plan S compliant Open Access repositories:

It is not clear what "automated ingestion" means. The idea is probably to ensure that the submission process is relatively easy. The decision what to include, must lie at the repository.

It is not clear what equivalent to "XML in JATS" means. Clearly it cannot be the responsibility of a repository to convert documents into XML in JATS, while for journal/platforms "only" machine readable full text is mandatory.

The term “continuous availability” must be specified (e.g. a 100% availability is not achievable) or left out completely. The same applies to the term “Helpdesk”.

11. Transformative Agreements

A subscription journal with a “clear and time-specified commitment to a full Open Access transition” is not, in our view, binding enough for publishers and it is our concern that such a strategy allows loopholes that could eventually delay the transition -with the inclusion of conditions in the OA transformation statement - indefinitely.

In the current situation we do not see any sign of transformative agreement that are able to trigger the transition to viable business models of open access publishing.

The majority of the EIROforum libraries do not support the inclusion of transformative agreements into Plan S, because we do not see how a transformative agreement between two parties could trigger a general transition to new business models. If this is unavoidable, it should be clear from the beginning of Plan S that models with transformative agreements are only considered compatible to Plan S until the end of 2023 without any exceptions thereafter.

In the opinion of the majority of the EIROforum libraries, cOAlition S should consider to revert to the original statement that completely bans hybrid OA, for the sake of consistency with its original intentions. To focus on OA journals would also be closer to the intention to work together with DOAJ for mechanism for identifying and signaling compliance.

We also agree to the following statement by Jon Tennant on the LIS Bibliometric mailing list: “We argue that Coalition members should favor, both in words and via their spending decisions, community-controlled, no-author-fee journals over commercially owned journals charging APCs. This is for reasons of fairness, economic efficiency, and sustainability. We see Plan S as a strong statement and step in the right direction, but encourage Coalition members to be more forward-thinking about how they want the future scholarly publishing market to look, and make sure that they are giving due consideration to the non-commercial elements of the ecosystem.”

Additional Remarks

We would also like to suggest the addition of a FAQ section to the implementation guidelines that would address minor questions that have not been answered or specified in the guidelines:

- What happens in case the Plan S funded scientist has only a minor contribution and the leading scientist has no OA funds? Would the Plan S scientist be called to pay for all publication costs?
- What happens in the case of unfunded research? Will the Journals/ Platforms offer the option of the Green route?
- APCs; it is difficult both for institutions and publishers to predict/ prepare for Plan S as no data on the level of APCs has been disclosed so far. The independent and fair study on the standardization of fees proposed by Plan S should be prioritized with clear deadlines that allow enough time for PH/ LS to adjust their models and funders

and institutions to revise their OA publishing expenditure. The proposed cap should allow PH/ LS to continue offering services to the research community without though financially draining funders and institutions.

Submitted by:

Sophie Rio (ESRF), Ioanna Ydraiou (EMBL), Virginie Teissier (ILL), Keith Musgrave (UKAEA), Uta Grothkopf (ESO), Martin Köhler (EUR.XFEL), Tullio Basaglia (CERN), Ronny Houben (ESA)