



VCI Feedback on the implementation of Plan S

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

The German Chemical Industry Association (VCI) in principle supports the efforts of Plan S to make the results of publicly funded research accessible to a broad public via open access models. However, caution is needed to avoid hampering the competitiveness of high-quality researchers and their participation in EU funded public-private partnerships (PPPs) along the innovation chain.

Mandates that oblige scientists, funded by members of cOAlition S, to publish only in full Open Access rather than in well-acknowledged high-quality journals will reduce their competitiveness with respect to scientists not obliged to Plan S. This is especially true for the research-intensive regions in America and Asia. Furthermore, VCI is concerned that the participation of high-quality researchers in EU funded PPPs, as in Horizon Europe, will be diminished by the obligations of Plan S. Thus, limiting Europe's innovation potential and global competitiveness.

Neither, the impact on the scientists concerned, nor the consequences and risks for Europe as a center for innovative research or Europe's global competitiveness are addressed. If large parts of the global research enterprise do not participate in Plan S.

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

VCI advocates against the exclusion of high-quality hybrid journals formulated in Plan S, in order to maintain the global competitiveness of Europe and the scientists concerned.

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- Identification no. in the EU Transparency Register: 15423437054-40
- The VCI is registered in the "public list on the registration of associations and their representatives" of German Parliament (Deutscher Bundestag).

The VCI represents the politico-economic interests of around 1,700 German chemical companies and German subsidiaries of foreign businesses. For this purpose, the VCI is in contact with politicians, public authorities, other industries, science and media. The VCI stands for over 90 percent of the chemical industry in Germany. In 2018 the German chemical industry realised sales of more than 204 billion euros and employed around 462,000 staff.