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Comments on the implementation guide for Plan S

KTH, Royal Institute of Technology, Stockholm Sweden is positive towards the intention of an open publishing landscape as the way forward. However, there are still some unclarities on how to interpret Plan S – are these strict guidelines or are some of the demands more an intention on what cOAlition S wants to achieve in a more distant future?

Aim and scope

“cOAlition S will also promote a culture that ensures that young scholars have opportunities to excel and advance their careers.”

KTH sympathises with the intentions in the quote, but has some difficulty to interpret what that actually means. At KTH there is a concern that young researchers may be negatively affected, since they are in the middle of a shift in publication practices, where new publication channels collide with traditional quality measures, which are still heavily based on the *high impact journals*.

It is unclear what consequences that would follow, if researchers fail to follow cOAlition S.

Publication costs

KTH thinks that it is important to work towards a standardisation of publication fees and a cap for author publication charges (APCs), as is suggested in the guide. Note that an uncontrolled increase in APCs also affects the researchers who are not covered by research funders.

The guide writes that an independent study shall be made. But what mechanisms exist to control the publishers' levels of APCs, which today are influenced by parameters such as *impact* or *market value*? Today, it is considered most crucial to limit the cost of hybrid publishing, but it is also important to observe future models that may also be increasing costs.

Money flow

KTH considers it important that the goal is that funding for publication is distributed outside of the project applications/grants, that is, solutions in the future need to be centralised, so as to avoid that these publishing costs/grants are assigned to the individual research project.

We can in the future see a combination of grants from funders directly to consortia (in Sweden: the BIBSAM-consortium), where deals are negotiated on a national level or through financing on an institutional level (differing from today where instead subscriptions are handled centrally).

This is important, because:

- It creates a better negotiating position if we cooperate nationwide, that is, probably lower costs and a possibility to have an effect on technical solutions.
- Budget conflicts between APCs and project costs are avoided (cost for equipment, travel expenses, etc.).
- National/Central solutions make it possible to implement quality assessments, so as to minimise publications in questionable publication channels.
- Administration for the researcher is simplified and the researcher can concentrate on doing research.
- We get a clearer overview over costs, if they are concentrated to a national/central level.
- The feeling of having the possibility to “buy” publication is avoided.

Supporting Quality Open Access Journals and Platforms

It is good that cOAlition S wants to take initiatives and support new publication venues in subject areas that do not have an open publishing culture. However, it is for KTH unclear how this is to be implemented. Different subjects have different levels of openness, which puts researchers in more closed subjects such as chemistry at a disadvantage. It is important that these researchers are treated fair. As Plan S is formulated, it will have different effects on different subjects.

Timeline

KTH here questions how the formulations should be interpreted. Is it up to each individual member of cOAlition S to decide from when Plan S is to be implemented? KTH thinks that it is reasonable that Plan S holds for applications made earliest after the final version of Plan S went public. Researchers who apply for money need to know all requirements for the grants, and it is unreasonable if funders were to add demands to current projects.

The timeline, in relation to transformative deals, also needs to be clarified. Since the guidelines concerning Plan S and transformative deals are still to be finalised, there are deals that will be signed over three years. KTH holds for granted that these deals must be compatible with Plan S and that the transformation must be gradual, that is, that Plan S considers this more as a gradual process towards the goal, passing different stops, where all demands cannot be fulfilled in 2020.

Transformative Agreements

Definitions and criteria are needed for transformative agreements, together with details on the process for assessment and compatibility with Plan S, in particular concerning how publications shall show how they work for a transformation to

another financial model. (*The negotiated agreements need to include a scenario that describes how the publication venues will be converted to full Open Access after the contract expires*). Things must be clear for all parties involved in order to avoid misunderstanding.

On page 3 it says: “*cOAlition S emphasises that the individual cOAlition S members are not obliged to enter into transformative agreements nor to fund APCs that are covered by such agreements.*” Does that mean that it is voluntary for members of cOAlition S and up to each individual research funder to decide on the practical implementation? On the other hand, transformative agreements are described as an essential part of Plan S in the near future. That sends mixed messages and needs to be clarified.

Compliance and Sanctioning

KTH recognises that an essential part of Plan S is monitoring, so as to not make the demands without consequences. However, it is vital that everyone understands how this is to be realised. That is unclear in the current formulations, and the demands of Plan S are too specific. For individual researchers, it can be difficult to be informed of all details, for example if a specific hybrid OA-journal is compatible with Plan S or not. We therefore assume that cOAlition S provides researchers with clear assistance on the compatibility of current publishing practices with Plan S, together with specific instructions on how this is to be evaluated.

Deposition of Scholarly Content in Open Access Repositories

Plan S has strong requirements on repositories for parallel publishing of research publications. Several of today’s repositories do probably not fulfill these requirements and therefore cOAlition S may have a softer formulation where one it as recommendations and a road map than final demands for 2020. KTH supports COARs’ views on Plan S. <https://www.coar-repositories.org/files/COAR-response-to-implementation-of-Plan-S-1.pdf>

Internationally

Research is a global activity. For KTH, it is vital that Europe does not suffer a competitive disadvantage compared to, for example, Asia and the U.S. Hence it is important that cOAlition S aims to include the rest of the world. It would be highly unfortunate if the result would be that Europe is drained of its best researchers, when foreign or Swedish researchers choose to go to China or the U.S. for their postdocs. We need to ensure that Europe continues to be attractive for younger researchers.

On behalf of the KTH Royal Institute of Technology, February 8, 2019

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