

## Feedback with respect to Plan S and its implementation guidelines

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Plan S – 10 principles	Comments
1. Authors retain copyright of their publication with no restrictions. All publications must be published under an open license, preferably the Creative Commons Attribution Licence CC BY. In all cases, the license applied should fulfil the requirements defined by the Berlin Declaration;	As publications are not always limited to textual content, but may for instance also comprise data, it is suggested that a license such as the Open Database License (ODbL) would be allowed as well. Also a somewhat more restrictive Creative Commons license can be considered in order to prevent that, for example, translations of the work are commercialized. To that extent, options like CC-BY-SA ought to be more explicitly included.
2. The Funders will ensure jointly the establishment of robust criteria and requirements for the services that compliant high quality Open Access journals and Open Access platforms must provide;	A major concern among researchers is related to the potential prohibition to publish in certain “top journals”, given that these journals do not make the transition to full Open Access. How does cOAlition S intend to alleviate this concern? The fact that these criteria and requirements are to be established in a joint effort is perceived as positive, because, on the level of the individual funding agency, such an exercise would be particularly burdensome, especially for smaller funders. Still, the question remains who will be responsible for assessing whether a journal or a platform is compliant and of sufficient quality? If, as it currently seems from the implementation guidelines, the aim is to have a “plan S compliant” earmark in directories such as DOAJ, it is important that these directories receive adequate support. Whereas the explicitation of

	clear guidelines is endorsed, it is important they stay within reach of smaller scale publication initiatives which, due to the nature of the topic (e.g. law) or language, are bound to have a smaller outreach.
3. In case such high quality Open Access journals or platforms do not yet exist, the Funders will, in a coordinated way, provide incentives to establish and support them when appropriate; support will also be provided for Open Access infrastructures where necessary;	The initiatives of funders to reach conformity with the publishers or create platforms where they are lacking is crucial. While such initiatives should not be the responsibility of individual researchers or individual research institutions, it is, nevertheless, very important to include researchers in the analysis whether journals or platforms of sufficient quality are available, as well as in the incentives to establish them. As, in addition, it is currently not clear what is required and what suitable “incentives” are, a more thorough investigation is suggested, e.g. by organisations such as Science Advice for Policy by European Academies (SAPEA).
4. Where applicable, Open Access publication fees are covered by the Funders or universities, not by individual researchers; it is acknowledged that all scientists should be able to publish their work Open Access even if their institutions have limited means;	It is important that the OA publication fees are fair and reasonable. It is, however, not clear which Open Access publication fees are to be covered by the funders and which by the universities. Additionally, it is not entirely clear whether a dedicated OA fund, albeit with very strict rules on what is acceptable, is an advised way to proceed. In any case, enough attention must be paid to process management, ensuring that individual researchers are not bothered by details regarding the payment of APC.
5. When Open Access publication fees are applied, their funding is standardised and capped (across Europe);	One major concern is related to controlling the Open Access publication fees and to prevent them to collectively approach the caps. Publication fees, as such, are not dependent on discipline, although it is likely that fees generally speaking will be higher in one discipline versus the other, since more services are offered, e.g. alternative types of research might have different requirements in terms of functionalities of publication platforms (links, databases, visuals). What is important in any case, is transparency, i.e. preferably, it should be detailed exactly which service is being

	<p>offered at which price. Fees ought to be based on the real costs to run a platform and the range of services offered.</p>
<p>6. The Funders will ask universities, research organisations, and libraries to align their policies and strategies, notably to ensure transparency;</p>	<p>It is not exactly clear what should be aligned. Is this item related to the evaluation of researchers, to purchasing policies of research libraries or both? Regarding evaluation, the intentions of the DORA principles that are supported by cOAlition S seem to be lacking proper implementation details and seem too focused on impact factors. As a valuable alternative, it is suggested to consider the principles of the Leiden Manifesto for Research Metrics and thus use metrics (in as far as they are necessary) in a responsible way.</p>
<p>7. The above principles shall apply to all types of scholarly publications, but it is understood that the timeline to achieve Open Access for monographs and books may be longer than 1 January 2020;</p>	<p>It is currently unclear how to proceed for monographs. There is some concern for the survival of smaller local publishers (also for monographs) who may not be able to transform their business model fast enough. In addition, Book Processing Charges (BPC) are typically considerably higher than APC for journal publications, making that provisions to transfer to full open access will have to be substantially higher. In general, the implementation rules of Plan S seem more problematic to the social sciences and especially to the humanities where the disposition over open access platforms is less current.</p>
<p>8. The importance of open archives and repositories for hosting research outputs is acknowledged because of their long-term archiving function and their potential for editorial innovation;</p>	<p>The Confederation of Open Access Repositories (COAR), with backup from the repository community and major repository networks over the world, can offer a lot of valuable know-how about establishing and maintaining next generation repositories and, as such, would be a major player that should be involved in the discussions. The technical requirements defined in the implementation rules of Plan S vis a vis institutional repositories seem unattainable for nearly all institutions at this moment. Moreover, these guidelines seem much more concrete and strict than the requirements for OA journals and platforms, giving the impression that Plan S is struggling with the role and value of repositories. Moreover, currently it seems that big,</p>

	commercial repositories, with more resources to adapt to these requirements, would have an advantage with respect to the smaller ones, which could prove disastrous for institutional and non-profit repositories.
9. The 'hybrid' model of publishing is not compliant with the above principles;	First of all, it is not entirely clear whether this principle prohibits publishing in 'hybrid' journals or whether it simply precludes publishing in 'hybrid' journals from being funded. While the rules with respect to the 'hybrid' publishing model should be strict, in order to ensure a collective (worldwide) transition, it seems advisory, especially during transition, to show some flexibility to researchers in the implementation of these rules. The transformative agreements mentioned in the implementation guidelines still allow hybrids for a rather long transition period (provided there is a scenario to full Open Access transition). The wording concerning transformative agreements seems a bit vague, as it does not seem to imply any hard obligations on the execution of this scenario mentioned in the contract. This vagueness seems somewhat in contrast with the stringent requirements for compliant repositories.
10. The Funders will monitor compliance and sanction non-compliance.	It is currently unclear how compliance is to be monitored. As a suggestion, the OpenAIRE initiative offers tools that can be reused in the monitoring of compliance and, hence, could be considered by cOAlition S. Nevertheless, the concept of monitoring seems to comprise more than tracking the open access publications of individual researchers, and is also about providing a more global picture, e.g. is there sufficient diversity in Open Access journals and platforms, what are the effects of Plan S on international collaboration ... Also, while a formal review of plan S is planned in 2023, an in-advance effect analysis of Plan S would be of high added value. Finally, it is currently not clear what is meant by 'sanction', but in any case, it ought to be conditional on the speed of transition.

