

cOAlition S: Making full and immediate open access a reality; A response from Durham University to feedback to the implementation guidance on Plan S (February 2019)

The following forms our institutional response to the request for feedback to the implementation guidance, as published on 27th November 2018. Feedback has been collected from members of the academic community across the university through a series of hour-long departmental briefings and open workshops co-ordinated by the University Library. An initial summary of feedback was presented to University Research Committee on 24th January 2019, with a draft response then open to subsequent feedback and comment from committee members before final submission.

The feedback below outlines the university's support for the principles of open access, but a concern that the implementation guidance for Plan S currently lacks sufficient detail to make a clear assessment of the full impact of the current proposals.

Significant areas of concern focus around:

- Lack of clear information over any assessment of financial impact on funders and universities, or a risk assessment of the impact on researchers, journals, scholarly societies and other stakeholders in the scholarly publication ecology.
- An intended timeframe that does not reflect the realities of the scholarly landscape, and the ability of universities (and publishers, scholarly societies and other stakeholders) to plan for and implement changes with financial, technical and organisational implications.
- The current request for feedback does not feel like a full and meaningful consultation with the academic community, and may be counter-productive in transitioning to an open research environment.

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

1. Aims and Scope

*Plan S aims for full and immediate Open Access to publications from publicly funded research. The coalition of research funders that have committed to implement Plan S, known as cOAlition S, therefore calls for **a definitive shift towards new models of academic publishing**. cOAlition S aims to accelerate the transition to a scholarly publishing system that is characterised by **immediate, free online access to, and largely unrestricted use and re-use of scholarly publications**. cOAlition S recognises that research funders, institutions, researchers, learned societies, librarians, and publishers must work together towards a system of scholarly publishing that is more accessible, efficient, fair, and transparent. cOAlition S will **also promote a culture that ensures that young scholars have opportunities to excel and advance their careers**.*

*cOAlition S is committed to fulfil the specific target set out in Plan S – immediate Open Access to all scholarly publications from research funded by coalition members from 2020 onwards. cOAlition S does not favour any specific business model for Open Access publishing or advocate any particular route to Open Access given that there should be room for new innovative publishing models. Plan S applies to all scholarly output that is reviewed according to accepted standards within relevant disciplines and is based on results from research funded fully or partially by cOAlition S members. In addition, cOAlition S strongly encourages that research data, preprints, and other research outputs are made openly accessible, subject to the usual legal and ethical considerations. cOAlition S **supports the intentions of the San Francisco Declaration on Research Assessment (DORA) that research needs to be assessed on its own merits rather than on the basis of the venue in which the research is published**. cOAlition S members intend to sign DORA and implement those requirements in their policies.*

*The following guidance further specifies the principles of Plan S and provides paths for their implementation regarding scholarly articles. The guidance is directed at cOAlition S members and the wider international research community. cOAlition S will, **at a later stage, issue guidance on Open Access monographs and book chapters**.*

1.1 Response from Durham University

1.1.1 Durham University recognises the benefits of open access, and our open access policy emphasises the university's commitment "to sharing the findings of its world-class research as widely as possible to enhance its use and impact within the academic and research community and more widely within society".

1.1.2 Durham University also recognises the need to address the increasing costs of access to quality scholarly research, with our current resources budget unable to meet the demands of our academic and student communities.

1.1.3 There is widespread support of these two stated aims amongst individual academics, and a recognition that whilst significant changes is still needed, despite some progress in recent years.

1.1.4 Whilst the aims of cOAlition S are laudable, the university and many individual academics would like to see more guidance addressing the potential impacts in the following areas:

1.2 Scope of implementation

1.2.1 We believe the transition to a sustainable model of open access monograph publication needs to be gradual, as the transition to more open access scholarly articles has been. We welcome the indication that guidance on open access monographs and book chapters at a later stage is welcomed, as are the previously published principles of Plan S that "the timeline to achieve Open Access for monographs and books may be longer than 1 January 2020."

1.2.2 There remain concerns over the range of models and the often significant costs of open access monograph publishing. Whilst we recognise that there is now a wider range of publishing options, many current research projects already have a publication contract in place (or under negotiation) but the monograph is not expected to be ready for publication for some time.

1.2.3 Clarity is also sought on the scope and expectations of open access when applied to traditional outputs in some discipline areas, such as creative writing or working papers (which may subsequently be published in other forms, including journal articles and long-form publications).

1.3 Academic recruitment and progression

1.3.1 Durham University is a [signatory of DORA](#), and has published a [statement on the responsible use of metrics](#), and a [policy on the responsible use of metrics](#) agreed by University Senate.

1.3.2 Durham University recognises the importance of assessing research on its own merits, and not using the venue of its publication as a proxy measure for the quality of individual research outputs.

1.3.3 However, Durham University recognises it takes time for such policies to see a practical implementation across different departments, where differing disciplinary customs are entrenched.

1.4 Sustainability of journals in the international context

1.4.1 The University recognises there are different models by which journals might make a transition to being fully open access, many of which do not require a switch to an author-pays model, and is supportive that the aims and scope of Plan S allow for different approaches by publishers to be explored.

1.4.2 Concerns have been expressed over the **ability of journals to transition to new models of academic publishing** and remain viable over what will be for many a short timescale.

1.4.2.1 Durham University applauds [the partnership with the Association of Learned & Professional Society Publishers \(ALPSP\)](#) to engage the services of a consultant to explore the range of business models that might be available to learned societies to aid them in meeting the requirements of Plan S. However, concerns remain over the ability of Scholarly Societies in particular, which may not have the flexibility and resources

available to larger commercial publishers, to quickly review what models might best allow their publication venues to remain sustainable.

1.4.2.2 These journals, unlike larger commercial publishers, rely on subscription income to fund research posts for ECRs, conferences for the further dissemination of research and other research activity, and that this could be threatened both by a sudden reduction in income generated by journals or the lack of certainty in the short term resulting from a significant change in business model. This may reduce the ability or willingness to invest at the same level in wider support activities such as these until certainty returns.

1.4.2.3 There is concern, specifically amongst some academics within the Arts and Humanities that journals across these disciplines may be particularly affected where:

a There is a lack of evidence as to the potential impact on arts and humanities journals that often have narrower profit margins and a greater level of market sensitivity than titles in many other disciplines.

b The range and type of content varies across disciplines, with book reviews, review articles, letters and discussion articles forming vital roles within wider scholarly discourse, but not easily lending themselves to an author/funder/institution pays model of publication. [See also the potential impact under 4.2.1.1]

c A broader remit of scholarly journals including content from independent and ‘community’ researchers unaffiliated with institutions or in receipt of funding, who (i) may be ineligible for or unaware of cost-waivers for author-pays gold open access models and (ii) may create difficult decisions for journal editors who need to maintain an income to sustain their journal without damaging the current symbiotic relationship with a diverse author community and readership.

1.4.3 The above concerns are also reflected in the scope of Plan S, which as a European coalition’s response does not fully reflect the **international nature of scholarly publishing**.

1.4.3.1 It remains unclear as to how publishers (in all their forms) will respond to pressure to adapt their current business models in response to what constitutes a small (if valuable) proportion of their current market (both in terms of readership and contributions of content, editorial and peer-review work).

1.4.3.2 Some disciplines in particular are more heavily dependent on access to (and involvement in) the scholarly discourse published in journals from non-UK sources, such as many of the university presses in the United States. It remains unclear how the wider impact of Plan S (in terms of redirecting funding currently used to pay for subscription access, or restrictions on where authors can publish the outputs of Plan S funded work) might impact upon the current research environment.

1.4.4 Questions have also been raised over how the switch to a predominantly Gold Open Access journal ecology might impact on the **flexibility of universities and funders to react to external budgetary pressures**.

1.4.4.1 Under the current publishing model, libraries might be required to react to such pressures by cancelling subscriptions to less heavily used journals.

1.4.4.2 Under several different Gold Open Access publishing models, flexibility may be reduced resulting in both (i) difficult decisions put into the hands of academic management, with EDI implications for which publications or authors will continue to be supported and (ii) the knock on effect this may have on the sustainability of journals which then lose both income and quality research content.

1.5 Feedback: Aims and Scope

1.5.1 Whilst Durham University supports the stated aims of Plan S, it recognises the concerns of its constituents and makes the following broad recommendations:

1.5.1.1 It would be helpful to see a broader piece of work outlining a range of existing platforms and business models which would be seen as meeting the requirements of Plan S, to help address some of the concerns of authors and institutions; the present focus is primarily on the existing pre-dominance of author-pays models of open access publishing. The current invitation for a consultancy for scholarly societies addresses only part of

this broader picture, and it seems unlikely that this will have time to produce results in a timeframe which would allow sufficient review and action to be taken by January 2020.

1.5.1.2 It would be helpful to see direct consideration of concerns expressed around publishing in the arts & humanities, specifically around the sustainability of journals and the scope of the requirements around specific output types and licensing which allows the creation and use of adapted & derivative works. The current “one-size fits all approach” risks widening divisions by failing to address disciplinary specific concerns.

1.5.1.3 It would also be helpful to have a better understanding of work undertaken or discussions in progress with funding bodies, publishers and research organisations in an international context.

1.5.1.4 A clearer view of the funding and support available to support the aims and scope for Plan S is essential to allow universities to plan for different potential scenarios. Universities will need to have a full understanding of implications and time to plan for impact on both research and library budgets and, beyond signing DORA, policies and practice around academic recruitment and career progression.

1.5.1.5 Clarify guidance around requirements for differing scholarly publication formats, or where these might be in place at a later date, a clear roadmap of when requirements will come into force. Implementation must account for the significant lead-times before publication which might need to be accounted for. Consideration should also be made as to the potential for significant increases in the costs for institutions who publish large numbers of long-form scholarly outputs, and the disparity between institutions across the sector. This may have unintended consequences for incentivizing publication of certain output types linked to the availability of funding rather than the appropriate format for disseminating quality scholarly research.

2. 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. They must be permanently accessible under an open license allowing for re-use for any purpose, subject to proper attribution of authorship. cOAlition S recommends using [Creative Commons licenses \(CC\)](#) for all scholarly publications and will **by default require the CC BY Attribution 4.0 license for scholarly articles**.*

*Scholarly articles are compliant with Plan S if they are published in compliant Open Access journals or on compliant Open Access platforms. In addition, cOAlition S will, under specified conditions, **accept deposit of scholarly articles in Open Access repositories** and, in a transition period, publishing Open Access in subscription journals (‘hybrid Open Access’) under transformative agreements as means to achieve compliance with Plan S.*

Open Access journals or Open Access platforms	Deposition of scholarly articles in Open Access repositories	Transformative agreements
Authors publish in a Plan S compliant Open Access journal or on a Plan S compliant Open Access platform with a CC BY license.	Immediately upon publication, authors deposit the final published version of a scholarly publication (Version of Record (VoR)) or an Author's Accepted Manuscript (AAM), in a Plan S compliant repository. The document is made available immediately open access (with no embargo) under a CC BY license.	Authors publish Open Access with a CC BY license in a subscription journal that is covered by a transformative agreement that has a clear and time-specified commitment to a full Open Access transition.

More details on the requirements for individual publications and for journals, platforms, repositories and transformative agreements can be found below in the section ‘Technical Guidance and Requirements’.

cOAlition S intends to work with the [Directory of Open Access Journals \(DOAJ\)](#) and the [Directory of Open Access Repositories \(OpenDOAR\)](#) to establish mechanisms for identifying and signalling whether journals/platforms and repositories, respectively, are in compliance with the cOAlition S requirements. Irrespective of the form of publication, cOAlition S recommends that all publications and also other research outputs are deposited in open repositories and request that publishers facilitate deposit. Deposit of research outputs in open repositories is recommended to ensure long-term archiving, research management, and to support maximum re-use.

2.1 Response from Durham University

2.1.1 Durham University recognises the importance of a plurality of scholarly publishing models in an international context, and welcomes the implementation guidance in clarifying some concerns over the place for differing models under Plan S.

2.2 Sustainability of journals in the international context

2.2.1 Durham University welcomes the move to reducing the enforcement on authors by publishers of embargos on manuscripts deposited in open access repositories.

2.2.1.1 It is noted that some publishers (Sage, Cambridge University Press) already allow deposit without embargo.

2.2.1.2 It is also noted that prior to the implementation of the existing RCUK and Wellcome Open Access policies, several other publishers also allowed authors to deposit without embargo (Elsevier, Springer) but have since removed or restricted this option, and require embargos of up to 36 months in length. It is hoped that transitioning back to a zero-embargo environment will be less difficult for these publishers.

2.2.1.3 It is noted with in some research communities that the existing options for journal publication in their field are primarily in titles published in jurisdictions outside of the cOAlition S member states (in particular, well-respected US university presses) who may not feel there is a need to relax current embargo requirements for Plan S funded authors.

2.2.2 As indicated in [\[1.4.3 – 1.4.3.2\]](#) and [\[2.2.1.3\]](#), there is some concern over how journals with an international audience and community of authors will be incentivised to change their business models to meet Plan S requirements.

2.2.2.1 A question remains around whether Plan S funded authors will face a competitive disadvantage in any potential two-tiered scholarly publication environment, both having a smaller range of venues to publish in, and [as noted in [1.4.3.2](#)] the potential for having reduced access to scholarly discourse that remains behind a subscription barrier.

2.2.2.2 Equally, some authors have asked whether, if journals move to different models, some author-pays models may price non-Plan S funded authors out of publishing in Plan S compliant journals.

2.3 Licensing and Copyright

2.3.1 The University recognises that appropriate licensing of open access content is essential to realising the full benefits of access and re-use of scholarly research, with a current focus on text- and data- mining activities.

2.3.1.1 The University also recognises that the CC BY ND licence, whilst highlighted as a preferred licence by some authors and learned societies who are concerned about the freedom for others to create and disseminate adapted versions of their work, places restrictions on legitimate research activity such as text- and data- mining which many funders and researchers find unacceptable.

2.3.1.2 It remains unclear, however, what redress is available to authors who have genuine concerns over poor quality adaptations of their work, for example through the creation and dissemination of inaccurate translations. The appropriateness of the existing Creative Commons licences, or of existing guidance to assuage these concerns, should be reviewed and clearly communicated.

2.3.2 The University supports the approach to licensing being standardised across all open access routes available to authors. If it is agreed that a specified licence is the most appropriate licensing to offer for outputs available under a gold open access option, it seems difficult to understand why a different licence would be required for the manuscript version of that article.

2.3.3 The guidance around third party copyrighted materials (e.g. images) in open access publications is insufficient.

2.3.3.1 Whilst the guidance indicates that such content is “not affected by these requirements” and that “more restrictive licences” are applicable to this content if required to a rights holder, the reality in some disciplines is more complicated.

a In some fields, permission to publish or disseminate online may be restricted, or accrue a fee which may be at odds with the financial sustainability of the publication venue or funds available to the author.

b Whilst redaction of the third party content from an open access version of the publication may be an option, this may devalue the integrity and re-usability of the output as a whole.

2.4 Feedback: Compliance

2.4.1 Durham University makes the following broad recommendations:

2.4.1.1 The University supports the move to reduce the embargo periods required by some publishers via the green open access model, but as in [\[1.5.1.3\]](#) it would be helpful to have a better understanding of discussions with funding bodies, publishers and research organisations in an international context, specifically around the reduction of embargo periods.

2.4.1.2 It is unclear at present, from the implementation guidance, how likely a potential two-tiered scholarly publication environment might be the unintended result (one for Plan S funded authors, and one for non-Plan S funded authors), and what support might be available for authors to move between the two (for example, Plan S funded ECRs to build up a publication portfolio that would meet the requirements of Plan S and the expectations of non-Plan S institutions). Advice and guidance on how Plan S funding bodies might support an academic navigate their career development through this difficult environment would be welcomed.

2.4.1.3 There are clear differences in opinion over the appropriateness of recommended creative commons licences across the disciplines, and guidance as to real-world solutions to voiced concerns seem to be lacking or poorly understood. We would recommend therefore that any policy which significantly changes the requirements around the licensing of scholarly output is accompanied by robust discussion around the issues involving all parties, and clear guidance and advice for authors and institutions, to avoid differing positions becoming further entrenched through misunderstanding.

2.4.1.4 A more robust approach as to how outputs where third party copyrighted content might be integral to the understanding of the output as a whole should be considered, with the use of exemptions from compliance if necessary.

3. Publication costs

There exist different models of financing and paying for Open Access publication. cOAlition S calls for full transparency and monitoring of Open Access publication costs and fees. Transparency on Open Access publication costs and fees is included as one of the criteria that define Plan S compliance of journals and platforms.

Where article processing charges (APCs) apply, cOAlition S will contribute to establishing a fair and reasonable APC level, including equitable waiver policies, that reflects the costs involved in the quality assurance, editing, and publishing process and how that adds value to the publication. To help inform the potential standardisation of fees and/or APC caps, cOAlition S will commission an independent study on Open Access publication costs and fees (including APCs).

cOAlition S members will ensure financial support for OA publishing via the prescribed routes to compliance. Grants can be used for financing APCs for Open Access publication in subscription journals ('hybrid Open Access') only under transformative agreements. 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.

3.1 Response from Durham University

3.1.1 The University recognises the importance of a diversity of models to achieving immediate open access, including different models which do not rely on an ‘author-pays’ APC model. However, as noted in [1.5.1.1] it would be helpful if this was more clearly reflected and summarised via cOAlition S to help assuage concerns and provide some indication of examples of models which journals and universities might pursue.

3.1.2 In addition, the University strongly supports the aim to increase the transparency around the costs of open access publishing, as well as the review of and establishment of a framework to monitor and control excessive or unjustified costs placed both on readers and authors.

3.1.3 However, the failure to provide any information as to levels of funding available and approaches to caps on APCs or other Gold open access business models means there is insufficient information at present for universities and research organisations to properly assess the cost implications.

3.2 Sustainability of journals in the international context

3.2.1 Plan S indicates a requirement for the full, clear and transparent cost of journals, but it is unclear how wide the scope of this requirement will be.

3.2.1.1 Most journals rely heavily on the ‘in-kind’ provision of academic staff time, providing expertise in editorial roles, providing peer-review services and other activities. Will journals be required to publish these as costs, and if so will there be standard guidance on expectations of how this is reported that takes into account disciplinary differences in how these services are provided?

3.2.1.2 In addition, further clarity is required as to how Plan S member organisations envision this being reflected in fair and reasonable APCs, and why this implementation guidance does not appear to reflect this requirement for transparent costs for journals operating under different models.

3.3 Feedback: Publication Costs

3.3.1 Durham University makes the following recommendations:

3.3.1.1 The University supports moves to increase the transparency on costs of scholarly publishing, which reflect the full range of support provided by the academic community, but that this should be standardised across all publishing models, not only hybrid or fully open access journals operating on an author-pays APC model.

3.3.1.2 A clear assessment of cost implications is undertaken, in consultation with the university sector, and information on both available funding and restrictions on its use (e.g. caps on APCs or use in other Gold OA funding models) are clearly indicated in sufficient time for universities to plan for how existing budgets for access to content might be realigned.

4. Supporting Quality Open Access Journals and Platforms

*cOAlition S intends to **jointly support mechanisms for establishing Open Access journals, platforms, and infrastructures where necessary in order to provide routes to open access publication in all disciplines. cOAlition S explicitly **acknowledges the importance of a diversity of models and non-APC based outlets.** cOAlition S will commission a gap analysis of Open Access journals/platforms to identify fields and disciplines where there is a need to increase the share of Open Access journals/platforms. cOAlition S members will collectively establish incentives for establishing Open Access journals/platforms or flipping existing journals to Open Access, in particular where there are gaps and needs.***

4.1 Response from Durham University

4.1.1 Durham University recognises the importance of a diversity of routes to achieving immediate open access, and supports the initiatives identified for addressing disciplinary differences.

4.2 Sustainability of journals in the international context

4.2.1 Some concerns have been expressed over whether publishers switching business models will have an impact on the important role journals provide both around selectivity and the quality control of published research, to aid academics in finding and correctly understanding the research of others. It is recognised that publishers will need to maintain the means to sustain the development of journals and publishing platforms, and to retain an incentive to remain in the publishing industry.

4.2.1.1 As noted in [1.4.2.3.a], this may be of particular concern in some areas of the Arts & Humanities where profit margins are small and journals are more financially sensitive.

4.2.2 A number of Durham Academics with editorial or other roles with academic journals have indicated they are struggling to get to grips with the options that may (or may not) be available to them, and how to manage the risk of transitioning journals from a reliable income stream to a new model which may have unforeseen consequences.

4.2.2.1 It is therefore essential that any established incentives, support or infrastructure is clearly communicated as far in advance of any compliance requirements are put into place as possible.

4.3 Appropriateness of open access journals and platforms

4.3.1 There is an ongoing perception that many pure open access journals are problematic, focussing more on publishing 'volume' as an income stream and little care given to processes of selectivity, peer review and editorial control.

4.3.2 Whilst it is recognised that having bodies independent of Plan S Member Organisations providing a means to assess compliance and quality assurance of journals is essential to ensure a distance between funder and selection of outcomes, it is important that this activity is monitored by funding bodies to ensure standards are maintained in line with expectations of the academic community, and there are appropriate avenues of redress for both publishers and authors should there be reason to challenge or question information provided by such systems.

4.3.3 It has also been noted that not all OA Platforms currently seem to reflect the needs of different disciplines, even where they might indicate that they are cross-disciplinary.

4.3.2.1 Submission, deposit and other processes need to reflect varying disciplinary needs, in both the guidance provided, the questions asked and the data and information required of publishers and authors to provide.

4.4 Feedback: Supporting Quality Open Access Journals and Platforms

4.4.1 Durham University makes the following recommendations:

4.4.1.1 Adequate consideration should be given to the potential for the impact on smaller or more financially-sensitive journals which publish comparatively small amounts of high quality research in subjects not within the scope of other existing publication venues.

4.4.1.2 Further information is required as to how open access journals and platforms are assessed for both compliance and quality review, and clear guidance is provided as to redress available to authors who believe they or another has been provided with misleading or inaccurate information.

4.4.1.3 Journals, universities and authors need information as to incentives and infrastructure available for publishing bodies to consider transition to new models of publishing as far in advance of compliance criteria

coming into force as possible. At the least, a clear timetable as to when information can be expected should be published.

5. Timeline

cOAlition S appreciates that the timeline for implementation of Plan S will vary among member organisations.

Implementation of Plan S will take place from 1 January 2020, having impact on either 1) existing grants, 2) new projects/grants or, at the latest, 3) new calls. cOAlition S members should, at the very least, implement the new requirements in all calls issued after 1 January 2020.

5.1 Response from Durham University:

5.1.1 The University recognises that the announcement from cOAlition S (in September 2018) and the subsequent implementation guidance gives a clear indication of the member organisations resolve to see new requirements coming into force from 1 January 2020.

5.1.2 The University recognises that, whilst there are concerns from some quarters of the academic community, for the member organisations this is the next stage of a clear direction of travel for the realisation of open access to publicly funded research, which has been in process for over a decade.

5.1.3 However, the University also recognises that for many of its members, there are competing concerns:

5.1.3.1 For academics already engaged in research projects funded by member organisations, publication plans may already be in place which have involved negotiation and/or contractual obligations with partners and co-funders (which may include commercial organisations or co-authors not in receipt of Plan S funding).

5.1.3.2 Similarly, some academics may already have publication contracts in place, or have submitted outputs to publication venues where it is unclear if they will (or will not) be compliant with Plan S if the output is accepted for publication.

5.1.4 This creates a dual dilemma for academics in receipt of funding from Plan S member organisations

5.1.4.1 Lack of certainty that may affect current or planned funding applications over what compliance requirements may be required to be met and what options in a changing market might be open for them, and how these might be addressed with other funding or research partners with differing priorities.

5.1.4.2 Concern for authors of forthcoming publications who are uncertain if, once accepted, they will meet compliance requirements that may differ from the current status quo.

5.1.5 There also remains an issue of the often-unclear relationship between specific research projects or funding awards, which may underpin future publications but may not be directly acknowledged for a variety of reasons.

5.2 Feedback: Timeline

5.2.1 Durham University makes the following recommendations:

5.2.1.1 Implementation takes the form of a series of steps towards compliance, with some allowance for non-compliance offered for outputs accepted for publication within the first 12-24 months of implementation.

5.2.1.2 An initial implementation from 1 January 2020 for new calls for funding only (e.g. limited to outputs which acknowledge funding under awards where funding calls were announced after January 2020). This may also alleviate some pressure on publishers and universities who may be updating policy and processes and negotiating transformative agreements.

5.2.1.3 A date in the future, clearly indicated in advance, from which all outputs acknowledging any funding from Plan S member organisations will be expected to comply. We would recommend this could align either to

the REF in the UK (e.g. all scholarly articles accepted for publication on or after 1st January 2021) or in line with the latest end date for transformative open access agreements (31st December 2024).

6. Review

In 2023, cOAlition S will initiate a formal review process that examines the effects of Plan S. The main focus of the review will be to examine the effect of transformative agreements as well as the option of providing immediate Open Access to subscription content via open repositories, on achieving a transition to full and immediate Open Access.

6.1 Response from Durham University

6.1.1 Durham University welcomes the intention to review the effects of Plan S, but has four key questions around the timing and scope of the review.

6.1.1.1 In the UK context, any implementation needs to align with the next REF cycle, with clear guidance as to requirements and timetable in place for all stakeholders.

6.1.1.2 Under the current implementation guidance, transformative agreements can be signed before the end of 2021, for a period of no longer than 3 years. Agreements may therefore extend through to as late as 31st December 2024 (post- review). It is not clear, therefore, if the review will be able to provide useful and conclusive data on the timeline as suggested, and so it is unclear what running a review in the indicated timeframe would offer in terms of benefits to the scholarly community, in return for the potential cost.

6.1.1.3 A formal review of the contribution of open access repositories to achieving full and immediate open access would be welcomed, but institutions and other repository providers will need advance notice of what and how data will need to be collected, over the whole period, to ensure the review has sufficient meaningful and robust data to inform practical outcomes.

6.1.1.4 Whilst a formal review following the implementation of Plan S is welcomed, there is some concern that an exercise to collect and review data around potential impacts or areas of stress should also be undertaken, which current timeframes do not avail themselves of.

6.2 Feedback: Review

6.2.1 Durham University makes the following broad recommendations:

6.2.1.1 Clarity is required for HEIs on how the review timetable fits with both requirements that may be applicable under the UK's Research Excellence Framework (REF) and commercial negotiations with publishers which may straddle the review period.

6.2.1.2 Open Access Repository providers are consulted in advance as to the scope of the review, and the data that might be useful to collect and standardise.

6.2.1.3 Whilst Durham University appreciated the opportunity to provide feedback at this stage, there should be a commitment to an ongoing dialogue with the academic community to help shape Plan S. This could include consideration for the collection of data to inform the implementation of Plan S around concerns from the academic community before January 2020 (or any implementation which involves sanctions across all disciplines).

7. Compliance and Sanctioning

The individual members of cOAlition S will align their grant agreements and/or contracts with Plan S and monitor compliance and sanction non-compliance through enforcing contractual requirements.

7.1 Response from Durham University:

7.1.1 The University supports the principle of sanctioning non-compliance, as the Wellcome Trust and some other funders have done for several years, provided that there is sufficient flexibility to allow for occasional errors to be accepted without disproportionate penalties.

7.1.2 As noted in [4.3.2], sanctioning of non-compliance should also be accompanied by a clear route for authors and institutions to challenge decisions where third-party involvement (where this could be a co-author, co-funder, publisher or other) is involved.

7.1.3 Clarity over what form sanctions will take needs to be provided before we are able to give full feedback on this aspect of the implementation plans.

7.2 Recommendations: Compliance and Sanctioning

7.2.1 Durham University makes the following broad recommendations:

7.2.2 The University supports the principle of sanctioning non-compliance, provided that there is sufficient flexibility to allow for occasional errors to be accepted without disproportionate penalties.

7.2.3 Clarity over what form sanctions will take needs to be provided before we are able to give full feedback on this aspect of the implementation plans.

8-11. Technical Guidance and Requirements

8: Licensing and Rights

9: Open Access Journals and Platforms

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

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

9.3 Recommended additional criteria for journals and platforms

10: Deposition of Scholarly Content in Open Access Repositories

10.1 Requirements for authors and publishers

10.2 Requirements for Plan S compliant Open Access repositories

11: Transformative Agreements

8.1 Recommendations: Technical Guidance and Requirements

8.1.1. In response to the technical guidance and requirements outlined for feedback, we have summarised our response to sections 8-11 as below.

8.2 Licensing and Rights: As noted in [\[2.3.1 and 2.4.1.3\]](#), we recognise there are significant concerns amongst some academic members of the arts & humanities, and recommend there is a robust discussion around the issues involving all parties, and clear guidance and advice for authors and institutions, to avoid differing positions becoming further entrenched through misunderstanding.

8.3 Open Access Journals and Platforms:

8.3.1 It is not clear why some of the basic mandatory criteria for “Plan S compliant Open Access journals” listed under 9.1 are not also basic mandatory requirements for “Plan S compliant journals” under 9.2; All journals and platforms should be held to the same basic requirements around (1) having a “solid system in place for review according to the standards within the relevant discipline...”, (2) having any form of “mirror/sister journal with substantial overlap” and (3) “use of DOIs as permanent identifiers.”

8.3.2 It is unclear to what extent requirements be required to be retrospectively applied to back-issues of journals? For example, provision of citation metadata, metadata on funding, OA status and licence, use of DOIs and long-term digital preservation. Will Plan-S funders provide funding to support publishers to meet these requirements, or will requirements only apply to content published after the implementation of Plan S requirements?

8.3.3 Waivers appear to be limited to authors from low and middle income countries. However, in some disciplines (in particular areas of the arts & humanities), many journals publish content from independent researchers (as noted in [\[1.4.2\]](#)), who may be unfunded and may also have no institutional affiliation. We would recommend consideration is given to how these authors are affected by journals switching to a pure open access model that requires an APC paid by an author, and whether it is desirable and sustainable as a business model for journals to extend a requirement for a waiver to authors without an institutional affiliation in high-income countries?

8.3.4 We have seen a proliferation of mirror journals, [in particular from one large commercial publisher](#), with marketing campaigns targeting authors. These journals appear to be clearly non-compliant (advertised as having the same editorial board for example) but this may not always be clear. We recommend that the guidance around this requirement is clarified as to how such journals will be identified, and where it is not easy to identify such a journal how authors publishing in them will be treated by Plan S compliance and sanctioning rules.

8.3.5 It is unclear as to whether requirements to make available transparent costing will include ‘in-kind’ academic staff time in editorial and review roles? If so, how will this be required and will a standard model be expected to make it clear what this information means and allow for easy comparison? Who will be responsible for determining this standard, taking into account disciplinary differences and scope of journals? We would recommend that this section needs some additional clarification for journals and editorial boards.

8.3.6 We would recommend the adoption of ORCID as the preferred PID, not as an example PID.

8.4 Deposition of Scholarly Content in Open Access Repositories:

8.4.1 We fully support the move to reducing embargos on access entirely. As noted in [\(2.2.1.1\)](#) several major publishers already allow access via a repository without embargo (Cambridge University Press, Sage) as a tool for raising the discoverability of the article. We also note that prior to the publication of the Finch report and current RCUK Open Access policy, several publishers (Elsevier, Springer included) allowed authors to deposit without embargo.

8.4.2 If deposit of a policy in Sherpa/Romeo is required, it should be ensured that this service is resourced and maintained appropriately. In addition, the current user-interface should be adapted to allow for simple, human-readable interfaces usable by authors with all levels of experience, and not copyright experts or repository staff (and a standardised format for deposit of publisher self-archiving policies be considered).

8.4.3 We have significant concerns over the costs and time required to enable most (if not all) institutional repositories to meet the requirements around automated manuscript ingest facility, storage of full text in

JATS XML and other requirements. Whilst we support the principle of such requirements to enable full access and re-use of deposited content, we require a much longer timeframe to review and implement the costs and approach to achieving compliance, and the sector as a whole may benefit from a co-ordinated level of funding and support to achieve the stated goals.

8.4.4 The ongoing costs of creating JATS based XML are not negligible and it is unclear which party would be expected to bear this cost.

8.4.3 The detail on any of the technical requirements for Open Access repositories is insufficient to allow repository providers (such as universities) to specify the software enhancements that would be necessary to achieve compliance. For example:

8.4.3.1 To what services should an automated manuscript ingest facility be open, and should a particular protocol be supported?

8.4.3.2 Should the open API to access content support a particular standard?

8.4.3.3 Does full text marked up in JATS format XML need to satisfy any particular level of compliance (there are several flavours of JATS, which is a highly complex standard) and should the rendering of the articles in the browser be derived from the JATS version or is it acceptable to present the user with a PDF?

8.4.4 The lead time between clarification of the requirements and the point at which compliance has to be achieved needs to be at least two years. Some repository systems are open source, but maintainers may not have sufficient development effort available. Other repositories are commercial and the institutions using such services may have insufficient leverage to obtain the improvements.

8.5 Transformative Agreements

8.5.1 It is not clear at present how the description of "how the publication venues will be converted to full Open Access after the contract expires" will be assessed during contract negotiation (in terms of appropriateness and viability), and how binding that element would be on publishers?

8.5.2 The University also has concerns over the costs of supporting multiple such agreements. Agreements with two large commercial publishers in the UK already present a significant additional cost to institutions to support the open access activity of 'read and publish' deals. We would recommend that the costs of such deals are confirmed as being able to be supported using funding from the Plan S Member bodies, and suitable monitoring of these costs is implemented.

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

A single repository infrastructure

NIH, Wellcome Trust and several other research funding bodies have for many years required open access through a specified repository infrastructure: PubMed Central and its network of repositories, such as Europe PMC.

One option which could be investigated would be to establish a single (or series of linked) Plan S repositories (which could be new infrastructure or make use of existing repositories (e.g. Zenodo)) through which compliance could be met, with requirements for deposit meeting some of the areas of concern expressed in our response to question 1, and the expectations of cOAlition S member organisations:

- Take advantage of the alignment of policy and resources across multiple funding bodies to create a shared support infrastructure as opposed to a blunt policy driver.
- Work towards publisher deposit of both manuscript and metadata through agreed standards that aid the discovery and re-use of deposited research.
- Require access to deposited manuscripts without embargo.
- Address re-use requirements and concerns over licensing by providing a clear, standardised re-use licence based on creative commons licences, but allowing specific re-use cases (teaching, sharing, text- data-mining) and facilitating contact with rights holders for other identified re-use purposes through a uniformed system making use of PIDs (ORCID, FundREF, Ringold etc.)
 - Review licence and identified use-cases periodically, and liaise with the academic community and publishers over concerns.
- Transformative agreements could address publishers where 100% of content is deposited in-line with Plan S requirements, and the costs to implementing processes for publisher deposit and new metadata requirements.
 - A single repository infrastructure may reduce overhead costs and transaction costs for funders, institutions and publishers and remove administrative burden from authors almost entirely.
- A single repository infrastructure would allow for simpler and standardised citation and attribution for citing authors and those who re-use open access content.
- A single repository infrastructure may allow for better means of assessing the benefits offered from providing open access to research publications, by monitoring views, downloads and citations to open access content.
- Offer a means to take advantage of economies of scale, allowing for a delivery platform for open access monographs for publishers, whilst publishers transition to a first print-run / print-on-demand provision for libraries and other readers.
- Institutional repositories could, under the prerogative of their owning institutions;
 - Focus on long-term preservation of published and unpublished content affiliated with the institution.
 - Continue to provide open access to unpublished research publications.
 - Provide digitisation and open access to archival and special collections content, theses and grey literature.
- Tools for accessing, mining, analysing and interpreting content within the repository could be built upon the repository infrastructure.

Requirements on publishers to provide transparent costing and pricing information could (and should) still be required, and the cost of subscriptions and any other publication or open access costs could be monitored and addressed separately.