

Feedback to the Plan S implementation guidelines
from the Belgian delegation to the ERA Standing Working Group on
Open Science and Innovation (SWG OSI)¹
in agreement with the consultation group on Open Science of the
"INTERNATIONAL CO-OPERATION" COMMISSION (ICC) and the
"FEDERAL CO-OPERATION" COMMISSION (FCC) of the Interministerial
Conference of Science Policy of Belgium
(aka Belgian CIS-CFS consultation group on Open Science)

Preamble

Plan S constitutes a major step towards open access. Honouring such a commitment in such a short time frame requires - for the sake of simplicity – to recourse to the following already existing and non-exclusive paths:

1. The first path consists in publishing journals and books in open access ("Gold Open Access"), which implies either institutional funding of platforms or journals operated by institutions or scientific communities ("Diamond Open Access" model) on the one hand, or the payment of publication fees according to "Fair Open Access" business models on the other hand.
2. The second path consists of depositing and making the publication available in a reliable open access repository ("Green Open Access") without embargo or with embargoes to be kept as short as possible taking respective national legislations into account.

It is essential, while building on what already exists, to also consider the development of other, more innovative routes. PlanS still tends to focus on the "APC" option (Who will pay for them? Will they be capped?). It does not sufficiently address the whole publication process. It does not either consider enough some of the most contentious issues in the field of scholarly publication, such as in particular the proxy role of citation indices for scientific excellence, in a context in which an ever-increasing number of scientific publications is produced but hardly ever cited or read.

The Belgian delegates to the ERA Standing Working Group on Open Science and Innovation (SWG OSI), chairmen of the Belgian CIS-CFS consultation group on Open Science, welcome and support PlanS. With regard to PlanS implementation, they support, in agreement with the Belgian CIS-CFS consultation group on Open Science, some particular points and also wish that some points be clarified or be added.

General recommendations for an implementation roadmap

¹ Bart Dumolyn (EWI), Eric Laureys (BELSPO) and Marc Vanholsbeeck (Ministry of Wallonia-Brussels Federation)

- ✓ **The Belgian delegation to SWG OSI, in agreement with the Belgian CIS-CFS consultation group on Open Science, stresses its support to**

1 - The establishment of a bibliodiversity principle/no-single-model principle.

Open science must entail support for a diversity of business and publishing models, including the use of Open Access repositories.

2 – Alternative business models requiring no APCs for publication, like “Diamond OA” journals, or fair Gold business models which do require APCs but where APCs are based on the range of services offered, kept at a moderate level and where possible even capped to the lowest level.

3 - A strengthened role for open access repositories.

Open archiving, without exclusive assignment of rights to publishers and without embargo, or with embargoes as short as possible, must be more explicitly mentioned as one of the solutions to be promoted or even preferred.

4 - The implementation of innovation support mechanisms for interoperable national and international infrastructures, university presses and editorial structures, content or referencing platforms, journals and services offering original editorial and business models which uphold open science and innovation.

5 - The application of principles of transparency and measurement of the costs of publication throughout the publication process. Implementation of a widely-agreed monitoring of the costs is necessary. Costs have to be tied to the actual costs involved and the range of services offered: this is a key point in the implementation and evolution of open access publishing mechanisms.

6 - Adequate monitoring and review process.

A review of PlanS should include socioeconomic consequences as well as PlanS impact on the stratification of scholarly publications and bibliodiversity (including the Open Access to grey literature and open educational resources).

7 - Rewards and incentives.

Adequate rewards and incentives should be provided, in particular through Open Science friendly research evaluation processes. The implementation of PlanS should be accompanied by the cOAlition S members’ signing of the San Francisco Declaration on Research Assessment (DORA) and the inclusion of DORA requirements in their policies.

- ✓ **The Belgian delegation to SWG OSI, in agreement with the Belgian CIS-CFS consultation group on Open Science, wishes the following points to be clarified or added**

1 - Taking disciplinary specificities into account.

Particular attention should be paid to the practices and conditions of scientific communication, publication and evaluation within the different disciplines, including local publication and book publishing in social sciences and humanities.

2 - Planning of a phased deployment.

Considering the amount of technical constraints imposed upon open repositories and in order to make sure that journals and repositories are submitted to equal constraints, we think it is necessary to adopt a phasing in the adoption of technical requirements in the implementation rules of Plan S vis-à-vis repositories. The current timeline may indeed exclude many publishing and archiving platforms which do not have the means to comply with the technical requirements at such short notice.

3 - On CC-BY and licensing.

Widespread distribution under CC-BY or CC-BY-SA open licenses should be preferred. CC-BY-NC licenses should only be acceptable for a short period, in order to leave sufficient time for the cOAlition S members to work with the publishers on establishing compliant amendment templates and agreements and to instruct researchers on the use of these amendments and open licenses.

4 - On support to open science infrastructures and associated services

Financial support from cOAlition S to the open science infrastructures, platforms and journals seems indispensable. The funder should have a dedicated budget line to support open access infrastructures.

This fund should support in priority OA infrastructures that ensure transparent governance, costs and management, scientific quality in accordance with research practices in the different disciplines as well as open standards and norms for data and metadata and the provision of open APIs.

Furthermore, financial support should be provided for established OA service providers such as DOAJ (DOAB), SHERPA/ROMEO, for compliance and monitoring purposes.

5 - Copyright legal framework

A balanced copyright legal framework should be made available throughout Europe to accommodate Open Access and its benefits, especially with regard to giving researchers a right to secondary publication, which is the deposit of full texts in OA repositories, without embargo or with embargoes as short as possible.

6 - Academic life.

Finally, Plan S should consider two points that directly relate to the daily routines of academic life but may hinder a smooth implementation of Plan S:

- the **legitimate interests** of researchers in disciplines in which prestigious journals may not

(yet) be Plan S compliant;

- the **complexity of scientific collaborations**: How do PlanS principles apply to publications with different authors' affiliations, with one or more funding organisations being cOAlition S members in a group of non-cOAlition S funders (or vice versa)?