

Plan S Feedback for CESAER from University College Dublin

We support the overall goals and intention of Plan S and have some questions, issues and comments below.

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

APC funding

The guidance document states that “cOAlition S members will ensure financial support for OA publishing via the prescribed routes to compliance.”

This is too vague - cOAlition S signatories should fund APCs and this should be clearly stated in the plan.

APC inflation

Is there a danger that Plan S will encourage publishers (including those of prestigious journals) to raise their APCs when they realise that a large volume of the research outputs must now be open access?

APC transparency

The implementation plan refers to the need for further study of APCs, and some such studies have begun to emerge independently. These are often limited to determining 'normal' APC charges. Any study commissioned by cOAlition-S should identify which publishing activities APCs are used for by the publishers as a further dimension of the expected transparency.

Licences

The document explains that authors will have to publish under a CC BY 4.0 or a CC BY-SA 4.0 licence. Is this overly restrictive, particularly in the Humanities and Social Sciences? Plan S should leave it to the author to recommend an appropriate open licence.

Institutional Repositories

The 'Guidance on the Implementation of Plan S' document seems at first to support the use of Open Access repositories and author self-archiving. It is very much in the interest of Coalition S to encourage the use of Green Open Access, given the higher impact of Green over Gold:

'Having a green copy of a paper is the most impactful research communication strategy overall and the best strategy in 19 fields [i.e. research disciplines] out of 22.

'Green is nearly always more effective than relying strictly on gold (20 out of 22 fields).'¹

However, several of the current requirements for Green OA repositories would be either too expensive or technically impossible for institutional repositories to comply with. We are far less well-resourced than commercial publishers yet Plan S states that repositories must apply 'the same quality criteria as Open Access journals and platforms'.

Plan S effectively prices institutional OA repositories out of the market, despite being more impactful than Gold OA for a fraction of the cost.

What Institutional Repositories (IRs) can do in terms of Plan S requirements:

- IRs can accept AAM in vast majority of cases
- IRs can accept VoR where journal/publisher's policy confirmed in advance
- Where there is a conflict between the funder's requirement and the publisher's policy, some IRs will side with the funder and uphold the embargo requirement, others will not
- Automated manuscript ingest facility, to an extent (bulk imports and upload via identifiers like DOI, ORCID)
- OpenAIRE compliance
- Version information in metadata, with a reasonable margin of error
- Funding codes in metadata, to a degree
- Open APIs
- Continuous availability

What IRs can't do:

- Enforce authors' copyright retention; little to no information is received on the copyright of individual items prior to publication and have no position in author/publisher negotiations
- Enforce SA portion of CC license (where end users must apply the same license to works that incorporate the originals)
- Store full text in XML. Papers are received by self-archiving authors usually in PDF or docx format
- Apply 'the same quality criteria as Open Access journals and platforms', including:
 - Deposition of content with a long-term archiving programme such as C/LOCKSS
 - Availability of full text in XML format (as above)
 - Inclusion of cited references in metadata

Many of the same challenges face non-STEM publishers and disciplinary repositories, including:

- Many publishers and publishing platforms (e.g., OJS) do not support JATS XML, and could not reasonably support the labour associated with markup of text in the format
- The Helpdesk requirement must be defined in a way that is both realistic and which serves the broad goals of the coalition, including the training and other supports that research performing organisations must provide to their research cohort to facilitate compliance

¹ Archambault et al., 2016. Research impact of paywalled versus open access papers.
<https://www.1science.com/1numbr/> accessed 2018-12-12.

- It is not useful to simply suggest that APIs be available to enable alternative dissemination of research content; specific mechanisms should be cited (e.g., sitemaps/ResourceSync; signposting; etc.)

Non-disclosure agreements (NDAs)

The implementation guidelines call explicitly for public posting of subscription agreements with publishers that have hitherto been typically subject to NDAs. This will be both challenging to implement in some jurisdictions but also add to the overhead costs involved in resource management.

Overhead costs of new documentation

It is implicit that new levels of documentation will need to be provided by publishers and OA repositories to demonstrate compliance with Plan S. These requirements add substantially to the overheads associated with Open Access and may represent new barriers to achieving the overall objectives of Open Science.

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

Compliance

How will the individual members of cOAlition S measure compliance? As it stands, Plan S does not include anything new in terms of monitoring and therefore enforcing compliance, either on a technical or policy basis. This has been a significant challenge in past OA mandates that has yet to be overcome. An unenforceable policy will only see a percentage of compliance.

Plan S compliance makes significant demands for investment in infrastructure and overheads by Open Access providers without any guarantee of a successful return on that investment, i.e. papers actually being made Open Access. A detailed technical plan and policy backing is a necessity for fostering full, immediate Open Access.

Research not funded by cOAlition S partners

Research funded by cOAlition S is just a small fraction of the entire research output. In Ireland for example, SFI funded approx. 9% of research outputs last year (from WoS). Only 45% of the SFI funded publications were Open Access. If there is to be a move to widescale Open Access publishing there would need to be more funders on board and incentives given to 'unfunded' researchers to publish in open access channels.

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