



cOAlition S

Accelerating the transition to full and immediate Open Access to scientific publications

Rationale for the Revisions Made to the Plan S Principles and Implementation Guidance

In Summary:

The revised Plan S maintains the fundamental principles

- No scholarly publication should be locked behind a paywall;
- Open Access should be immediate i.e., without embargoes;
- Full Open Access is implemented by the default use of a Creative Commons Attribution CC BY licence as per the Berlin Declaration¹;
- Funders commit to support Open Access publication fees at a reasonable level;
- Funders will not support publication in hybrid (or mirror/sister) journals unless they are part of a transformative arrangement with a clearly defined endpoint.

But a number of important changes are proposed in the implementation guidance

- In order to provide more time for researchers and publishers to adapt to the changes under Plan S, the timeline has been extended by one year to 2021;
- Transformative agreements will be supported until 2024;
- More options for transitional arrangements (transformative agreements, transformative model agreements, 'transformative journals') are supported;

¹ Berlin Declaration on Open Access to Knowledge in the Sciences and Humanities: <https://openaccess.mpg.de/Berlin-Declaration>

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- Greater clarity is provided about the various compliance routes: Plan S is NOT just about a publication fee model of Open Access publishing. cOAlition S supports a diversity of sustainability models for Open Access journals and platforms;
- More emphasis is put on changing the research reward and incentive system: cOAlition S funders explicitly commit to adapt the criteria by which they value researchers and scholarly output;
- The importance of transparency in Open Access publication fees is emphasised in order to inform the market and funders' potential standardisation and capping of payments of such fees;
- The technical requirements for Open Access repositories have been revised.

Since its launch in September 2018, Plan S has reinvigorated the global debate on Open Access to scholarly publications and the discussion on how to best achieve that goal. This is, in itself, a positive development. Having published draft guidance on implementation, we submitted the plan to public feedback – the largest ever international consultation that has been conducted on an Open Access policy. This open feedback process has sparked numerous discussions and open debates across Europe and beyond, at universities and within scholar communities, and at both regional and national levels. As a result, we received more than 600 feedback statements from universities, learned societies, publishers, scholarly associations, and individual scholars from more than 40 countries.

cOAlition S is grateful to all those who took the trouble to respond and to the many stakeholders who have provided specific advice, discussed important Open Access issues on social media, or otherwise provided inputs on Plan S.

The weight of the comments encouraged us to go back and refine the way that the over-arching principles were expressed, as well as helping to revise the guidance on implementation. The wider feedback received has helped inform cOAlition S members on issues of communication and potential interventions that might be pursued to support of the aims of Plan S and achieve full and immediate Open Access.

We would like to acknowledge the work being done by many other partners on the transition to full and immediate Open Access. We particularly value the work done by OA2020² and the leadership in Europe from the European Universities Association (EUA),³ the League of European Research Universities (LERU),⁴ The Guild of European Research-Intensive Universities,⁵ and All European Academies (ALLEA).⁶ We intend to continue working with those who, across the world, have displayed leadership over many years in pursuing the goal we also espouse. Further work on standards for Open Access will be in partnership with many others including the Directory of Open Access Journals (DOAJ),⁷ Open Directory of Open Access Repositories (OpenDOAR),⁸ SHERPA/RoMEO,⁹ Committee on Publication Ethics (COPE),¹⁰ and the Efficiency and Standards for Article Charges (ESAC) initiative.¹¹

² <https://oa2020.org/>

³ <https://eua.eu/>

⁴ <https://www.leru.org/>

⁵ <https://www.the-guild.eu/>

⁶ <https://www.allea.org/>

⁷ <https://doaj.org/>

⁸ <http://v2.sherpa.ac.uk/opensoar/>

⁹ <http://sherpa.mimas.ac.uk/romeo/index.php>

¹⁰ <https://publicationethics.org/>

¹¹ <https://esac-initiative.org/>

In May 2019 cOAlition S launched the 'São Paulo Statement on Open Access'¹² with the African Open Science Platform,¹³ AmeliCA,¹⁴ OA2020, and SciELO.¹⁵ While we are formally a coalition of research and innovation funders, we welcome collaboration from further partners and supporters who share our goals for Open Access. We have particularly taken at heart the issues regarding the impact of Plan S on careers for younger scholars and are grateful that the largest pan-European associations representing early career researchers (such as the European Council of Doctoral Candidates and Junior Researchers (Eurodoc),¹⁶ Global Young Academy (GYA),¹⁷ Marie Curie Alumni Association (MCAA),¹⁸ and Young Academy of Europe (YAE)¹⁹) have engaged in a positive dialogue with us. Their engagement has provided a basis for further structured engagement and we hope to extend that to other groups who want to assist us in the pursuit of full and immediate Open Access.

Our Objective

The feedback received has shown that the overall goal of achieving full and immediate Open Access is widely supported by those who responded. **The overall objective of Plan S has thus not been challenged.**

What is Full and Immediate Open Access?

Many respondents identify as supporters of Open Access but it is clear from their comments that their definition is satisfied by delayed or partial Open Access. We reiterate our view that delayed access, or that which does not give licenses for wide re-use, is not full and immediate Open Access. Our support via a subscription route (see below) requires the content to be made freely available at the point of publication either in the form of the Author-Accepted Manuscript (AAM) or Version of Record (VoR), as indeed is already the practice of some publishers.

Timelines

The draft implementation guidance stated that 1 January 2020 was our starting point and we foresaw a transition period which would begin at a point chosen by funders based on calls or grants issued after that date, at their discretion. In recognition of the commitment we have seen across the scholarly publishing system to make this transition a success we have decided to provide a further year in which that commitment can be converted into compliant routes to Open Access publication.

The formal commencement point for our mandates and transition period will be 1 January 2021. This timetable provides more time for researchers, institutions, publishers, and repositories to adjust to the required changes and for funders' policies to develop and take effect. In addition, we will provide for

¹² <https://www.coalition-s.org/sao-paulo-statement-on-open-access>

¹³ <http://africanopenscience.org.za/>

¹⁴ <http://www.amelica.org/en/>

¹⁵ <https://www.scielo.org/>

¹⁶ <http://eurodoc.net/>

¹⁷ <https://globalyoungacademy.net/>

¹⁸ <https://www.mariecuriealumni.eu/>

¹⁹ <http://yacadeuro.org/>

arrangements that allow for a smooth transition of existing publishers and journals to full and immediate Open Access under specified conditions until 2024.

In summary, we are committed to fulfil the specific objective set out in Plan S. At the latest in calls published as of 1 January 2021, or earlier at individual members' choice, publications resulting from research funded by cOAlition S members grants must be published in Open Access venues (journals and platforms) or made available in an Open Access repository.

Before the end of 2024 cOAlition S will conclude a formal review process that examines the modalities and effects of Plan S.

Routes to Full and Immediate Open Access

cOAlition S members have noted that different communities, disciplines, regions, countries, and stakeholder groups can hold different views on the best route to achieve full and immediate Open Access. The differing views, including amongst longstanding proponents of Open Access, reinforce our view that we must, as funders, provide support for a range of paths to full and immediate Open Access. Plan S will build on the long-established practice of developing Open Access through funder mandates which provide several routes towards full and immediate Open Access so that those who contract, often universities or research organisations or their consortia, may determine which route they wish to follow to achieve full and immediate Open Access.

We offer a clear route for those who wish to work within a subscription model, by utilising deposit of the AAM or VoR in a repository as already mentioned.

We support a clear route for consortia and communities who wish to move away from existing subscription agreements through transformative arrangements. These transitional arrangements include transformative agreements of a kind now being implemented, model agreements to support change, and 'transformative journals' in a new form.

The coalition has been impressed by the significant move from university consortia and research institutions, often by those who have signed the OA2020 Expression of Interest, to establish publisher level transformative agreements. Many countries and consortia of research institutions are taking the route of transformative agreements and are either cancelling subscription contracts or signing read-and-publish or publish-and-read agreements with publishers. These agreements transform today's scholarly journals from subscription to Open Access publishing in accordance with community-specific publication preferences.²⁰ Many of these are registered on the ESAC website. We are not sure that there is widespread recognition of this development and look forward to greater publicity for the deals that convert resources currently spent on journal subscriptions into funds to support sustainable Open Access models. By moving to such agreements without author-facing publication fees we hope that concerns about an undue focus on one of our routes to full and immediate Open Access will be addressed.

Plan S is open to other forms of transformative arrangement which take forward other models of transformation which may be better suited to some publishers, or initiated by publishers as part of their support for a time-bound move to full and immediate Open Access.

²⁰ <https://oa2020.org/mission/>

Accordingly, we continue to support three routes to Plan S compliance:

1. Open Access publishing venues (journals or platforms);
2. Subscription venues (repository²¹ route);
3. Transition of subscription venues (transformative arrangements).

cOAlition S funders will financially support publication fees for Open Access publishing venues and will collectively establish incentives for establishing Open Access journals or platforms. At the discretion of our members, funding may be provided for transformative arrangements.

Some respondents considered that we had given insufficient attention to routes such as Diamond Open Access or various forms of innovative Open Access platforms. We reiterate our support for those models as well-established delivery mechanisms for full and immediate Open Access. Any lack of emphasis was a result of an assumption that these required less attention as they are already a clearly successful element of the transition and aligned with Plan S. Many funders already provide support for Diamond Open Access and will continue to do so. We will consider further support where needed in the context of the collective support we announced.

Access for Researchers

Some respondents were concerned that grantees from cOAlition S members would be disadvantaged by the mandates of our members, in particular with regard to publishing in high impact venues which are not aligned with Plan S requirements and in collaboration with researchers from non-cOAlition S members. We note that our geographical reach is growing as more funders join the coalition and our mandates are largely aligned with the OA2020 initiatives which are, as noted above, taking hold in many countries. We are confident that the three routes should provide researchers with sufficient options to publish in a wide variety of venues.

We welcome the statements of support from funders in many countries and invite those who support us but are not formal members to indeed formally join the coalition so that they can actively contribute to the governance and direction of Plan S. In this document, we have attempted to address the most important comments from the consultation. We also hope that the revised guidance will demonstrate our commitment to the establishment of full Open Access publishing options for all researchers.

Some respondents expressed concerns that Plan S focuses too much on a publishing charge model of Open Access and that this will lead to an increase in such venues and an increase in existing publishing charges. The respondents suggest that this would make it more difficult for unfunded researchers to identify publishing options. We are currently developing guidelines for discounting and waiving publication charges for researchers from middle-income and low-income countries.²² We look forward to further discussion about the appropriate use of waivers and whether that may be a fair and reasonable charge against publishing costs so that unfunded researchers receive support.

The coalition has noted academic editorial board led-flipping through changing publishers/service providers. We commend all those who aspire to full and immediate Open Access models and will build on the experience of some coalition members who have explicitly supported such activity as a natural path to our objective.

²¹ <https://scholarlycommunications.jiscinvolve.org/wp/2016/05/31/what-is-a-repository/>

²² According to the 'World Bank Country and Lending Groups' classification:

<https://datahelpdesk.worldbank.org/knowledgebase/articles/906519-world-bank-country-and-lending-groups>

Preprints

We note the feedback from those who support Open Access but consider that it is sufficient to have access to preprints of material which have not yet been peer-reviewed. We repeat that we welcome the sharing of preprints but we strongly agree with comments by respondents that the process of peer review is a significant addition of value to scholarly publication. We believe in Open Access to publications that carry the full weight of scholarly peer-review, whether that be in the form of the AAM or VoR.

Quality

cOAlition S has repeatedly stated that we will not compromise on quality. We emphasise our commitment to strong peer review systems alongside other forms of quality assurance. We look forward to working with partners so that journals with strong quality assurance systems are recognised and supported. We disagree fundamentally with the notion that Open Access publishing is associated with lower quality. We welcome the work done by COPE on developing appropriate quality criteria for journals and look forward to further discussions engaging those who carry out research, editing, and review processes to strengthen our quality assurance systems.

Copyright

The responses we received have reinforced our view that copyright should remain with the author or their institution, with the work done by the publisher recognised for the services which they provide. In this we recognise the work done by initiatives such as the Harvard Individual Open Access licence²³ or, in the UK, with the UKSCL Model Institutional Open Access Policy.²⁴ We will develop similar mechanisms to ensure that no author needs to negotiate individually with publishers the right to make an article Open Access. Beyond that, we believe that a wider adoption of rights retention approaches, at the institutional level and even at the level of national laws, is called for.

Licences

We consider that a CC BY licence is appropriate and encourages the work we fund to be taken forward for critique and reuse as broadly as possible. There are compelling reasons why we do not accept the more restrictive CC BY-ND and CC BY-NC options to be Plan S compliant. One is the reuse of scholarly publications for educational purposes. Another is that we wish to allow and enable large-scale content mining of scholar outputs by modern technology (such as machine-reading), including for commercial uses (e.g., pharmaceutical companies mining scholar papers in their endeavour to develop new drugs or vaccines or support for digital humanities methods). We strongly believe in the utility and potential for innovation based on results of publicly funded research, and we will not accept a Non-Commercial restriction on the re-use of research results.

If changes are made when re-using licensed material, the CC BY license demands that such changes be clearly indicated. cOAlition S members do recognise that that there is a tradition of creative scholarly works for

²³ <https://osc.hul.harvard.edu/policies/ioal/>

²⁴ <https://ukscl.ac.uk/>

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which adaption and modification raise important issues of rights and responsibilities. We also recognise that misrepresentation of contentious work is an issue that requires increased safeguards and community standards. As an interim measure to address the concerns, particularly expressed by HSS communities, we recommend that funders should be willing to consider an exemption from the requirement for a CC BY license to allow the use of CC BY-ND on a case-by-case basis.

Hybrid Journals and Transformative Arrangements

Some respondents made a case that we should reconsider our view that, over several years, hybrid journals have not succeeded in delivering full and immediate Open Access at reasonable cost. We commend transformative agreements under 'Routes to Full and Immediate Open Access' above. However we have yet to see evidence which refutes our view that, outside transformative agreements, hybrid journals have not delivered timely full and immediate Open Access.

Where no overarching transformative arrangement applies, cOAlition S will also consider a potential framework for individual 'transformative journals' where the share of Open Access content is gradually increased, where subscription costs are offset by income from payments for publishing services (to avoid double payments), and where the journal has a clear commitment to transition to full Open Access in an agreed timeframe. We would expect the publisher to commit to key performance indicators which demonstrate the transition to full and immediate Open Access. In this way publishers would allow our grantees to continue to publish compliantly in those journals during the transition period.

Our position is that we will not fund Open Access publication charges in hybrid journals outside of transformative arrangements as described here. We reiterate that researchers who publish in subscription journals can establish compliance by repository deposit without embargo.

Costs

Plan S is primarily about delivering full and immediate Open Access with appropriate reuse rights. However, we recognise the view of those who responded that the scholarly dissemination system is under extreme stress and many respondents have been unable to gain access to the full set of material they need due to cost constraints.

Some respondents were concerned about the costs involved in a move to full and immediate Open Access. We commend those transformative agreements which, in many countries, have been established at marginal or no additional cost, and call for full transparency on transformative agreements. This and the enthusiasm of university consortia and others in several countries to strike cost-effective agreements with publishers, along with the deployment of embargo-free access to subscription journals, indicates to us that cost need not be a major obstacle to Open Access. We also note that a number of initiatives are exploring and modelling the distribution of costs to multiple stakeholders and will follow this work with interest for its implications for the details of Plan S implementation by member funders.

It remains our view, as set out previously in our guidance on implementation, that transparency about costs should inform the negotiations between publishers and research organisations, universities, and funders. As funders it is our aim to ensure cost-effectiveness in the research funding system so that public spending on research is financially and morally justifiable. We reiterate our desire for such transparency and our willingness, if necessary, to consider cost controls in our grant award processes (by imposing caps on our funding of charges for publication services). If publication fees are levied, these should be commensurate with the publication services delivered. Meanwhile we will be taking forward our intention to establish on-

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going monitoring to maintain transparency and a clear understanding of costs and prices. We may at later time decide to implement publishing costs caps in a coordinated way if unreasonable levels are observed.

Role of Repositories

Reflecting a substantial body of feedback, the role of repositories has been clarified to offer more than just the preservation of scholarly publications. cOAlition S strongly encourages researchers to deposit their publications in a repository, irrespective of the chosen route to compliance. The deposition of the AAM or VoR without an embargo in repositories is one route to compliance, and forms the only route to compliance for publications in subscription journals that are not under transformative agreements. We have taken notice of the feedback stating that some of the technical requirements we proposed for repositories (including a mandatory requirement for JATS/XML) may have been too ambitious and accordingly adjusted our requirements as indicated in 'Part III Technical Guidance and Requirements' of the implementation guidance. It remains our intention that the technical requirements we describe should underpin a route towards a new generation of repository platforms.

Learned Societies

Many respondents drew attention to the particular position of Learned Societies. The coalition members view Learned Societies as an essential component of the scholarly infrastructure, although we recognise that there are many different sustainability models in different types and sizes of Learned Societies. We are pleased that the project commissioned by Wellcome, UK Research and Innovation, and the Professional Society Publishers (ALPSP),²⁵ to support learned society publishers to transition to Open Access and align with Plan S, is identifying many different models which would support Societies' transition to full and immediate Open Access. We commit to working further on the practical aspects of supporting such a transition. In particular, we plan to work with OA2020 and the ESAC community to make sure that smaller Learned Societies are able to engage in transformative agreements by supporting the establishment of model contracts. We recognise the issues which are being raised around transitional risk and look forward to exploring this further with Learned Societies.

The Need to Review Assessment Systems

Many respondents, notably early-career researchers, drew our attention to the importance of revising the various assessment systems used by institutions, funders, and governments. In the new version of the guidance, we have been clearer about our commitment to the San Francisco Declaration on Research Assessment (DORA),²⁶ or similar initiatives such as the Leiden Manifesto,²⁷ and commit to working with partners, including the current initiative of the National Academies of Science in the United States.²⁸ We think that it is essential for all parties to work together, and contemporaneously, on this issue. We also note the importance to early-career researchers that employing institutions commit to revise their procedures and take that forward to implementation in the transition of Plan S.

²⁵ <http://www.informationpower.co.uk/consultation/>

²⁶ <https://sfdora.org/>

²⁷ <http://www.leidenmanifesto.org/>

²⁸ <https://www8.nationalacademies.org/pa/projectview.aspx?key=51293>

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A number of respondents asked us to be clearer about the context of Open Access in the broader move to various elements of Open Science. The coalition partners are enthusiastic about many aspects of Open Science, including Open and FAIR Data, and see the Plan S initiative as a significant element in encouraging Open Science. We look forward to working further with many partners in the research and innovation ecosystem to build on what we are doing. We note and value the articulation in 'Open Science by Design.'²⁹ We look forward to supporting an agenda that should be led by researchers, institutions, funders, and governments together to deliver value from research and innovation for citizens of all countries.

Supporting a Range of Routes for Different Disciplines

cOAlition S is sensitive to disciplinary differences and their different publication cultures. We acknowledge that there may be scholarly fields where Open Access is less well developed. We reiterate our commitment to collectively support Open Access infrastructures in those field that may lack high quality Open Access venues. We are conducting an analysis (the 'gap' analysis) of the capacity of publishing systems in different disciplines. This will identify areas that need support, specific local issues that need addressing, and existing areas of exemplary practice. We believe the different routes to compliance with Plan S provides enough flexibility to cater for Open Access options across all scholarly fields. We firmly believe that the principle of full and immediate Open Access is of universal value and applies to all scholarly disciplines.

We acknowledge that monographs and books are an important part of the scholarly communication in SSH research and consider that broader discussion is necessary about specific issues relating to this area. The current guidance therefore does not apply to books (including book chapters) and monographs. cOAlition S will, by the end of 2021, issue a statement on Plan S principles as they apply to monographs and book chapters, together with related implementation guidance.

Critical Mass

Many respondents have noted that although cOAlition S has attracted new members from different parts of the world, it still represents a relatively modest portion of the global research output. We acknowledge that in order to successfully bring about the transition to full and immediate Open Access, the coalition should grow and also work with partners who share our aims. Some of the changes in the current guidance, and the reframing of the principles, have been proposed to address issues raised by funders that have not yet signed up to join the coalition.

Within just a few months since the publication of Plan S the number of funders that have joined has already doubled and cOAlition S has become a global initiative, with funders from other continents joining and expressing strong support. We look forward to more funders, both inside and outside of Europe, supporting the transition to full and immediate Open Access by joining and aligning with cOAlition S.

²⁹ <https://www.nap.edu/catalog/25116/open-science-by-design-realizing-a-vision-for-21st-century>

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