

# CONUL Response to Guidance on the Implementation of Plan S

[CONUL](#), the Consortium of National and University Libraries in Ireland, welcomes the aims of Plan S and ambition of cOAlition S to make publicly funded research publications fully and immediately available via Open Access.

Plan S advocates for Open Access via publication but available and transparent funding needs to be made evident. It will also need careful oversight and monitoring to avoid exploitation of this funding.

Irish research performing organisations in adherence with national policies have predominantly supported the transformation of scholarly communications to an Open Access environment through Open Access repositories. Repositories currently cannot meet Plan S requirements without external financial investment which is unfortunate given the role repositories currently play in the dissemination of research.

The end point of Plan S has been envisioned and it is a commendable position to make all research publications available Open Access. More attention and guidance, however, is required during the transition period for researchers. Researchers are being advised by their institutions to publish in top ranking mainly hybrid journals on the one hand and are being required to publish Open Access by their funder on the other. There is a conflict here for researchers which needs to be surmounted in the short term.

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

### Funding of Open Access Publishing

- i. 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 in a manner agreed with stakeholders and this should be clearly stated in the plan. There is some concern that if, for example SFI, directly funded their grantees only, that this would further enrich well funded areas with no plan for less well funded areas. Publication costs should be allocated a budget line in grant funding.
- ii. There is a risk that Plan S will encourage publishers (including those of prestigious journals) to raise APCs when they realise that a large volume of the research outputs must now be Open Access. Thus, capping of APCs is an important element of the implementation plan but there are clear challenges around implementing it. It is not clear how inflation of these or the cost of transformative agreements will be controlled over time.
- iii. Transparency is an important element. In recent years, it has been a challenge for libraries and research institutions to adequately fund serials budgets as they increase beyond acceptable

levels. Transformative agreements must constrain costs, and details of cost and the terms of agreements should be publicly available.

- iv. 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.
- v. For transformative agreements to comply with Plan S, negotiations need to be concluded before the end of 2021, and therefore collaboration and a united approach to future negotiating are essential from all consortia, libraries, research performing institutions and funders. This will require coordination and communication across Ireland and Europe.

### Timeline for transformation and plan for transition

- vi. The timeline proposed by the guidance implementation does not offer clear guidelines for stakeholders "...members should, at the very least, implement the new requirements in all calls issued after 1 January 2020". This doesn't take into account consultation and communication plans with researchers, libraries negotiating with publishers, design of transformative agreements, registration of journals with DOAJ, transitioning work flows, new technical developments being deployed etc.
- vii. Libraries and library consortia all over Europe negotiate deals with publishers which are generally multiannual in length to achieve best deals and this will be the case during the transition period to transformative deals. Many of these big deals already in place will run over the 2020 starting point of Plan S.

### Academic Freedom and STEM bias

- viii. Plan S has a strong bias to publication practices in the Science, Technology, Engineering and Medical areas. It does not account fully for other disciplines. Additionally by advocating publishing in non-hybrid journals, it is not clear yet how researchers can fulfil expectations from their home institutions to publish in high ranking journals (which are generally hybrid) and requirements from their funders to publish in Open Access journals.
- ix. The document explains that authors will have to publish under a CC BY 4.0 or a CC BY-SA 4.0 licence. This is overly restrictive, particularly in the Humanities and Social Sciences, where publications can often be creative or artistic in nature. Plan S should leave it to the author to recommend an appropriate open licence.

### Institutional Repositories

- x. 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 repositories, given the higher impact of publications archived in repositories (green) over articles from subscription journals:

*'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).'*<sup>1</sup>

However, several of the current requirements for Open Access repositories would be either too expensive or technically impossible for institutional repositories to comply with e.g. automated ingest facility, full text stored in XML in JATS standard, deposition of content with a long-term archiving programme such as C/LOCKSS, inclusion of cited references in metadata . These repositories 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 the evidence that these are more impactful than publishing in hybrid journals.

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

### Compliance

- xi. 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.
- xii. cOAlition S members should look to institutions, organisations and countries who have developed and adopted successful Open Access monitoring programmes.
- xiii. We recommend that cOAlition S should engage with libraries/librarians in developing infrastructure and alternative publishing models.
- xiv. In many of the feedback sessions organised as part of the consultation process the concerns of small/micro publishers have been raised. On the basis that the most benefit will be derived from making progress with the larger publishers cOAlition S might consider an exemption/derogation for publishers with turnover under a certain level for an extended period of time to allow for the initial focus to be on the larger publishers.

### Research not funded by cOAlition S partners

- xv. 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 wide scale Open Access publishing there would need to be more funders on board and support or incentives given to 'unfunded' researchers to publish in Open Access channels. Otherwise this will result in a two tier system for the funded and unfunded. It also causes confusion for researchers as to the best publication routes.

*Prepared by the CONUL Research Group on behalf of CONUL. Ratified: 30 Jan. 2019*

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