On 31 May 2019, the authors of “Plan S”, a group of international funders that form “cOAlition S”, published their revised implementation guidelines. The “Plan S” initiative aims to boost Open Access in scholarly publishing by 2021. The European University Association (EUA) welcomes the reviewed guidelines, which address the main points raised by the Association during a broad consultation process.

EUA welcomes the greater clarity on the fundamental principles of “Plan S” and the accompanying publication of the rationale supporting the revisions. EUA would like to thank the members of “cOAlition S” for its efforts in reviewing the guidelines and to express its particular support for the following elements of “Plan S” as part of the transition to Open Science:

- **Open licenses and retention of copyright** by authors or institutions, requiring a Creative Commons Attribution (CC-BY) license as default, but clearly allowing exceptions for specific publications.

- **Valuing the intrinsic merit of research output** in research assessment approaches, rather than relying on the publication impact factor as a proxy indicator. While “cOAlition S” members will primarily follow the guidelines found in the San Francisco Declaration on Research Assessment (DORA), EUA welcomes that the new implementation guidance supports universities’ freedom to explore new evaluation methods by explicitly mentioning alternative guidelines, such as the Leiden Manifesto. In this regard, EUA and Science Europe are **joining efforts to improve scholarly research assessment methodologies** to facilitate the transition to Open Science.

- **Seeking cooperation with stakeholders**, in particular with EUA and other leading international initiatives in the field of Open Access such as the Directory of Open Access Journals (DOAJ), Directory of Open Access Repositories (OpenDOAR), SHERPA/RoMEO (a service showing the copyright and Open Access self-archiving policies of academic journals), Open Access 2020 (OA2020) led by the Max Planck Digital Library, and Efficiency and Standards for Article Charges (ESAC).

- **A diverse range of publishing venues** ranging from journals and repositories to Open Access publishing platforms. EUA calls upon scholarly publishers to support the immediate deposit of Version of Record (VoR)/Author Accepted Manuscript (AAM) documents in repositories.

- **Support to “transformative agreements”**, contracts with large publishing editors for which EUA strongly recommends developing community standards. EUA, through its seminal analyses of “Big Deals” with scholarly publishers and its upcoming report on “Publish & Read agreements”, is prepared to work together with “cOAlition S”, OA2020 and ESAC to support and monitor the development of transformative agreements. For greater clarity in implementation, EUA calls on funders to further clarify conditions under which publications in “hybrid” venues are compliant with “Plan S”.

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- The relaxation of mandatory technical requirements for repositories, journals and platforms.

- An extended timeline to allow researchers, universities and consortia to better prepare to the requirements and to develop agreements with scholarly publishers and other mechanisms to enable publications in compliant venues by 2021. EUA calls on individual funders, particularly the earlier “Plan S” signatories, to work together with national stakeholders in this process to ensure a smooth transition during 2020.

- The development of a review procedure before the end of 2024. EUA recommends that the impact of transformative agreements, including the systemic cost of scholarly publishing, should be included in the review; as should the implementation of merit-based assessment practices.

To summarise, EUA continues to support “Plan S” and welcomes the greater clarity provided by “cOAlition S” on the new implementation guidelines. The Association is very pleased to see that the revised guidelines address the main points raised during the consultation process, in particular the additional principle on addressing the way research is assessed, as EUA sees this as one of the key factors promoting the evolution towards an effective Open Science system.

EUA provided support to the first version of “Plan S” principles (September 2018), but nevertheless raised several points of concern (February 2019) in response to the first version of the guidelines (November 2018). These emerged out of strategic discussions with the national rectors’ conferences, which are EUA members, and the national research funding organisations in “cOAlition S” through Science Europe. Technical discussions have also been held between the EUA Expert Group on Science 2.0/Open Science and the “cOAlition S” Task Force.

EUA looks forward to continuing its strategic and technical dialogue on the implementation process of “Plan S” on behalf of and with its member universities. EUA brings together key elements of the transition to Open Science in close dialogue with its members. These include providing greater transparency of costs and conditions, developing Open Science policies, investing in research infrastructures and revisiting research assessment approaches. EUA engages in dialogue on these elements at the system level with individual universities, national rectors’ conferences, other research performing organisations, research funders and policymakers.