

POSITION

Turning principles into practice EUA's response to the Plan S Implementation Guidance

February 2019

In September 2018, Coalition S, a group of research funding organisations coordinated by Science Europe, announced the intention to mandate that “after 1 January 2020 scientific publications on the results from research funded by public grants provided by national and European research councils and funding bodies, must be published in compliant Open Access Journals or on compliant Open Access Platforms.”¹

The announcement, known as “Plan S”, is a response to the May 2016 call of the European Council to “promote the mainstreaming of open access to scientific publications by continuing to support a transition to immediate open access as the default by 2020.”² The European University Association (EUA) endorsed the [Amsterdam Call for Action in Open Science](#), a foundation of the European Council’s decision, and works intensely towards the transition to Open Access.³

Consequently, EUA already [expressed its support for the objectives of Plan S](#) while emphasising that its realisation will depend on turning principles into practice. Universities in the EU28 host close to 750 000 researchers (2017) and spend over one billion euros annually for access to scholarly literature.⁴ Plan S will inevitably have an impact on universities and university researchers.

EUA therefore welcomes the publication and feedback process on the Implementation Guidance. It offers an opportunity for further dialogue before the implementation in the funding programmes of Coalition S. EUA also acknowledges concerns expressed by researchers and research institutions, for instance on the impact on research assessment or potentially increasing publication costs, for which Plan S needs to provide answers.

EUA continues to offer a platform for dialogue for the implementation of Plan S and highly appreciates the regular interactions between the EUA Council, Science Europe, and Coalition S.

In general, EUA supports the principles of Plan S while recommending flexibility in approaches to their implementation. This is to ensure compatibility with national or institutional policies and diversity of needs in different disciplinary practices.

EUA recommends that specific provision of the principles, explanations in the Implementation Guidance and default requirements should be further explained and, where necessary, be modified, as explained below in more detail.

Copyright

Regarding retention of copyright by the authors, the recommendation to use a license that allows free re-use, sharing and adaption of research outcomes (such as the CC BY Attribution 4.0 model license) is welcome, as the main objective is to free the copyright for authors/research institutions from publishers’ copyright. However, some publications may require exceptions, for instance where third-party rights are concerned. *EUA asks Coalition S to clarify the Implementation Guidance for such cases.*

Research assessment

Current research assessment approaches do not yet incentivise or reward publishing in Open Access journals. Instead, the so-called “prestige” of journals and the venue of publication is often a more decisive factor in evaluations. Consequently, prevailing assessment practices need to be reformed.⁵ Plan S suggests alignment with the [San Francisco Declaration on Research Assessment \(DORA\)](#), which recommends moving away from journal-level metrics. While this is welcome, *Plan S should specify that DORA is only one of several available pathways to reform research assessment at universities.* University freedom to explore new and innovative evaluation approaches tailored to their diverse needs must not only be ensured, but actively promoted.

EUA notes positively the intention of Coalition S to apply the DORA criteria as its preferred pathway for evaluations in funding programmes. While still needing to safeguard universities’ freedom to make their own choices, the decision of Coalition S to move away from journal-level metrics and to evaluate research on its own merits is welcome.⁶ *EUA offers to collaborate with Coalition S on ways forward to reform research assessment, in line with the [EUA Roadmap on Research Assessment in the Transition to Open Science \(2018\)](#).*

Routes to compliance

EUA welcomes the Implementation Guidance’s clarification on the routes to compliance via Open Access journals or Open Access platforms, deposition of scholarly articles in Open Access repositories, and transformative agreements. As it has been demonstrated by others, this offers a set of different routes to publish in compliance with Plan S requirements.⁷

EUA urges Coalition S to develop further guidance on books and monographs in a timely fashion and to engage in a dialogue with

relevant stakeholders, such as learned societies in scientific domains where books and monographs are more common.

Cost control

EUA lauds the intention of Plan S to increase the transparency of publication costs and subscription prices. Rising costs for access to scholarly publications are a major concern for European universities, which bear the brunt of expenditures for big deal-type subscription agreements. Furthermore, the costs of a new system with full Open Access need to be financially sustainable.⁸

For EUA, concerns remain about some specific implications of the compliance routes:

- Article Processing Charges (APCs) should not be the only mechanism to implement Gold Open Access as there is a risk of increasing publication prices even if a cap on individual APC fees is set.
- Transparent and transformative agreements with publishers, replacing current subscription agreement and big deals, are stipulated as an additional route to ensure compliance. There is, however, no single blueprint of what constitutes a transformative agreement, nor a specification in the Implementation Guidance. The announced collaboration with the [Efficiency and Standards for Article Charges \(ESAC\)](#) initiative is therefore highly appreciated. Based on its collaboration with universities, national rectors' conferences and negotiating consortia, *EUA is ready to cooperate with Coalition S to specify the nature and features of compliant transformative agreements.*

Repositories

To facilitate Green Open Access through depositing research outputs in repositories, flexibility on infrastructure and interoperability requirements need to be allowed to be coherent with existing national or institutional policies. *EUA refers to the input provided by the Coalition of Open Access Repositories (COAR) on this topic.*

Publishing innovation

The Implementation Guidance mentions the intention to support the creation of new "Open Access journals, platforms, and infrastructures"

and "acknowledges the importance of a diversity of models and non-APC based outlets." This is a highly welcome intention to create a more diverse, competitive and efficient scholarly communication system. Individual funders in Coalition S already support Open Access journals, books and platforms with dedicated funding, which can serve as blueprints and good practices. Given the timeframe for implementation, *EUA recommends advancing such actions as soon as possible in order to provide alternative publishing venues* already during the ramp-up and transition phase of Plan S.⁹

Regarding the possible impact on learned societies and small publishers, EUA takes note of concerns about the immediate effects of Plan S and lauds the efforts of Coalition S in supporting learned societies in identifying viable business models to fulfil their important function within the scientific community in compliance with Plan S.¹⁰

Global scope

Besides research assessment, the unclear impact of Plan S on international research publications and researcher mobility have emerged as a major point of concern, as researchers may face inconsistent policies for publication in international contexts. The most logical remedy is to align more funding policies with Plan S. Therefore, to avoid a fragmentation of policies and, in turn to ensure the intended large-scale impact of Plan S, *EUA recommends that Coalition S should engage additional research funding organisations in Europe and worldwide to sign and implement Plan S* – or to follow similar policies.

Conclusion

Following the publication of the Plan S Implementation Guidance, *EUA reiterates its supports for Plan S, and its vision to accelerate the transition to full Open Access*, even if more details on Plan S will still need to be fleshed out in the future. EUA is looking forward to a renewed version of the Implementation Guidance and is encouraging more research funders to sign or follow Plan S. On behalf of its members in national rectors' conferences and universities, *EUA offers to continue the dialogue with research funding organisations on the implementation of Plan S.*

Endnotes

- 1 <https://www.coalition-s.org/10-principles/>
- 2 Council of the European Union (2016) *The transition towards an Open Science system - Council conclusions.*
- 3 Plan S is in line with the EUA recommendations in its *Statement on Open Science to EU Institutions and National Governments (2017)* and *Towards Full Open Access in 2020 (2017)*.
- 4 See EUA (2019) *Second Big Deals survey: Preview of the results and Eurostat (2019) Total researchers by sectors of performance - full time equivalent.*
- 5 See for instance European Commission (2018) *Open Science Policy Platform Recommendations* and European Commission (2018) *Turning FAIR into Reality.*
- 6 Note also the pivotal role given to research funding organisations in European Commission (2019) *Future of scholarly publishing and scholarly communication: Report of the Expert Group to the European Commission.*
- 7 <https://101innovations.wordpress.com/2018/11/30/nine-routes-towards-plan-s-compliance/>
- 8 For the role of universities in big deal-type subscription agreements, see EUA (2018) *EUA Big Deals Survey Report - The First Mapping of Major Scientific Publishing Contracts in Europe.*
- 9 Coalition S should also consider supporting parts of the infrastructure and services on which Plan S, according to the Guidance document, would rely on – and would increase demand for – as stressed in European Commission (2019) *Future of scholarly publishing and scholarly communication: Report of the Expert Group to the European Commission*: "Research funders should [...] Develop funding mechanisms to support the development of open, interconnected and distributed scholarly publication infrastructures, and for their maintenance over the long term" (p. 9).
- 10 See <https://wellcome.ac.uk/sites/default/files/learned-societies-consultancy-request-for-proposals.pdf>