Joint response to Plan S Implementation Guidelines

By the Council of Australian University Librarians (CAUL) &
the Australasian Open Access Strategy Group (AOASG)
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Summary

This is a joint response prepared by the Australasian Open Access Strategy Group (AOASG - a coalition supported by 17 universities in Australia and eight in New Zealand) and the Council of Australian University Librarians (CAUL), the peak leadership organisation for 39 university librarians in Australia, following consultation with their Executive Committees and members. The response presents the views of those consulted but should not be considered to be a specific endorsement by any one particular member.

Broadly we support the intent of Plan S, however in summary we believe that the implementation guidelines[1] need to pay particular attention to the following issues:

- More thought needs to be given to repository based Green open access and its place as a viable route to Plan S compliance;

- More consideration should be given to the infrastructure needs and costs required for OA publishing envisaged by Plan S along with its potential impacts especially on early career researchers and developing countries;

- Now that Plan S is being adopted, there is a need for continued global consultation on the implementation through a formal mechanism.

These issues and related topics are discussed in this response.

Introduction

Neither Australia nor New Zealand has an overarching national Open Access (OA) policy. The two major funders in Australia, the Australian Research Council (ARC)[2] and National Health and Medical Research Council (NHMRC)[3], each have an open access policy which are primarily repository-based approaches. There are no funders in New Zealand with specific OA policies. The Australian funder OA policies are not identical but in short both require that research outputs arising from funded research must be made openly accessible within a twelve month period from the publication date. It is acceptable for research outputs to be made openly accessible either in an institutional repository or somewhere other than an institutional repository, for example, through a publisher's website, provided that the published version of the article is OA with an associated licence, such as a Creative Commons licence. Research outputs may also be deposited in an openly accessible public digital archive. The application of Creative Commons Attribution licences (CC BY) to research outputs is preferred but not a requirement.

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[1] https://www.coalition-s.org/feedback/

[2] https://www.arc.gov.au/policies-strategies/policy/arc-open-access-policy

[3] https://nhmrc.gov.au/about-us/publications/open-access-policy

General comments

The AOASG and CAUL welcome the aspirations of Plan S to move towards immediate full open access. We share the frustration of the Plan's architects that there has not been sufficient movement by publishers towards OA and agree that there is an imperative to compel publishers to address the needs of researchers and funders by providing the services that the research sector needs in order to implement full open access.

In particular, we believe that there is a need to have a diverse range of publishing models for different parts of the research sector; these models should include, but are not limited to, venues for preprints, journal articles, books, monographs and places for non-traditional research outputs (NTROs), especially those that arise from the humanities and social sciences.

In saying this we note the submission made by the Harvard Library and MIT Libraries[4] and by the Confederation of Open Access Repositories (COAR)[5]. We support their position that Green OA options with respect to repositories need to be broadened to make it less onerous and more viable for researchers, particularly to avoid impacting Early Career Researchers (ECRs).

From a regional perspective, support for repositories is essential if countries like Australia and New Zealand are to reach a position where Plan S could be adopted by their funding agencies. Without a viable Green OA option it will be impossible for Australia, New Zealand and other countries that rely on repositories for OA to comply with Plan S.

Feedback on the consultation questions

Our main feedback relates to the role of repositories, which we think are not fully integrated or addressed in Plan S. In Australia and New Zealand, university repositories are the primary mechanism by which open access is supported, including through the OA policies from the two major Australian funders and the universities which have OA policies.

Without adequate support for these kinds of institutional repositories in Plan S it is unlikely that Australian funding agencies could adopt the plan, and universities would struggle to comply with its mandate.

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

We agree with the requirement under 10.2 that a repository must be registered in the Directory of Open Access Repositories (OpenDOAR) or be in the process of being registered. However, we strongly prefer institutional, university or research institute repositories as repositories of preference, with publicly-run discipline-specific repositories used when institutional, university or

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[4] https://libraries.mit.edu/news/harvard-library/29052/

[5] https://www.coar-repositories.org/news-media/coar-feedback-on-the-guidance-on-implementation-of-plan-s/

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research institute repositories do not exist or are not appropriate. We would not support the sole use of publisher or privately run repositories as acceptable venues for research outputs.

Our response to the specific criteria listed under section 10.2 is shown in the table below. To summarise we believe that most of the criteria are not necessary for a repository to support OA and several of the criteria present hurdles that will prevent repositories in Australia and New Zealand from complying with Plan S. We recommend that these criteria be made optional, and that a criterion be added to ensure that any repository is managed sustainably and that a repository manager contact is provided for advice and support.

Criteria	Response
Automated manuscript ingest facility	Unnecessary, many current platforms cannot meet this requirement.
Full text stored in XML in JATS standard (or equivalent)	Unnecessary, many current platforms cannot meet this requirement.
Quality assured metadata in standard interoperable format, including information on the DOI of the original publication, on the version deposited (the author accepted manuscript or the version of record), on the open access status and the licence of the deposited version	Agree
Open API to allow others (including machines) to access the content	Unnecessary, many current platforms cannot meet this requirement.
QA process to integrate full text with core abstract and indexing services (for example PubMed)	Unnecessary
Continuous availability	If this requirement refers to permanent availability online, then it seems appropriate.
Help Desk	Unnecessary

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

Plan S is largely silent on the cultural transformation required to overcome the current incentives to research activity - which is driven by league tables, journal rankings, and citations. Although the Declaration on Research Assessment (DORA) is mentioned, there needs to be greater specification of targeted activities, especially regarding how they will be coordinated internationally.

The implementation plan is not clear on whether responsibility for the implementation of Plan S sits with the research institutions, or the funders. If the latter, how will funders be supported to cover the administrative overheads for the management of author copyrights, or compliance? Will the financial burden shift from universities (e.g. subscription costs) to funders for publishing charges? In this context it will be important to ensure funders will be willing and fully equipped to adopt Plan S.

There needs to be a fuller, more nuanced discussion and broader recognition of the cost of new and existing infrastructure – such as DOAJ, or DOAR – that is required in order to manage the requirements of Plan S and enable the 'open' landscape to expand.

There needs to be strong involvement of researchers in the implementation of Plan S and it is especially important that the needs of ECRs are considered. ECRs are the group most likely to be affected if the system for incentives in academia is not properly adapted to encourage open scholarship. They are also those who are least likely to be able to afford article processing charges if they are not fully supported by funders. Hence, repository based open access in particular is a very important mechanism to support open access by ECRs.

To encourage researcher involvement Plan S needs to better articulate the benefits that repository based open access, and an increasing number of open access journals will bring. Particularly it should be clearly stated that if repository based OA is supported, researchers could continue to publish in the same journals.

The increasing number of fully open access journals provides greater choice by encouraging competition and diversity in the emerging 'open' landscape. The message should be that it is now imperative for publishers to work with academics, societies and funders to adjust their business models to develop the open access outlets that are needed by the academic community. We do not support the criticism that Plan S is an attack on academic freedom.

Libraries have long been advocates for OA and Plan S can serve as a way to reinforce the need for university executives to work with libraries in order to change the flow of funds in support of open publishing – for example the approach that the University of California is currently implementing[6] where, at least in the short term, some research funds are redirected to support open access models.

Plan S is limited to scholarly articles and it does not provide sufficient recognition of Non-Traditional Research Outputs (NTROs) including data and outputs from non-STEM disciplines. There is a need to

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[6] Pay it Forward - Offsetting Pilots https://ucsd.libguides.com/scholcom/initiatives

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further consider the particular circumstances for non-STEM disciplines and their research outputs in the plan.

Commercial publishers are rapidly building infrastructure, workflows and business models to attract and accommodate a growing corpus of research data into their business. Their aim is undoubtedly to grow their business and revenue streams. The result may ultimately mirror the control and manipulation in the current journal article publishing marketplace. With the adoption and implementation of national research data services, we believe that Plan S should be inclusive of all research outputs. Addressing OA to research data via Plan S now will exert additional pressure on commercial publishers and research-intensive institutions to influence research culture and researcher behaviour.

Plan S Implementation is limited to scholarly articles. It has been suggested that different licences are required for scholarly articles in different disciplines and also may be appropriate for NTROs. It is our view that the CC BY licence achieves maximum dissemination. Hence, in the context of scholarly articles, different disciplines do not require different licences, but the latter may be appropriate for NTROs.

The League of European Research Universities (LERU) response to Plan S stated that "Plan S notes that the move to OA monographs may take longer than 1 January 2020. It should be noted that some University Presses in LERU universities are already producing OA research monographs, with tremendous results."[7] We agree with this perspective and note the importance of monograph publishing in this region also.

Concluding remarks

In conclusion, we support the aims and intention of Plan S. Its success, however, will depend greatly on how carefully it is implemented and for that it will be imperative to ensure that there is continued transparent, global consultation. To this end we recommend the establishment of a formal mechanism to discuss and support the implementation of Plan S going forward.

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[7] LERU's reaction to Plan S https://www.leru.org/news/accelerating-the-transition-to-full-and-immediate-open-access-to-scientific-publications-lerus-reaction-to-plan-s

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