

University of Oulu has submitted an institutional response to the Plan S consultation. This response takes into account feedback received from University academics. The response is available below.

University of Oulu response to Plan S consultation

University of Oulu is pleased to make this response to the cOAlition S consultation on Plan S. University of Oulu is an international science university which creates innovation for the future, well-being, and knowledge through multidisciplinary research and education. Founded in 1958, our research and education community is 13 500 students and 2800 employees strong, and one of the biggest and the most multidisciplinary universities in Finland.

University of Oulu is fully committed to a transition to Open Access, but we want to bring out our concern about the uncompromising approach Plan S is presenting. It is unfortunate that Plan S does not seem to promote development of new innovative publication models.

Plan S generally interprets OA in very narrow terms. It imposes unnecessary restrictions for compliance while not opening any new ways to OA. In practice, it labels a significant portion of currently freely available, fully OA articles as being published in a non-compliant way.

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

Time schedule:

University of Oulu agrees with the general aim of Plan S, immediate openness being the goal. It is very important that all measures to be taken aim for immediate open access. We think it is the only way to think about open access in a long run. However, the timeline specified in Plan S is not realistic. There are several reasons for that already introduced in dozens of comments given on Plan S.

The need to renegotiate agreements with all publishers to achieve transformational agreements on short notice will require large amounts of resources - both funding and experienced staff. Is there any support planned for that?

The idea of zero embargo green OA and technical requirements for repositories cannot be fulfilled within the planned time schedule. It is also unrealistic to expect that sufficient amount of new high-quality open access platforms and journals will be created by 1st January 2020.

Licenses:

The requirement of using just the CC BY license is too strict. In addition, CC-BY-SA and, CC-BY-ND should be allowed and even CC-BY-NC should be considered. The main thing here is that the copyright stays with the author (the original holder).

Repositories:

Requirements for repositories in Plan S are too strict and even harmful for the development of open access and goals set by Plan S. OpenAIRE has introduced technical requirements and quality standards for repositories and these requirements should be sufficient. OpenAIRE also plays the role of a centralized repository for scientific publications and a producer of TDM (text data mining) services.

We suggest requiring OpenAIRE compatibility as a sufficient criterion for Plan S compliance, and loosening the following technical restrictions on repositories from required to recommended

1. Automated manuscript ingest facility
2. Open API to allow others (including machines) to access the content
3. Full text stored in XML in JATS standard (or equivalent)
4. QA process to integrate full text with core abstract and indexing services (for example PubMed)
5. Helpdesk

These changes are aligned with the recommendations by The Confederation of Open Access Repositories (COAR), and they will allow the use of a vast pool of existing local repositories to achieve green OA in a cost-effective way.

cOAlitionS as a financial supporter for services:

How will cOAlitionS support the infrastructures and services needed for implementing Plan S? Services like DOAJ and Sherpa/Romeo are crucial services for Plan S, and they need continuous support for maintaining and developing their services. How will cOAlitionS members participate and support the OA turn of learned societies? Especially in small countries, these societies need continuous financial support if they lose their income from scientific publications. In addition, how can the researchers find Plan S compliant journals/platforms? Will there be a list of them, and who will maintain such a list and control that no predatory journals end up there?

There needs to be negotiations with the publishers about the zero embargo for green OA. Will cOAlitionS participate these? Zero embargo is a good goal, but it will not be reached and should not even be aimed for with the timeline set by Plan S. If negotiations for zero-embargo Green OA come with a new financial model that requires a reasonable financial cost per article, Plan S funders should commit to the funding of these fees on equal footing as they commit to funding Gold OA APCs.

Transformative agreements:

Transformative agreements need much clearer and detailed definitions. What if an agreement is not followed? What kind of sanctions are needed? What parties enter the agreement?

It is difficult to judge the financial impact of Plan S without knowing APC caps. How will the APC caps work? Will the APC difference for journals with APC above the cap have to be paid from other sources or will such journal be considered non-compliant?

Between what parties is the transformative agreement made? Journals will or will not flip globally, which will then naturally apply to all agreements with that journal worldwide. There is no OA-flip based on individual institutions.

Merits, and with respect to early stage

In the case that a significant number of publishers do not make the transition to OA, there is a threat of dividing the scientific community into two publishing ecosystems - one aligned with Plan S and one not. This might give rise to differences in publication profiles within the two groups based on available journals. There is a threat of negative impact on the international collaboration possibilities if Plan S is perceived as a limitation to publishing opportunities.

How will this impact early career researchers that face limited options for their publications and who could no longer publish in the high-quality journals?

While we appreciate San Francisco Declaration on Research Assessment's (DORA) intention to curb the abuse of bibliometric indicators as a means to compare journals, its principles have not yet been widely implemented worldwide. DORA's reward and promotion systems need to be firmly globally in place before any science policy can be built upon its principles.

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

The green OA route should be more specifically supported by the Plan S as it provides a more cost-efficient way to achieve OA. The current implementation guidelines of Plan S place disproportionate amount of focus on Gold OA.

Development of new innovative publishing models should be actively promoted.

Conclusion

University of Oulu is happy to support the objectives of Plan S and it sees Open Access as the desired direction for scholarly publishing. However, in its current form Plan S is too strict to meet the expectations. The proposed time frame for the large changes is very short, and there are still important details to be decided. In particular, we want to highlight that Plan S does not take into consideration new alternative ways of scholarly publishing that would be more sustainable and flexible than the current system.