

## Open Access and the implementation of Plan S

# The Guild's position paper on Open Access and the implementation of Plan S

## Introduction

The Guild welcomes the commitment of the European Commission and of European research funders to strengthen the integrity, transparency and availability of research outputs. We also welcome the discussions in the scientific community about Open Access and Open Science unleashed by the publication of Plan S. Now, The Guild wants to build on its [submission to the Plan S consultation](#) to contribute to the wider debate about how Plan S can help realise the ambitions of Open Science.<sup>1</sup>

Universities are the largest employers of scientists, whose research practices, peer reviews, career evaluations, and commitment to ethical standards are critical for Plan S to succeed. Universities also fund publications and data repositories. The movement towards Open Access, and specifically towards Plan S, can only succeed if universities fully engage in planning the goals of Plan S and its implementation.

In this context, The Guild looks forward to further clarifications and modifications to Plan S to avoid unintended and unnecessarily disruptive consequences. Guild members have taken significant steps to implement strategies towards Open

Access and are committed to engaging further in this area. Based on these experiences, we call for a more ambitious and structured dialogue between the European Commission, universities, research funders and learned societies.

## Recommendations

### 1. Involve universities in a staged implementation of Open Access and promote care before speed

The implementation of Open Access through Plan S requires dialogue and collaboration among universities, research funders, the European Commission, and learned societies. For this dialogue to happen in a meaningful and structured way, we need to exercise care before speed. As stressed in our response to the consultation, the timeline for Plan S is too ambitious. Implementing it as it stands would be unwise without having proper transition measures and due consideration of the implications for research practice.

We therefore call for a staged approach where funders, universities and other actors can have a constructive dialogue and tackle the many building blocks that will contribute to the successful

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<sup>1</sup> See [https://www.the-guild.eu/news/2019/guild-feedback\\_plan-s-guidance\\_final.pdf](https://www.the-guild.eu/news/2019/guild-feedback_plan-s-guidance_final.pdf).

implementation of Open Access, such as repositories, rewards and incentives, intellectual property rights, needs of different disciplines, the roles and responsibilities of each actor, and researchers' awareness of and support for Open Access.

In addition, Guild members have identified the following areas and actors that can find the implementation of Plan S particularly problematic:

- Small, new and interdisciplinary subject areas
- Subject areas that currently do not have recognised, high-quality Open Access channels
- Temporary academic staff and early career researchers
- Recruitment processes for researchers from countries that are not subject to Plan S
- Co-publications with researchers not subject to Plan S
- Learned societies

Besides allowing the closer consideration of these areas where the implementation can be problematic, a staged approach would also enable institutions to assess and capitalise on existing best practices.

## 2. Clarify the scope of Plan S

Clarifying the concept and the objectives of Plan S is crucial. The current Guidance can be misleading as it states that "Plan S applies to all scholarly output." We therefore recommend that the Guidance be amended to explain that Plan S addresses only outputs in the form of journal publications and scientific books, and that data (especially underlying data) is excluded from the scope of Plan S.

Additionally, publications are a relevant part of universities' contribution to society and the diffusion of knowledge, and go hand in hand with the pursuit of education, learning and research. It is important that researchers are able to choose the most effective publishing venues that maximise the circulation of their research. Obstacles to such an effective circulation of knowledge should therefore be removed.

## 3. Promote collaboration on rewards and incentives as a key enabler of Open Access

The question of rewards and incentives is central to a true transition towards Open Access. It is essential that Open Access is considered as part of the greater cultural change required to support Open Science.

We urge cOAlition S to consider rewards and incentives as the key enablers of Open Access, instead of imposing sanctions as proposed by Plan S. Achieving a cultural change in the scientific community has to be a process that is founded in the values of academia. In this respect, a dialogue with stakeholders will be important to discuss how we can collectively develop research assessment practices and emphasise the importance of merit rather than publication venue. Considering these questions in silos will not lead to consensus in the scientific ecosystem.

Further progress would be especially beneficial in the following areas:

- Addressing the differing approaches to research assessment: Institutions and funders are starting to develop new models to assess researchers based on their merits rather than on publication venues. However, these new assessment models will coexist with models based on current indicators such as journal-based metrics. This risks creating competitive disadvantages for some researchers in the global research market.
- Building on existing initiatives such as the San Francisco Declaration on Research Assessment (DORA), the Leiden Manifesto, and other relevant initiatives that are not yet universally implemented at the institutional and funder level, while recognising that there might be different ways to achieve this transition and giving universities the flexibility to adopt the evaluation approaches that best fit their needs and those of different disciplines.

#### **4. Support scholarly-centred and sustainable Open Access publishing models that maximise the benefits of research**

A scholarly-centred approach to Open Access that recognises the centrality of the work of researchers as producers of knowledge, peer reviewers and editors, is the guiding principle that should underpin the development of any new publishing models. The ultimate goal should be to maximise the benefits of research and circulate knowledge not only within research communities but also society at large through sustainable publishing practices.

Although Plan S affirms not to favour any specific business model for Open Access publishing or advocate any particular route to Open Access, it does in practice promote an APC-based approach to Open Access that particularly benefits profit-oriented publishers. This will exacerbate an already unsustainable situation. As mentioned in the Commission's report on *The Future of Scholarly Publishing and Scholarly Communication*, Article Processing Charges (APCs) currently make up at least 12% of institutions' journal spending,<sup>2</sup> and they are increasing at a steep rate.

There is therefore a need to support alternative and sustainable non-APC models. They will be especially important for the development of a healthy Open Access ecosystem that can support all researchers. However, the process of establishing new and reputable publication venues that researchers embrace is lengthy and complex in any given discipline. Collaboration between funders, university libraries and disciplinary communities will be crucial to identify fields where Open Access journals, platforms or infrastructures are needed.

We also recommend that funders collaborate with the European Commission to explore whether the use of the Open Research Publishing Platform could be extended to all publicly funded publications, beyond those created through Horizon 2020 or Horizon Europe projects. However, such a platform must remain independent, transparent and

open-source. It should be managed by an entity with no conflicts of interest, and include a high-standard quality control process in order to ensure the publication of excellent research. It is also important that the Commission works with existing publishing initiatives in universities and non-profit organisations, to understand how they can be supported and linked to the platform the EU intends to build.

#### **5. Ensure flexible licencing to take into account the needs of specific disciplines and intellectual property rights**

While it is clear that copyright should remain with the author and not be transferred to the publishers, we believe that the requirements regarding licenses proposed by Plan S are too restrictive. We therefore recommend Plan S to change these requirements and to add an exemption clause for the use of the Creative Commons CC-BY-NC and CC-BY-ND variants, to take into account the needs of specific disciplines and communities. For example, as stressed in the British Academy's response to Plan S, including ND licenses is particularly important for the Social Sciences and Humanities.<sup>3</sup>

Intellectual property rights and patent protections should also be given proper consideration when defining permitted licences, to maintain a balance between Open Access and the valorisation of discoveries through patents.

#### **6. Avoid fragmentation that can be detrimental to research collaboration**

Fragmentation is a cause of concern as regards the successful implementation of Plan S and the move towards Open Access. As transnational scientific collaboration has increased in significance, it is therefore crucial that Plan S aligns as much as possible with similar initiatives in other parts of the world (such as AmeliCA in Latin America and the Global South) and that it gains the widest international support. This would minimise uncertainty when researchers collaborate with international

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<sup>2</sup> European Commission - DG Research and Innovation (January 2019). "Future of Scholarly Publishing and Scholarly Communication: Report of the Expert Group to the European Commission," p. 18.

<sup>3</sup> British Academy (2018). "Science Europe's Plan S: making it work for all researchers." Available at: [https://www.thebritishacademy.ac.uk/sites/default/files/British\\_Academy\\_paper\\_on\\_Science\\_Europe\\_Plan\\_S.pdf](https://www.thebritishacademy.ac.uk/sites/default/files/British_Academy_paper_on_Science_Europe_Plan_S.pdf).

colleagues. Besides addressing it at a global level, fragmentation needs to be avoided within Europe itself as at the moment not all European funders have signed Plan S.

The Guild acknowledges that the issues of international alignment and avoidance of fragmentation cannot be easily solved by the revised Guidance. However, we believe that a more structured dialogue and cooperation will help address these concerns and will ultimately lead to a more coordinated and consistent approach.

## **7. Ensure coherence between Plan S and Horizon Europe**

The new framework programme for research and innovation is currently under negotiation and will make Open Science its *modus operandi*.

Although Open Access was already mandatory in Horizon 2020, the European Commission will reinforce certain requirements in Horizon Europe (such as embargo policies and compliant publishing venues), to align the programme with Plan S. However, it is still not clear what the extent of this alignment will be and whether Horizon Europe will strictly follow all the requirements put forth in the revised Plan S' implementation Guideline.

We recommend the Commission to ensure that its approach to Open Access in Horizon Europe is consistent with Plan S. A harmonised approach will greatly benefit researchers and help maximise impact.



Rue du Trône, 98  
1050 Brussels  
+32 (0) 2 2740-500  
office@the-guild.eu  
[www.the-guild.eu](http://www.the-guild.eu)  
Twitter: @guildeu



ALMA MATER STUDIORUM  
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