The Open Science Committee acknowledges the clarifications made to Plan S by the Implementation Guidance published on 27th of November 2018. These clarifications eliminate some ambiguities and are, for most of them, in line with the recommendations made by the Committee for the implementation of Plan S by the ANR (Recommendations for Plan S implementation by the ANR).

This short memorandum on “critical watchpoints” in response to the online consultation of cOAlition S is intended to highlight perhaps questionable points, or from our point of view, still unclear issues in the implementation guidance.

1. What are the points which are not clear enough or issues which have not been covered in the implementation guidance?

On the consideration of disciplines

COAlition S members should work together with learned societies and/or communities to take disciplinary specificities into account like scientific communication, editorial and publishing practices, and evaluation. These should be integrated in the implementation details of Plan S and also be consistent with its principles.

The survey which will be commissioned by cOAlition S on APCs and the APC caps that may result should consider this disciplinary dimension.

On phasing Plan S implementation

The current timeline may exclude many publishing and archiving platforms which do not have the means to comply with demanding technical requirements in such a short period of time. We recommend that the compliance criteria provided in points 9.1 and 10.1 should be required as soon as from 1st of January 2020 and those provided in points 9.2 and 10.2 later on, subject to funding by the cOAlition S members.

On CC-BY and licensing

Widespread distribution under CC-BY or CC-BY-SA open licenses should be preferred. However, it could be useful to accept CC-BY-NC licenses for a short period, to leave sufficient time for the cOAlition members to work with the publishers on establishing compliant amendment templates and agreements and for instructional work to be done among researchers about the use of these amendments and open licenses.

Finally, it should also be ensured that licenses associated with publications and those with data be in line.
On the transformative effect of Plan S

Plan S implementation rules allow a grantee to publish in a hybrid journal, to pay an APC fee by using non-Plan S credits and then to deposit this publication in an open repository under a CC-BY license. The disadvantage of this solution is that it does not have any transformative impact on the current publishing system. In monitoring Plan S implementation, the proportion of this compliance method will have to be assessed, and if necessary steps will have to be taken to avoid it.

On technical constraints

Imposing more technical constraints on open repositories than on journal platforms is not consistent.

On making full text available in XML-JATS

The objective of storing full text in XML-JATS or similar formats is in line with the FAIR principles in terms of editorial content reusability, interoperability, sustainability and property. It also opens up facilitating and qualitative avenues for TDM.

However, it is necessary to draw up a timeline and procedures for the technical compilation of native files, their contractual retrieval from publishers, especially as part of negotiations, and for their availability, in particular when deposits are made by authors in an open repository (self-archiving).

Support shall have to be provided to the underlying mechanisms or infrastructures of this necessary development. Technical and financial assistance will have also to be provided to publishers to integrate these technical requirements into their workflows and to open repositories to ensure the deposit and use of these formats in a self-archiving context.

2. Are there other mechanisms or other requirements that funders should consider to expand full and immediate open access to research outputs?

On support to open science infrastructures

Financial support from cOAlition S to the open science infrastructures, platforms and journals is indispensable. The funder should have a dedicated budget line to support open access infrastructures. This fund should be financed in proportion to the value of the projects supported.

On open citations

The open availability of citation data in compliance with I4OC standards should be included in the mandatory quality criteria for journals and platforms (point 9.2) and not in the additional quality criteria (point 9.3).