

2019-03-07

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## **Guidance for the implementation of Plan S:**

### **Comments from Formas – The Swedish Research Council for Environment, Agricultural Sciences and Spatial Planning**

We wish to express our appreciation for the implementation guidance of Plan S and the solid work that has been done to produce it. We also greatly appreciate the opportunity to submit our comments on the guidance. The guidance will play a crucial role in the continued work of implementing Plan S and in the long run for open access to scholarly publications.

Formas has completed a national consultation of the implementation guidance, which was carried out together with the Swedish Research Council Forte. In our comments we have considered the opinions and ideas received in the national consultation which we regard as relevant for the implementation guidance and for our work on realizing Plan S. This also applies to opinions gathered at the open hearing on the implementation of Plan S which Formas carried out in collaboration with Forte and the Swedish Research Council on January 22 this year. Our comments have also considered the work done by the National Library of Sweden (KB). KB is commissioned by the government to act as a national coordinating body in the work towards a transition to open access to scholarly publications. The assignment includes, among other things, a comprehensive investigation into five parts on various aspects linked to open access that will be published later in March.

#### **Comments from the consultation and the hearing**

Most of the comments received are also known from the national and international debate, such as, for example, the opinion that the timetable of Plan S is too tight, increasing APC costs, a lack of high-quality open access journals, concerns about young researchers' opportunities for international careers etc. A common point of view has also been about the lack of dialogue with the research community, about Plan S but also about open access in general.

Formas has, together with Forte, participated in the Swedish debate, but we realize that Plan S and its implementation will continue to require considerable communication efforts and engagement of the research community in dialogue. To some extent the very existence of Plan S has meant that such a dialogue on open access has begun, as well as that our hearing and consultation have led to a dialogue between different parties. But we also see that the implementation guide could better be

part of such communication and dialogue, if it is clarified and simplified. It is perceived by many as too technical and difficult to understand.

The concerns related to internationalization can be addressed with efforts to get additional funders to join cOAlition S, especially from countries outside Europe. We know that such efforts are already underway, and we highly appreciate the important work that has been done in this area.

## Timeline

There is a strong concern about the actual time for the implementation of Plan S, not least when it comes to when the requirements for immediate open access will affect the researchers who receive funding. The implementation guide gives the funders the opportunity to decide for themselves when the requirements should start to apply. Formas has announced that our requirements will not be applied retroactively but applies to the projects financed in calls opened after January 1, 2020 and onwards.

## Publication Costs

It is in the long run, important to work towards to achieve a standardization and control of the publication costs. Formas supports the idea that the author fees (APC) should not be applied to individual articles by individual researchers. Formas believes it would be preferable for costs to be handled centrally, either via grants directly to the national library consortium that negotiates the agreements with the publishers or via central funding at the university level. This would make the costs more transparent and allow for greater control. Such a proposal also exists in KB's report on costs for open access. Formas also shares Fortes' view that the wording "cOAlition S members will ensure financial support for OA publishing..." (p 3 in the document) may need to be modified. OA members will need to make sure possible APC are covered, but through which routes they are covered may vary.

## Transformative agreements

The wordings concerning transformative agreements should be clarified. In particular there is a need for an elaboration on how publishers can prove that they work towards a transition to another business model. (*The negotiated agreements need to include a scenario that describes how the publication venues will be converted to full Open Access after the contract expires*). It must be clear to everyone involved what applies to avoid misunderstandings. Transformative agreements should therefore include a plan describing how the publications should be converted to full open access following the contract expiry, which also has been pointed out by LERU.

## The merit system

Several of the comments received highlight the current academic merit system, usually based on a combination of the journal's perceived prestige and Journal Impact Factor (JIF), as a major obstacle. There is a need for clarification on how to manage the tensions between the current

meriting system and the requirements set by Plan S. How, for example, should the pronounced ambition in Plan S to support DORA (San Francisco Declaration on Research Assessment) be pursued and implemented? There is nothing stated about this in the implementation guide. Formas has signed DORA and intends to continue to clarify our policy in relation to the declaration, but also sees the need for several others to sign and follow the initiative. If funders and HEIs stop evaluating and meriting (rewarding) in relation to JIF, the path will be more open to achieve a healthy and alternative publishing market. It can also be added that the prevailing “publish or perish” culture is largely a result of the current meriting and ranking system.

## CC licenses and EU legislation and regulations

Clarification may be needed in the implementation guidance regarding the requirement of using CC licenses in relation to rules for intellectual property law and other international agreements, e.g. Nagoya Protocol on Access and Benefit Sharing (ABS). How does CC-BY relate, for example, to studies on genetic resources under the Nagoya protocol? Should it be possible to choose CC-BY-NC or CC-BY-NC-ND if there are specific legal or commercial reasons?

## Format and venue of publications

A major focus in the debate has been on open access publishing in journals, while the possibility of parallel publishing has not received as much attention. This potential should be highlighted but also better investigated in cooperation with national libraries. A few comments have been received which, from a library perspective, raise concerns that the implementation guide imposes too high technical requirements on repositories and open archives, which therefore risks making it difficult for parallel publishing. The answers support the views expressed by MIT / Harvard and The Confederation of Open Access Repositories (COAR). One possible solution, instead of formulating it as absolute requirements, framing it as recommendations or as a road map or goal to meet. A possibility could also be to investigate if libraries can undertake the central task of archiving articles and thus further facilitating for researchers as well as helping to monitor that the repositories meet the requirements.

Like Forte, we also want to pay special attention to the publication of books and monographs. As part of the larger investigation on different aspects of open access in Sweden, The National Library has also been looking into this area. As could be expected, researchers in the humanities and social sciences need to be assured that their culture of publication is considered, and that the implementation of Plan S will not drive all research output into short journal articles.

## Open Access Journals and peer review

As pointed out earlier, the debate has largely been centered on the (feared) lack of journals with open access of high quality in a variety of topics and research areas. Moreover, it is often stated in the debate that open access journals do not have accepted expert review or, where applicable, substandard such. Although concerns about the lack of journals or, more importantly of deficiencies in the quality of existing ones must be taken seriously, the importance of highlighting and driving the issue of expert review as quality driving must be a shared responsibility. Perhaps, in line with the recommendations of the ERAC Standing

Working Group on Open Science and Innovation (SWG OSI) 2018, we should jointly work to increase recognition and reward for researchers' reviewing work.

We also believe, that it is not realistic as funders to be setting up new OA journals in fields where they are lacking. There are enough journals, but the quality of peer review must be guaranteed. Important international initiatives have also been taken to support the researchers to find openly available publication channels, with high quality and good expert review. Here can be mentioned DOAJ, Think, Check, Submit and OASPA. However, we see the possibility of financially supporting transformative agreements, in cases where such funds are lacking at the university level.

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