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EU-LIFE Answer to Plan S Implementation Guidelines

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On 4th September 2018, cOAlition S announced Plan S. A group of national funders and charitable foundations, (cOAlition S) endorse the plan with the support of the European Commission and the European Research Council to achieve full and immediate open access to scientific publications. To reach this bold goal, the coalition commits to implement specific measures on new funded grants by 1th January 2020 following 10 principles¹.

Later on, cOAlition S published a guidance on implementation of Plan S and opened a public consultation.

EU-LIFE supports open access to scholarly publications recognising the rights of every researcher and citizen to access scientific literature (publishing as well as reading and re-using) as we believe science to be a public good for society.

After careful analysis and exchange with additional stakeholders, directors of the EU-LIFE alliance, representing 13 European research institutes of excellence in life sciences express their views on Plan S ([LINK](#)) as well as on the two main questions on implementation from cOAlition S.

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

We appreciate that the Plan S guidance document addresses several concerns raised by our previous statement and by other research communities.

We believe that there are main points that cOAlition S needs to address more in depth with diverse stakeholders during the upcoming months.

Global approach

A worldwide approach is essential to achieve genuine open access for the benefit of scientists and citizens. Without a timely coordination with other continents, it is very dangerous for Europe to forbid its researchers to publish in so-called high rank journals. This would damage the competitiveness of European researchers and challenge global collaborations. The guidance document does not provide a route to ensure that the shift in scientific publishing is global.

Research evaluation system

cOAlition S members intend to sign DORA and follow its principles for evaluation. At this stage, we would expect cOAlition S members to sign *de facto* the DORA and Leiden Manifesto. In addition, the guidelines should include clear coordinated approaches to ensure that research evaluation will focus on quality rather than bibliometric indicators. cOAlition S monitoring and evaluation activities should also centre on their research evaluation system.

¹ <https://www.scienceeurope.org/coalition-s/>

As cOAlition S is providing incentives to create new OA journals/platforms where needed, they should also contribute to provide incentives for research organisations and funders to evolve their evaluation system towards DORA principles.

Transformative agreements

Moreover, the approach to transformative agreements is unclear, and it is not explained with whom publishers will sign these documents. Considering that over 80% of journals would not be compliant with Plan S, we believe cOAlition S should have a more in depth assessment of risks.

Learned societies

Several stakeholders expressed serious concerns about the sustainability of small and medium learned societies that invest publishing revenues for the benefit of the research ecosystem. The study promoted by the Wellcome Trust and UK Research and Innovation (UKRI) to explore alternative business models for learned societies is relevant but will only focus on UK societies. This approach does not address fully the concerns from the European research community.

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

Collaboration with researchers

We strongly advocate for cOAlition S members to collaborate more closely with researchers, research performing organisations and learned societies to achieve OA. We need to place researchers and their interests at the centre of the dialogue to avoid damaging the core engine of knowledge production. After the online survey, cOAlition S could engage in a fruitful dialogue with the researchers and associations that represent them.

Public regulation

Governments and public authorities should design and develop policies and regulations for the publishing industry (like for example for fuel and other products) to avoid inflated profits and drive the overall pricing down, while ensuring a high level quality system for scholarly publishing.

Quality of the publishing system

It is extremely important to keep and further advance professional peer-review and quality control processes, including the provision of statistical packages to run over raw data and images to check the consistency of the research data analysis in the papers. These processes are fundamental to ensure high level quality of published manuscripts. The guidance to Plan S is providing measures to ensure quality and we would like to stress their critical relevance and further development.



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For more information

Dr. Michela Bertero

EU-LIFE representative at the European Open Science Policy Platform

Email: michela.bertero@crg.eu

Phone: +34933160257

EU-LIFE is an alliance of research centres whose mission is to support and strengthen European research excellence (www.eu-life.eu). EU-LIFE members are leading research institutes in their countries and internationally renowned for producing excellent research, widely transferring knowledge and nurturing talent.

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