

Joint Statement on Implementation Guidance for Plan S

[Plan S](#) is an initiative by [cOAlition S](#) to achieve full and immediate Open Access to scientific publications after 01 January 2020 in Europe. At the heart of the plan are [10 principles](#) currently being developed into a set of [implementation guidelines](#). We, representatives of early-career and senior researchers across Europe, have already [commented on Plan S](#) and hereby reaffirm our general support and offer our views on the implementation guidance.

We commend cOAlition S for addressing initial concerns and for the [open consultation](#) on the guidance. There are now three clear routes to compliance via either author-accepted manuscripts or versions of record of publications. It is crucial, however, that cOAlition S ensures that these routes are viable through appropriate regulations, funding, and support. We reiterate three key concerns from our first statement on Plan S: disruption for doctoral dissertations should be minimised; venues with no author-facing fees and societies as well as open infrastructures should be supported; institutions and funders should modernise their researcher evaluation and [implement the Declaration on Research Assessment \(DORA\)](#).

(1) We agree that **copyright** on publications should stay with the original copyright holder and not be transferred to publishers. The copyright holder is typically the author and/or institution, which can depend on legal requirements, but is often not explicitly stated. We encourage cOAlition S to recommend the author as copyright holder where legally possible.

(2) We agree that the **licence** on publications should by default be [Creative Commons \(CC\) Attribution \(BY\)](#), to maximise benefits of research for society via the right to reuse, modify, and redistribute. We also agree that Non-Commercial (NC) licences are not justifiable for publicly funded works. While Non-Derivative (ND) licences can restrict text-and-data mining (TDM) and Open Education, we disagree that they should not be allowed, because of concerns over misrepresentation and translations in the Humanities and Social Sciences. We encourage cOAlition S to allow researchers to opt out of CC BY for a CC BY-ND licence.

(3) We agree that publications should be **identifiable** via persistent identifiers (PIDs) and **archived** via long-term digital preservation programmes. Publications should use PIDs such as [Digital Object Identifier \(DOI\)](#) that enable versioning, and link to underlying data and code and author PIDs such as [Open Researcher and Contributor ID \(ORCID\)](#). Archiving programmes should use multiple data pools and bitstream preservation such as [Controlled Lots of Copies Keep Stuff Safe \(CLOCKSS\)](#). We note that there are other valid options and encourage cOAlition S to specify the requirements for PIDs and for archiving programmes.

(4) We agree that publications should have high-quality **metadata** that is available under a Public Domain (CC0) licence. This includes information on the publication such as the PID, version, author, copyright holder, licence, open status, and funding as well as information on all citations in the publication. Guidelines by [OpenAIRE](#) for publication metadata and by the [Initiative for Open Citations \(I4OC\)](#) for citation metadata are ideal but there are other valid standards. We encourage cOAlition S to specify the required standards for metadata.

(5) We agree that the metadata and full text of publications should be **machine-readable** in an interoperable format allowing TDM. [Extensible Markup Language \(XML\) Journal Article Tag Suite \(JATS\)](#) is an ideal format but is technically challenging, and other valid formats

exist such as [HyperText Markup Language \(HTML\)](#) or minimally Word, OpenDocument, and LaTeX. We encourage cOAlition S to specify other acceptable publication formats for TDM.

(6) We agree that publishing **venues** should offer high-quality peer review and register their self-archiving policy in [SHERPA/RoMEO](#), as well as be registered in the [Directory of Open Access Journals \(DOAJ\)](#) and be transparent in their publishing costs and pricing. Peer review should follow standards set by disciplines and the [Committee on Publication Ethics \(COPE\)](#). We are concerned that DOAJ acting as a sole external gatekeeper could result in a single point of failure (SPOF) for identifying compliant venues. We encourage cOAlition S to create and maintain a 'seal of compliance' for venues in close collaboration with DOAJ.

(7) We agree that **article processing charges (APCs)** should be paid or supported by cOAlition S where applicable and that there should be equitable waiver/discount policies. The ability to publish should never be constrained by the ability to pay. There should not only be clear regulations for waivers/discounts for authors in low/middle-income countries but also for authors with limited financial means. The planned independent study on publishing costs and pricing will help to determine a reasonable range and cap for APCs. We encourage cOAlition S to develop clear regulations for APCs and for waivers/discounts for authors.

(8) We agree that **repositories** should use an open application programming interface (API) and be registered in the [Directory of Open Access Repositories \(OpenDOAR\)](#), as well as be continuously available and offer user support. [ResourceSync](#) is an ideal API although other valid APIs exist such as [Open Archives Initiative \(OAI\) Protocol for Metadata Harvesting \(PMH\)](#) and [Object Exchange and Reuse \(ORE\)](#). We disagree that repositories should have a help desk as long as they offer adequate user support. We also disagree that repositories should have automated ingest but should be free to choose how to ingest. We are concerned that OpenDOAR acting as a sole external gatekeeper could result in a SPOF for identifying compliant repositories. We encourage cOAlition S to specify acceptable APIs and to create and maintain a 'seal of compliance' for repositories in close collaboration with OpenDOAR.

(9) We agree with allowing **transformative agreements** with publishers to read and publish publications during a time-specified transition period. This gives hybrid venues more time and researchers more options during the transition. All agreements should be transparent and be registered with the [Efficiency and Standards for Article Charges \(ESAC\)](#) as well as specify how the venue will transition once the agreement expires. It is currently unclear what sanctions will be imposed if a venue does not transition as agreed and whether older paywalled publications will be opened. We encourage cOAlition S to specify the sanctions to be imposed on venues that do not transition and to address older paywalled publications.

(10) We agree with direct **deposition** of publications in author-designated or centralised repositories for scientific publications. We note that a compliant repository for researchers should always be available and that there is no centralised repository in Europe apart from [Europe PubMed Central](#). We encourage cOAlition S to designate and support [Zenodo](#) as a fall-back compliant or even as a centralised European repository for publications in Plan S.

Signed by Gareth O'Neill [President [European Council of Doctoral Candidates and Junior Researchers \(Eurodoc\)](#)], Matthew DiFranco [Chair [Marie Curie Alumni Association \(MCAA\)](#)], and Mangala Srinivas [Chair [Young Academy of Europe \(YAE\)](#)] on 28 January 2019.

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