



# Netherlands Organisation for Scientific Research

## Main outcomes of NWO/ZonMw consultation meeting on Plan S

On the 31st of January NWO and ZonMw organised a consultation meeting as part of the public feedback on the implementation of Plan S. The meeting was very well attended with over 250 people representing all segments of the Dutch research community: researchers in different stages of their career, policy makers, librarians as well as members of the boards of the various stakeholder organisations: the Royal Academy, the Association of Universities in The Netherlands, the Dutch Federation of University Medical Centres and many other organisations.

Goal of the meeting was to inform all stakeholders about Plan S and to collect feedback about the proposals for implementation, as they have been published on the 27<sup>th</sup> of November in the [Guidance on the Implementation of Plan S](#).

This was the second meeting about the consequences of Plan S held in the Netherlands. The first one was organised by the Royal Academy on the 1<sup>st</sup> of November. At that time the proposals for implementation were not yet available.

The consultation meeting took place in an **open, constructive atmosphere**. At the same time **real and serious concerns** were raised about various aspects of Plan S, especially about the **speed** with which this plan will be implemented. All attendees declared to approve of Open Access. However, the way to achieve open access, the **speed** with which Plan S is intended to be implemented and the limited amount of time that is left for all stakeholders to adapt, does worry a lot of researchers. Many feel that **more time is needed** to work out the details and **a longer transition period** maybe needed to achieve the broadest possible support in the community.

This document presents the main outcomes of this consultation meeting. Many different aspects have been discussed. It would be impossible to do justice to every attendee and everything that has been said. However: in this document we present **as impartially as possible** the main points that have been raised. The executive board of NWO hopes and expects that these points will be taken into consideration in the next phase and will be addressed in the proposed revision of the implementation document. It will be submitted as part of the public consultation on Plan S and must be seen as complementary to the feedback submitted by other organisations and individuals from the Netherlands.

## The Dutch context

In order to appreciate the debate about Open Access in the Netherlands and the various comments that follow below, it is important to take into account the context of Open Access in the Netherlands. Therefore we start by pointing out some highlights about these development in recent years.

When it comes to Open Access the Netherlands has a long history and has always aspired to be a frontrunner. The earliest policy initiatives date back at least 15 years. Recently Open Access also has featured on the political agenda. In 2013 the Dutch government committed to the ambition of 100% open access in 2020. Important steps have been set with the Amsterdam Call for Action under the Dutch presidency and Council Conclusions that followed shortly. This has led to the situation that 50% (nearly 28,000 articles) of the peer-reviewed articles from 2017 from the 14 Dutch universities are available open access. To a significant extent this has been realised by the **successful negotiations conducted by the Dutch universities**. As from 2014 a range of **transformative (hybrid) deals** have been closed

with publishers. As part of these transformative deals Dutch researchers can publish without any individual charges open access in journals covered by these deals. (For an overview of deals and their specifics see: [www.openaccess.nl](http://www.openaccess.nl)). This has proven a successful strategy and has resulted in a sharp increase in the amount of articles that are openly available. The deals account for about 25% of OA available articles in the Netherlands and are highly valued by the Dutch scientific community. At the same time it must be concluded that these national deals have not yet resulted in a large-scale change of the business models. In this respect Plan S is welcomed as an important next step to realising full and immediate open access.

## **Main outcomes of the discussion**

### **1. Expected timeframe for implementation**

As mentioned above: one of the biggest concerns that has been raised during the meeting is the **speed** with which Plan S is developed and intended to be implemented. The basic principles of Plan S were announced only 6 months ago. The implementation details were presented at the end of November 2018. Many details are not yet clear. But still the aim is to have the new requirements of Plan S in place in the grant agreements as from January 2020. That leaves less than 11 months. Serious doubts have been voiced whether that will be feasible. Currently many journals are not yet compliant with the requirements of Plan S. Will publishers be able (and willing) to change their policies within a timeframe of less than 11 months? Because if they don't, researchers will be confronted with the situation that they cannot publish in the journals they are used to without the risk getting sanctioned by their funders.

### **2. Changes to the assessment system**

Participants of the meeting were virtually unanimous about the need to change the way research and researchers will be assessed. The fact that funders in Coalition S have expressed strong commitment to do so is welcomed. Several funders have set first steps on this path for instance by adopting the principles of the **San Francisco Declaration for Research Assessment (DORA)**. But many at the meeting felt that much more work has to be done and more time is needed to put in place these schemes also at universities. Especially **early career researchers** have expressed concerns about the effect of Plan S on their careers and expressed the feeling that the "rules of the game were being changed during the play". How will young researchers in countries which belong to cOAlition S be affected when they cannot publish in high impact journals like Cell, Nature and Science while their competitors in other countries can? Will PhD students from cOAlition-S countries have a chance to get a post doc position in countries where publications in high impact journals are still highly valued? How will their chances be affected when applying for ERC-grants? Will there be a **transition period**? During the meeting there was broad consensus that it is in the interest of academia at large to move away from using metrics such as H-index and Journal Impact Factors. But the discussion about how **alternative criteria** could look like, seems to have only just begun while Plan S is planned to be implemented already in 11 months. The majority of the attendees share the opinion that implementation of Plan S and implementation of alternative criteria for incentives and rewards of researchers should go hand-in-hand, and not sequentially.

### **3. Critical mass**

Related to the issue of changing the reward system is the question about the participation of the rest of the world in Plan S. Although new funders have joined, **Coalition S is still a relatively small** group of funders and represents only a small portion of the global research output. Participants welcomed the fact that China recently expressed its interests in Plan S. It was concluded that in order to be successful it is absolutely vital that many more funders and countries join the coalition. It was felt that we still lack big players in Europe (Germany, Sweden, Switzerland, Israel) but also absolutely need countries from other continents, especially America and Asia. If coalition S does not grow internationally scientific cooperation could be seriously hampered and it is feared that a **harmful split** would result between countries that do and do not fall under the requirements of Plan S.

#### 4. No one-size-fits-all

Another theme that was discussed at length in the meeting was the importance to acknowledge **the differences between publication cultures in different scholarly fields** and the need to develop routes to Open Access that fit the needs of the different disciplines. Coalition S has announced that it will commission a gap analysis to assess the current OA options in the various fields. During the meeting the first preliminary results were presented of such an exercise by Bianca Kramer and Jeroen Bosman of Utrecht University ([Kramer, Bosman, 2019](#)). They show that examples exist of all routes and combination of requirements proposed by Plan S. Several participants voiced concern however about the effects of Plan S on journals in their specific subject area. Coalition S has committed to **collectively support** the development of new OA journals / platforms or the flipping of existing ones if no high quality open access venues are available in certain disciplines. It was regretted though by some that the guidance documentation did not provide more information about this yet. What kind of **support** will be made available and when? It was pointed out that **starting new journals** and building up the trust and reputation needed takes time. Several attendees also suggested NWO to consider financial support for national initiatives like Sci-Post or a national repository like Arxiv.

#### 5. Learned societies

A topic which continues to spark a lot of discussion is the position of the **learned societies** which play a vital role in many scholarly fields. Coalition S has stated that it recognises the importance of these societies and the work they do for their members and field of study in general. Coalition S has already reached out to several of these learned societies and it was applauded that one of the members (Wellcome Trust) had attracted a consultant to work with a group of learned societies that are willing to make the transition to open access. The aim is to develop new business models that can help the move to Open Access while at the same time securing the financial means to sustain the broader activities these societies employ for their membership. Nonetheless, the overall feeling was that **a lot of work still has to be done** and this cannot be expected to be completed before the start of Plan S. Concerns also have been raised about the **smaller learned societies** in the Arts and Humanities. Here also a one-size-fits-all approach will most certainly not work.

#### 6. Focus on pay-to-publish gold

Although Coalition S has stated repeatedly that it does not favour any specific business model for Open Access publishing or advocate any particular route to Open Access, this was questioned a number of times during the meeting. It was mentioned especially in the context of the transformative deals. In the requirements for new deals to be negotiated after 2020, it is stated that a scenario should be included "that describes how the publication venues will be converted to full Open Access after the contract expires". If Coalition S is indifferent to specific routes then maybe this requirement should be revised and also provide the option that publishers convert to more liberal green / self-archiving policies.

On a more general level it seems that although the APC-model has been around for a while researchers are becoming **decidedly critical about the possible perverse financial incentives of this model**, especially when it concerns commercial publishers. Several speakers regretted the fact that Coalition S has until now not expressed more tangible support for the **Diamond model of Open Access**.

#### 7. Green route, self-archiving

Virtually all attendees welcomed the fact that in the implementation guidance Coalition S has clarified its position with regard to the green route to Open Access. Many however were critical about **the strict requirements Coalition S has set to this route**. The combination of requirements with regard to version, copyright retention, license to apply and zero embargo period rules out a substantial amount of journals. The reason Coalition S has raised the bar high is understandable: Plan S is not designed to accommodate the current publishing landscape. Its goal is to induce change. It was felt however by some that the current requirements are too strict. There were serious doubts whether publishers would commit to these requirements and if they would do so within the short time that is left before Plan S is expected to take effect.

More specifically there were doubts whether publishers would agree to the **CC BY license**. Some also raised concerns about the requirement to apply this very open licence and urged for the possibility to opt for more restrictive licences: CC-BY-ND or CC-BY-NC. It was suggested Coalition S should allow an opt-out for the preferred CC BY license.

As has been observed by others ([COAR, 2018](#)) also the **technical standards proposed for repositories** (XML, JATS, automated ingest, use of open APIs, obligatory help desk) seem too high. Virtually no institutional repository is expected to comply with these requirements at this point in time. It was suggested to qualify these aspects as recommendations.

## **8. Transformative deals**

Given the importance of the transformative (hybrid) OA deals in the Dutch context many researchers in the Netherlands applaud the fact that publishing in hybrid journals will be allowed under Plan S until 2025, provided that they are covered by transformative agreements. As was mentioned above: the Dutch universities have been very successful in reaching these kinds of deals with a large number of publishers. Extensive experience shows that these deals are very hard to close and often take many years in the making. **The requirements that Plan S has set for these deals are high.** Especially the requirement that new contracts should include “a scenario that describes how the publication venues will be converted to full Open Access after the contract expires”. We have learned there are examples of these kinds of transformative clauses in other countries (France). This proves real transformative deals are possible but it probably requires serious negotiating power to realise them. The Association of Universities in The Netherlands therefore has recommended **to give these transformative agreements enough time** and consider the possibility of an extra round of deals (especially meant for the smaller publishers) based on the evaluation by Coalition S in 2023 ([VSNU, 2019](#)).

## **9. Position of unfunded research**

Questions were raised also about the position of the unfunded researcher. Of course Plan S is aimed primarily at research that is funded by research councils that have subscribed Plan S. Its overall aim however is to change the publication landscape and this may lead to an increasing adoption of the pay-to-publish model. Due consideration should be given to the fact that in various scholarly fields there are authors that have no or limited access to funds to pay for APCs. Various publishers **apply waiver schemes** for such situations. It would be good if all publishers could adopt such policies.

## **10. Quality**

Coalition S has repeatedly stated that it will not give in on quality. Publicly funded research should be openly available for everyone, including to the general public. But a move to Open Access must not lead to a loss of quality or quality control. Coalition S has therefore proposed **quality criteria** and will work with the DOAJ to come up with a mechanism to identify whether journals comply with these quality criteria. Since the topic of quality, quality control and fear for loss of quality was raised in our meeting several times, we conclude that the proposals in the guidance document are not clear yet. Coalition S refers to the **COPE practices** mainly, which indeed represent strong industry standards. Maybe more measures are needed to assure researchers Plan S will not lead to lower quality. Participants also suggested to make a better distinction between quality criteria and technical requirements in the formulation of the guidance document.

## **11. Books and monographs**

Several speakers pointed out the specific difficulties for Open Access to books and monographs. Well-known solutions that work for transforming journals to Open Access don't necessarily work for books and monographs. It was noted that the policies of **Plan S currently are restricted to (peer) reviewed scholarly articles**. If Coalition S were to extend its policies to books specific attention was asked for trade books: books aimed for a broad readership often published by smaller national publishers. This is an important part of the scholarly communication in social sciences and humanities research and should not be overlooked.

## **12. Financial issues**

At the meeting concerns were expressed that Plan S will give rise to higher costs. Even though some analyses suggest that there is enough money in the system as a whole to cover all costs for full OA, some fear that Plan S will lead to more publications (also triggered by new, sometimes predatory journals). Moreover, some highly successful groups already suffer from the high APC costs: they cannot afford to pay APCs for all papers from their group. Members of cOAlition-S should explain how funders and universities will cover costs for full OA, since the new pay-to-publish model will require a shift of funding between funders, universities and libraries, which will require different measures in different countries. Before Plan S will be implemented, research groups should know who will pay for any costs related to full OA.

## **To conclude**

As mentioned above, researchers in The Netherlands are generally in favour of open access, but have many concerns with the path towards it as formulated in Plan S (see also [e.g. KNAW, 2019](#)). The launch of Plan S has fired a fierce debate in many countries. That is understandable, since we are talking about an existential aspect of every researcher's daily life: where to publish and how to reach his/her scientific community. The executive board of NWO decided to join Coalition S because it genuinely believes that open access is good for science and good for society, that ultimately finances a considerable part of that research. International cooperation is crucial to realise the transition to full and immediate Open Access. Plan S provides a unique opportunity to accelerate this development by aligning the policies of as many funders as possible. But to make a success of Plan S it is of crucial importance that the plan can rely on the broadest possible support. Therefore considerable efforts have to be made to address the many questions and worries that the scientific community still has at this point.