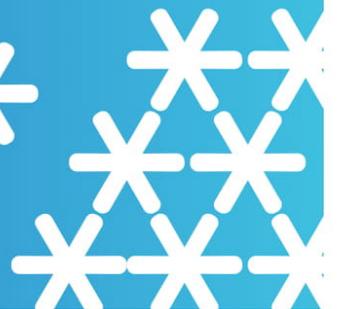# An analysis of the new revised Plan S policy

Conducted by SPARC Europe | June 2019

SPARC✳
Europe

SPARC Europe analysis of the new revised Plan S policy

Introduction

In September 2018, a group of national research funding organisations – with the support of the European Commission and European Research Council – formed a group called cOAlition S which is committed to implementing the 10 principles of Plan S in a co-ordinated way. Its goal is to make full and immediate Open Access to research publications a reality, its main principle now being:

> *"With effect from 2021, all scholarly publications on the results from research funded by public or private grants provided by national, regional and international research councils and funding bodies, must be published in Open Access Journals, on Open Access Platforms, or made immediately available through Open Access Repositories without embargo."*

In November 2018, SPARC Europe responded to this new policy and its principles with various suggestions on the implementation guidelines, many of which Plan S subsequently adopted. Then in late November, Plan S published its draft guidance on the implementation of Plan S requesting public feedback.

This document provides an overview of recent changes to the Plan S principles and Implementation Guidance as published on 31 May 2019 by cOAlition S in its press release. The revisions are the result of insights garnered during an open consultation period between Nov 2018 and 5 Feb 2019 and reflect feedback from universities, learned societies, publishers, scholarly associations, and individual scholars from more than 40 countries.

In this analysis, SPARC Europe focuses on changes to the principles, implementation guidance and technical requirements. This analysis is supported with material from the Rationale for Revisions (RfR) published by cOAlition S. A short summary that highlights the key changes is followed by a more detailed analysis.

11 June 2019

1.   Executive summary

This overview looks at the main changes to the Plan S Principles, its Guidance for Implementation and Technical Requirements.

SPARC Europe's summary of the 20 key changes to Plan S

1. The date of commencement has been delayed by one year to 2021. cOAlition S encourages its member funders to implement Plan S principles on all grants awarded from January 2021 now providing clear instructions on when and how this should be enforced.

2. Plan S addresses Open Access (OA) to research from not only public grants but also from private ones thereby extending the scope of potential material to be made OA. The revised principle speaks to a wider range of types of funders including international, national and regional research councils and funding bodies.

3. The main principle and other principles now include OA repositories as a venue for immediate OA deposit and without embargo, and on a par with OA journals and platforms. The former principle dedicated to repositories has thereby become redundant.

4. cOAlition S is conducting a gap analysis across disciplines to expand the share of OA journals or platforms. cOAlition S will develop incentives to establish more OA journals and platforms where needs and gaps exist.

5. cOAlition S will further explore the perceived transitional risks to OA for learned societies.

6. cOAlition S more clearly defines the term OA platform, which does not aggregate or re-publish already published material, e.g. Wellcome Open Research or Gates Open Research.

7. Authors or their institutions must retain copyright at no extra cost. cOAlition S is also intent on providing mechanisms to support this by developing or adopting a model 'License to Publish' for their grantees to ensure that no author needs to negotiate individually with publishers to make an article OA

   'Licenses to Publish' granted to publishers must now ensure that an author/institution may make either the Version of Record (VoR), the Author's Accepted Manuscript (AAM), or both versions available under an open license via an OA repository, immediately upon publication.

8. cOAlition S also commits to ensuring that authors or institutions retain copyright and the rights to make an article version (either the Version of Record (VoR), the Author's Accepted Manuscript (AAM), or both) immediately available under an open license by specifying this in their funding contracts or agreements – where possible.

   The deposition of the AAM or VoR in repositories now forms the only route to compliance for publications in subscription journals that are not under transformative agreements.

9. cOAlition S now requires that the CC BY 4.0 license be the default option for articles, secondary alternatives being the CC BY-SA 4.0 license and CC0. It also allows CC BY-ND on request with justification by the grantee.

10. The demand to standardise and cap APCs has been diluted in the new principle. It has been replaced by demands for fair pricing mechanisms relative to the service offered and favouring greater transparency with regard to fees. Fees may be standardised and capped in future if unreasonable price levels are observed.

    cOAlition S will also work on gaining transparency on pricing for various services such as triaging, peer review, editorial work, and copy editing for establishing fair publishing prices. Publishers will be asked to provide a breakdown of prices at a publisher level, and when possible on a journal level.

    To support more transparency, "The journal/platform must provide, on its website, a detailed description of its editorial policies and decision-making processes. In addition, at least basic statistics must be published annually, covering, in particular, the number of submissions, the number of reviews requested, the number of reviews received, the approval rate, and the average time between submission and publication."

    cOAlition S also seeks to encourage governments, universities, research organisations, libraries, academies, and learned societies to align their strategies, policies, and practices to ensure transparency.

11. cOAlition S reiterates its support for non-APC models and a range of forms of innovative Open Access platforms and other well-established delivery mechanisms for immediate OA and will consider providing collective financial support here when needed.

12. cOAlition S is making a concerted action to limit OA costs for researchers from middle-income and low-income countries by developing guidelines for discounting and waiving publication charges. Furthermore, journals/platforms must provide waivers and discounts for such countries or for other authors with demonstrable needs. Importantly, statistics on waivers requested and granted must also be provided.
    Related to this, payment of publication fees or waiver status must not in any way influence the editorial decision-making process on the acceptance of a paper.

13. Though cOAlition S funders state that they do not support hybrid publishing, the principle to not accept hybrid publishing outright has been removed. Instead, funders are allowed to support hybrid publishing as part of temporary transformative agreements whilst individual researchers, research institutions, other funders, and governments are urged not to financially support it otherwise.

14. Transformative agreements will be supported until the end of 2024. cOAlition S will use 3 strategies: transformative agreements, transformative model agreements and transformative journals. For example, transformative agreement model contracts will aid learned society presses and small- and medium-sized publishers as they flip to OA. Furthermore, cOAlition S "will only financially support agreements after 1 of January 2021 where they adhere to the ESAC Guidelines".

15. In the Guidance on the Implementation, cOAlition S clarifies specifically what it will and will not pay for in opening access to research.

16. A new principle has been added articulating the commitment of cOAlition S funders to assess research outputs during funding decisions based on their intrinsic value, not considering journal metrics such as the impact factor, the publication channel or publisher. cOAlition S members will implement such principles in their policies by January 2021.

17. cOAlition S also acknowledges the "importance to early-career researchers that employing institutions commit to revise their (research assessment) procedures and take that forward to implementation in the transition of Plan S".

18. Several of the compliance requirements for OA platforms, journals and repositories have been downgraded. Specifically, the requirements for repositories mainly focus on the inclusion of high quality interoperable non-proprietary format metadata for articles under a CC0 license, persistent identifiers for deposited versions, machine-readable licenses, OA access status, license status, and funder information. It also calls for 99.7% repository up-time.

    Strongly recommended criteria for repositories include manuscript submission systems that support both individual author uploads and bulk uploads, full text stored in JATS XML for example, PID support such as ORCID, open citation data (I4OC), Open API, OpenAIRE metadata compliance, and QA to link FT with bibliographic metadata.

    These are subject to review in 2024 and may then become mandatory. For more on other technical requirements, [download them here](#).

19. cOAlition S will work with certain services to establish mechanisms to monitor OA compliance in the Implementation Guidance, e.g. the Directory of Open Access Journals (DOAJ), the Directory of Open Access Repositories (OpenDOAR), SHERPA/RoMEO, (ESAC). cOAlition S will also support "the development of a tool that researchers can use to identify whether venues fulfil the requirements".

20. By the end of 2024, cOAlition S will have concluded a formal review of the requirements, effects and impact of Plan S, paying particular attention to the effect of transformative agreements and making subscription journals open via repositories.

2.   The 10 Plan S principles

KEY PRINCIPLE

Original text: After 1 January 2020, scientific publications on the results from research funded by public grants provided by national and European research councils and funding bodies, must be published in compliant Open Access journals or on compliant Open Access platforms.

Revised text: "**With effect from 2021, all scholarly publications** on the results from research funded by public **or private grants** provided by national, **regional and international** research councils and funding bodies, must be published in *("compliant" deleted)* Open Access Journals, on Open Access Platforms, **or made immediately available through Open Access Repositories without embargo**."[1]

Analysis

- The date of commencement has been delayed by one year to 2021 to allow for researchers, institutions, repositories, and publishers to adapt to Plan S specifications. This allows more time to implement the principles for a range of stakeholders and improving the odds for achieving greater success. Related to this point, the implementation guidelines specify that cOAlition S members "must apply the Plan S principles at the latest in calls published, or application deadlines, after 1 January 2021." It furthermore encourages members to implement the Plan S principles on all grants awarded after January 2021 providing clear instructions on when and how this should be enforced by cOAlition members.

- Instead of scientific publications, scholarly publications are mentioned which clarifies that publications from across all disciplines are within purview.

- This now includes research from public as well as private grants extending the scope of potential material to be made OA.

- The revised principle furthermore now includes a wider range of funders including international research councils and funding bodies that are outside of Europe to be more inclusive of other regions as well as regional bodies. This in turn also has the potential to unlock more OA.

- The main principle now also provides the option for immediate deposit in OA repositories without embargo. We are pleased to see that repositories are included as equal and legitimate mechanisms for compliance, and that no embargoes are permitted, thereby accelerating access to research also through repositories.

- Small note: The word "compliant' has been removed, which is now redundant since compliant venues are listed.

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[1] Note that the plain text is the original principle and below this is the revised text with changes in bold.

THE 10 PRINCIPLES

Original text: 1.   Authors retain copyright of their publication with no restrictions. All publications must be published under an open license, preferably the Creative Commons Attribution Licence CC BY. In all cases, the license applied should fulfil the requirements defined by the Berlin Declaration;

Revised text: 1.   Authors **or their institutions** retain copyright to their publications *(with no restrictions – deleted).* All publications must be published under an open license, preferably the Creative Commons Attribution license (CC BY), **in order to** fulfil the requirements defined by the Berlin Declaration;

Analysis

- Authors or their institutions must now retain copyright which better reflects the way that copyright is managed in different institutions and nations. In the RfR, cOAlition S also asserts that "a wider adoption of rights retention approaches, at the institutional level and even at the level of national laws, is called for" which SPARC Europe strongly endorses. It is important that the institution has clear rights to re-use material in addition to the author, e.g. in cases where authors leave an institution.

- The RfR further states that "we recognise the work done by initiatives such as the Harvard Individual Open Access licence or, in the UK, with the UKSCL Model Institutional Open Access Policy." SPARC Europe welcomes looking at a range of options to retain copyright.

- COAlition S also commits to developing mechanisms "to ensure that no author needs to negotiate individually with publishers the right to make an article Open Access." This supports SPARC Europe's view to make the retention of rights as easy as possible.

- The principle is framed well in the Guidance in Implementation; cOAlition S funders commit to granting the public worldwide "royalty-free, non-exclusive, irrevocable license to share … and adapt … the article for any purpose, including commercial, provided proper attribution is given to the author."

- cOAlition S is also intent on providing mechanisms by developing or adopting a model 'License to Publish' for their grantees to ensure that no author needs to negotiate individually with publishers to make an article OA

- While cOAlition S continues to recommend CC BY in the principles, the Implementation Guidance goes further requiring "the use of the Creative Commons Attribution (CC BY) 4.0 license by default." with secondary alternatives being the CC BY-SA 4.0 license and CC0. It also allows CC BY-ND for certain articles on request and with justification by the grantee. The rationale for changes also states that "we recommend that funders should be willing to consider an exemption from the requirement for a CC BY license to allow the use of CC BY-ND on a case-by-case basis" to support the SSH community in particular. This data should be included in article metadata.

- To protect third-party content from illegal exploitation, the guidance specifies: "Third-party content included in a publication (for example images or graphics) is not affected by these requirements". A preferable alternative, considering issues commonly encountered by SSH authors, would have been to require approval for third party material before openly licensing it effectively ensuring access to SSH material.

- Small note: "With no restrictions" has been deleted from the original principle since it is redundant.

Original text: 2. The Funders will ensure jointly the establishment of robust criteria and requirements for the services that compliant high-quality Open Access journals and Open Access platforms must provide;

Revised text: 2. The Funders *(ensure jointly – deleted)* will **develop** robust criteria and requirements for the services that *(deleted - compliant)* high-quality Open Access journals, Open Access platforms, **and Open Access repositories must provide**;

Analysis

- Not all signatories of Plan S need to collaboratively develop criteria in future thereby potentially contributing to the acceleration of the implementation of Plan S.

- The principle now specifies OA repositories as a venue for OA publication, which endorses the value of repositories.

Original text: 3. In instances where such high-quality Open Access journals or platforms do not yet exist, the Funders will, in a coordinated way, provide incentives to establish and support them when appropriate; support will also be provided for Open Access infrastructures where necessary;

Revised text: 3. In **cases where** high-quality Open Access journals or platforms do not yet exist, the Funders will, in a coordinated way, provide incentives to establish and support them when appropriate; support will also be provided for Open Access infrastructures where necessary;

Analysis

No substantive changes.

Original text: 4. Where applicable, Open Access publication fees are covered by the Funders or universities, not by individual researchers; it is acknowledged that all scientists should be able to publish their work Open Access even if their institutions have limited means;

Revised text: 4. Where applicable, Open Access publication fees are covered by the Funders or *(universities – deleted)* research institutions, not by individual researchers; it is acknowledged that all r**esearchers** should be able to publish their work Open Access *(even if their institutions have limited means – deleted)*

Analysis

- In summary: no substantive changes.
- "Universities" have been replaced with "research institutions" to broaden the scope of those who would cover OA fees, which is in keeping with the importance of

including all stakeholders who are engaged in producing research among those held accountable for the costs of making their material widely available.

- The word "scientists" has been replaced with "researchers" to be more explicit about being inclusive of all disciplines.

- The words "even if their institutions have limited means" have been removed. On the positive side, this imposes less pressure on those institutions whose financial means might limit them from contributing to OA whereas the negative consequences might result in reduced access to material from less affluent institutions in the long run. This could also be read as a redundancy of words since all researchers should be able to publish OA.

Original text: 5. When Open Access publication fees are applied, their funding is standardised and capped (across Europe);

Revised text: 5. The Funders support the diversity of business models for Open Access journals and platforms. When Open Access publication fees are applied, they must be commensurate with the publication services delivered and the structure of such fees must be transparent to inform the market and funders potential standardisation and capping of payment of fees.

Analysis

- The demand to standardise and cap APCs has been diluted in the new principle; an important cost-control mechanism. This has been replaced with demands for fair pricing mechanisms relative to the service offered, and also favours greater transparency related to fees. While greater transparency is important (as mentioned in the RfR and Implementation Guidance), as regards fees being commensurate, this leaves significant room for interpretation which could lead to uncertainty among the community around pricing levels.
  The Guidance on Implementation is clear that since cOAlition S will work on gaining transparency on costs as well for various services such as triaging, peer review, editorial work, copy editing that "cOAlition S will thereby contribute to establishing fair and reasonable prices for publishing services, including equitable waiver policies, that reflect the publishing costs."
  No information is provided on how this will be measured or enforced, which will be critical for getting and keeping costs down.

- cOAlition S states that this transparency will inform the market and funders to aid efforts to standardise and cap fees in future. The RfR states that they "may at a later time decide to implement publishing costs caps in a coordinated way if unreasonable levels are observed." The RfR also states that individual members of cOAlition S may decide to standardise or cap prices themselves earlier however. This is a positive step and we hope to see close liaison between cOAlition S and paying institutions during the decision-making process.

Original text: 6. The Funders will ask universities, research organisations, and libraries to align their policies and strategies, notably to ensure transparency;

Revised text: 6. The Funders **encourage governments,** universities, research organisations, libraries, **academies, and learned societies** to align their strategies, policies, **and practices,** notably to ensure transparency.

Analysis

- This principle, which already encouraged the alignment of policies and strategies now also includes practices to help streamline the implementation of OA to research output across cOAlition S. However, this softens the previous principle since "ask" has been changed to "encourage".

- The principle now includes a wider range of institutions to be more inclusive of the types of organisations that contribute to the research environment, which would give rise to greater access to more OA from a wider range of institutions in the long run.

Original text: 7. The above principles shall apply to all types of scholarly publications, but it is understood that the timeline to achieve Open Access for monographs and books may be longer than 1 January 2020;

Revised text: 7. The above principles shall apply to all types of scholarly publications, but it is understood that the timeline to achieve Open Access for monographs and **book chapters will** be longer **and requires a separate and due process;** *(than 1 January 2020 – deleted)*

Analysis

- In summary, no substantive change.
- The inclusion of book chapters in the revised principle clarifies their inclusion as a compliant OA output.
- The principle still delays addressing books or monographs, though the Guidance on the Implementation does designate the close of 2021 as the point when Plan S principles apply to monographs and book chapters.

Original text: 8. The importance of open archives and repositories for hosting research outputs is acknowledged because of their long-term archiving function and their potential for editorial innovation;

Analysis

Original principle 8, has been deleted since repositories are now taken on a par with OA jorunals and platforms in principles and guidance.

Original text: 9. The 'hybrid' model of publishing is not compliant with the above principles;

Revised text: **9. The Funders do not support** the 'hybrid' model of publishing. **However, as a transitional pathway towards full Open Access within a clearly defined timeframe, and only as part of transformative arrangements, Funders may contribute to financially supporting such arrangements;**

Analysis

- Whereas the original principle states that hybrid publishing is not accepted – an important cost-control mechanism in the former principles – the revised principle states that funders may now, in fact, support hybrid publishing as part of temporary transformative agreements. The Implementation Guidance takes this a step further urging funders not to fund hybrid unless encompassed by such agreements: "cOAlition S urges individual researchers, research institutions, other funders, and governments not to financially support 'hybrid' Open Access publishing when such fees are not part of transformative arrangements." This does not change the nature of hybrid publishing, but rather continues the status quo and forces libraries to enter into transformative agreements for hybrids.

- In the RfR and Implementation Guidelines, the end of 2024 is stated as the endpoint to allow for a smooth transition to OA for existing publishers and journals "under specified conditions" not declared in the documentation. This prolongs the contentious hybrid model, which scores of institutions do not support. However, this deadline does confirm that funders consider this a temporary solution, meaning that publishers will need to have other models in place by then. cOAlition S and other stakeholders will need to work with publishers to work on ensuring that new models are in place by that time. The RfR also, unfortunately, states that it does not see evidence that hybrid journals have not delivered timely immediate OA. We do not refute this fact, but this point misses the main concern of institutions regarding double-dipping where customers pay twice for one and the same OA article.

- When publishing hybrid in a subscription journal is not bound to a transformative agreement, funders will neither reimburse nor pay for the costs of such publication. They only way to be compliant with those principles will be through the immediate deposition of the VoR in a compliant repository under a CC BY license and with retention of copyright.

- Note that the RfR states that "more options for transitional arrangements (transformative agreements, transformative model agreements, 'transformative journals') are supported" providing more flexibility for those engaged in this change. For example, we welcome the active exploration of transformative agreement model contracts to support learned society presses and small- and medium-sized publishers in flipping to OA. What will be important here is for cOAlition S to engage with a balanced set of stakeholders before recommending certain models, including libraries.

- Furthermore, cOAlition S "will only financially support agreements after 1 of January 2021 where they adhere to the ESAC Guidelines."

Original text: 10. The Funders will monitor compliance and sanction non-compliance.

Revised text: 10. The Funders will monitor compliance and sanction non-**compliant beneficiaries/grantees;**

Analysis

- This principle now specifically adds those who will endure the negative consequences of non-compliance with Plan S principles. It thereby further highlights the personal risk of non-compliance to the researcher as grantee or beneficiary, which may urge greater compliance.

- The implementation guidance also states that cOAlition S members will align their grant agreements or contracts with Plan S and that compliance will be monitored and non-compliance sanctioned. Possible sanctions are named, e.g. "withholding grant funds, discounting non-compliant publications as part of a researcher's track record in grant applications, and/or excluding non-compliant grant holders from future funding calls." These measures will further stimulate greater compliance.

New 10   **The Funders commit that when assessing research outputs during funding decisions they will value the intrinsic merit of the work and not consider the publication channel, its impact factor (or other journal metrics), or the publisher**

Analysis

- This new principle embraces the notion that the research reward and incentive system needs reforming by specifying that funding decisions should be made on the intrinsic merit of the work and even goes so far as to say that neither the publication channel, nor its impact factor (or other journal metrics), nor the publisher may be considered in such funding decisions. cOALition S funders commit to reviewing their research assessment processes, which is likely to have broader consequences on the way that research is evaluated in future by others. We would appreciate it were cOALition S to share these evaluation guidelines. The Guidance on Implementation further states the commitment of cOAlition S members to implement this in their policies by January 2021.

- As specified in the Rationale, cOAlition S clearly endorses and commits to the San Francisco Declaration on Research Assessment (DORA) or the Leiden Manifesto and also commits to working with other groups, such as the National Academies of Science in the United States, that are intent on reforming the rewards and incentive system. They also acknowledge the "importance to early-career researchers that employing institutions commit to revise their procedures and take that forward to implementation in the transition of Plan S" although it is not specified as to how cOAlition S will support this change, e.g. in individual institutions.

3.   Guidance on the implementation of Plan S

This section highlights elements of the Guidance on the Implementation that are not otherwise explained in the cOAltion rationale (below) or in the principles.

SPARC Europe very much welcomes it that Plan S also "strongly encourages that research data and other research outputs are made as open as possible and as closed as necessary. The early sharing of research results through preprints is also strongly encouraged" endorsing the importance of access to more than journal articles.

Funders have also clarified where they will pay for opening access (from the Guidance):

	Open Access publishing venues (journals or platforms)	Subscription venues (repository route)	Transition of subscription venues (transformative arrangements)
Route	Authors publish in an Open Access journal or on an Open Access platform.	Authors publish in a subscription journal and make either the final published version (Version of Record (VoR)) or the Author's Accepted Manuscript (AAM) openly available in a repository.	Authors publish Open Access in a subscription journal under a transformative arrangement.
Funding	cOAlition S funders will financially support publication fees.	cOAlition S funders will not financially support 'hybrid' Open Access publication fees in subscription venues.	cOAlition S funders can contribute financially to Open Access publishing under transformative arrangements.

Plan S also now more clearly defines what an OA platform includes, which are publishing platforms for the original publication of research output such as Wellcome Open Research or Gates Open Research. OA compliant platforms do not aggregate or re-publish already published material. Demystifying certain important publishing venue terms will result in an easier adoption of the principles by funders, publisher, research and scholarly communications communities.

On compliance

cOAlition S will work with certain services to establish mechanisms to monitor OA compliance in the Implementation Guidance, e.g. the Directory of Open Access Journals (DOAJ), the Directory of Open Access Repositories (OpenDOAR), SHERPA/RoMEO, Efficiency and Standards for Article Charges (ESAC). This, and the news that cOAlition S will support "the development of a tool that researchers can use to identify whether venues fulfil the requirements" will make things easier for researchers to comply.

On repositories

Implementation Guidance also "strongly encourages the deposition of all publications in a repository, irrespective of the chosen route to compliance. Several cOAlition S members require deposition of all attributed research articles in a repository." We very much welcome this addition, since funders now very much stimulate the deposition of content into repositories.

4.   Technical Guidance and Requirements

Several of the compliance requirements for both journals and repositories have been reduced. For a complete analysis, download them here.

The implementation requirements for compliant repositories are now much less onerous than in the original draft, and should be fairly manageable for repositories to implement. The requirements mainly focus inclusion of high quality interoperable non-proprietary format metadata for articles under a CC0 licence, persistent identifiers for deposited versions, machine-readable licences, OA access status, license stats, and funder information. It also calls for 99.7% repository up-time and we welcome this and expect this to strengthen repository offerings.

Strongly recommended criteria for repositories include manuscript submission systems that support both individual author uploads and bulk uploads, full text stored in JATS XML for example, PID support such as ORCID, open citation data (I4OC), Open API, OpenAIRE metadata compliance, and QA to link FT with bibliographic metadata. These will strengthen and future-proof repositories.

These are subject to review in 2024 and may then become mandatory.

For more on other technical requirements, download the complete comparison here.

5.   Rationale for the Revisions Made to the Plan S Principles and Implementation Guidance

cOALition S's rationale (RfR) describes the reasoning behind the adopted changes, which are analysed in more detailed under the Principles. In short, from the rationale:

"The revised Plan S maintains the fundamental principles

- No scholarly publication should be locked behind a paywall;

- Open Access should be immediate i.e., without embargoes;

- Full Open Access is implemented by the default use of a Creative Commons Attribution CC BY licence as per the Berlin Declaration;

- Funders commit to support Open Access publication fees at a reasonable level;

- Funders will not support publication in hybrid (or mirror/sister) journals unless they are part of a transformative arrangement with a clearly defined endpoint."

We have selected additional elements of interest from the RfR below:

- "Plan S is NOT just about a publication fee model of Open Access publishing. cOAlition S supports a diversity of sustainability models for Open Access journals and platforms." SPARC Europe welcomes this since this clarifies that Plan S calls for open access to a broad scope of scholarly publication models thereby embracing diversity and innovation.

- cOAlition S reiterates its support for non APC models or "Diamond Open Access" and a range of forms of innovative Open Access platforms and other well-established delivery mechanisms for immediate OA and will consider providing collective

financial support here when needed. The Implementation Guidance also goes further to say that it is conducting a gap analysis across disciplines to expand the share of OA journals or platforms. cOAlition S will also develop incentives for establishing these, in particular, where needs and gaps exist. This shows a further commitment to supporting innovation in the scholarly communication sector.

- When making an article published in a subscribed journal available in a repository, immediate access can be realised either through the Author-Accepted Manuscript (AAM) or Version of Record (VoR).
"The deposition of the AAM or VoR without an embargo in repositories is one route to compliance, and forms the only route to compliance for publications in subscription journals that are not under transformative agreements". We very much embrace these new requirements since they have the potential to increase Open Access to research through repositories. It also makes repositories the mandatory route of deposit for subscription journal articles not under transformative agreements, recognising the importance of the repository in scholarly communication.

  As also stated in the Implementation Guidance, SPARC Europe strongly endorses the introduction of a mandate for "License to Publish" granted to publishers who "must allow the author/institution to make either the Version of Record (VoR), the Author's Accepted Manuscript (AAM), or both versions available under an open license (as defined below) via an Open Access repository, immediately upon publication." This must be at no extra cost. Furthermore, cOAlition S members now commit to ensuring that authors or institutions retain copyright as well as the rights that are necessary to make a version (either the VoR, the AAM, or both) immediately available under an open license specified in their funding contracts or agreements – where possible. cOAlition S will develop or adopt a model 'License to Publish' for their grantees which will simplify the path to copyright retention; we strongly support this move.

- We welcome the acknowledgment of the concerns of learned societies and cOAlition S's commitment to further exploring the real and perceived transitional risks. This will help accelerate OA to the scholarly work of learned societies.

- cOAlition S quells concerns about the quality of OA publications by stating that it "disagree(s) fundamentally with the notion that Open Access publishing is associated with lower quality"; this is particularly powerful considering the source of the statement being cOAlition S funders.

- As regards cOAlition S financing OA, "cOAlition S funders will financially support publication fees for Open Access publishing venues and will collectively establish incentives for establishing Open Access journals or platforms. At the discretion of our members, funding may be provided for transformative arrangements." The rationale also states that cOAlition S is now taking action by "developing guidelines for discounting and waiving publication charges for researchers from middle-income and low-income countries", which we welcome to limit costs and to support low or underfunded researchers. Furthermore, journals/ platforms must provide such waivers and discounts to such countries or to other authors with demonstrable needs. Importantly, statistics on waivers must also be provided (both requested and granted), which we strongly endorse to demonstrate how far publishers are following through on this point.

- We support it that by the end of 2024, cOAlition S will have concluded a formal review of the requirement, effects and impact of Plan S. This review will pay particular attention to the effect of transformative agreements and making subscription journals open via repositories.

6.   Next steps for SPARC Europe

SPARC Europe's Board will meet in late June to discuss the next implementation steps for Plan S and will feed this back to the community. In the summer we will provide an overview on what the new Plan S now means for libraries, and how SPARC Europe will commit to supporting the Open Access community in implementing Plan S.

7.   References

- [The revised principles and implementation guidance as of 30 May 2019](#)
- [The Rationale for the Revisions Made to the Plan S Principles and Implementation Guidance](#)