

Response of the DFG (German Research Foundation) on the implementation document regarding Plan S

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

1. The guidance document specifies that there is no preference for open access models, yet underestimates the effect, which an open access mandate has for different disciplines. It is improbable that large publishers will allow for an immediate deposit of subscription journal articles in repositories under a CC-BY license, therefore some disciplines might encounter difficulties regarding these regulations. Moreover, there should be a possibility to use other CC-licenses except CC-BY. Furthermore, the issue of third party content is not clearly addressed and a mandate will therefore disadvantage some disciplines, especially in the Humanities. Unclear remains the handling of third party content. Is it really intended that a variety of publishing licenses be used within one document?

From our perspective, the role of preprints for scholarly communication is not respected adequately in the implementation document. Preprints are open access documents that are very useful for the sciences and humanities and indeed are increasingly coupled with new mechanisms of quality assurance or are validated by peers after publication. From our point of view, an anachronistic view of pre-publication peer review should not dominate the open access vision of Plan S. Plan S should be open to include a more adequate notion of quality assurance and not only stick to peer review. This seems all the more important considering the question of research evaluation and DORA, i.e. the assessment of research on its own merits, that are part of Plan S. Pre-publication peer review is very much a practice tied to the print age and has led to confounding these processes, the value of a journal, its metrics and their relevance for research. Furthermore, the issue of versions (AAM or VoR) and the confusion resulting should be minimized. Rather, it could be useful to simply require a clear statement on the status of a publication (non peer reviewed, peer reviewed).

Regarding the issue of hybrid journals, it is unclear how agreements can contain clear transformation strategies for the journals. In our experience, it is quite impossible to obtain concise commitment from profit-oriented publishers.

It remains unclear what the study on publication costs will ascertain, what its scope will be and how a price cap will be defined. Clarity on this issue would be of utmost importance to the research funding system. Moreover, what will the regulation on transparency of costs and surplus entail? Will commercial publisher be ready to adhere to these criteria or might this be against competition law to enforce such a rule?

The proposed gap analysis on research areas lacking appropriate open access outlets seems rather top down and insinuates that there can be a steering (by funders) regarding this issue. It should be in the interest and left to research communities to establish adequate outlets.

The proposed timeline for an evaluation of the effects of Plan S on scientific cooperations seems to be terminated too early, especially considering the timeline (under point 5) regarding the implementation of Plan S regulations in grants or calls for proposals.

It remains unclear, how and by whom low-income countries will be defined.

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

2. Regarding further or alternative mechanisms, funders engaged in cOAlition S might want to consider establishing publicly controlled and financed infrastructures for the publication of research results from their funding. There is a lot of criticism from scientists regarding a strong focus on APC-funded Open Access and concern that a new cost crisis will occur. Further, the economic aspects might become too dominant regarding the choice of publication outlet and the possibilities to publish, to the disadvantage of individual scholars of institutions disposing of fewer funds. Therefore, the establishment of publicly financed and community-organized publication routes might pose a future alternative focusing on the dissemination of quality research and restituting the primary aim of scholarly communication to its core.