



Guidance on the Implementation of Plan S- Feedback Questions

Royal Irish Academy Response to Consultation Questions

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

The Royal Irish Academy supports the idea of science as a global public good and is broadly welcoming of the principles of Open Science. However, we also support the recent statements made in the response (attached) by ALLEA (All European Academies) to Plan S which states that a move to full open access must be accompanied by concurrent reforms of the systems for research evaluation and career progression, particularly early career researchers.

In relation to the question of issues with the guidance document:

- More clarity is needed on several aspects of the implementation of Plan S. The current specifications for compliant repositories are too narrow and prescriptive and will prove to be difficult for many current repositories to meet. The current requirements mean that Plan S may have the unintended consequence of pricing institutional repositories out of the market.
- Issues pertaining to intellectual property rights require further clarification and further consultation with the research community before a licensing model is agreed on.
- The current stated timeline of full open access by January 2020 is also likely to pose problems as it is unlikely that it allows sufficient time for the research community to be prepared for this transformative move in research publication.
- Limited exemptions allowing for exceptional cases must be introduced e.g. for sensitive research areas such as security.
- As mentioned above, concerns persist as to how Plan S might further disadvantage Early Career Researchers particularly in relation to how this will affect their career progression and ability to publish. Transitions to an open research environment must be accompanied by simultaneous reform of the systems for research evaluation and career progression.
- The case for scholarly books and text-books is more complicated than the current provisions in Plan S allow for. They should be excluded from the plan until further consideration is given to this area.

- The initial focus of implementing Plan S should be on the larger publishers. Smaller publishers who fall under an agreed annual revenue threshold should be exempt for an extended period of time to allow them to make this transition.
- Further details are needed as soon as possible regarding likely open access publication costs and fees to help inform this discussion. There is currently a risk that some smaller publishers may have to contract or cease their operations which would have the undesirable effect of diminishing the range of established platforms available to researchers.
- A clear strategy in relation to the funding of APCs must be identified and communicated. A risk assessment of Plan S, particularly in relation to the financial impact on all stakeholders, must be carried out immediately.

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

- At present, many researchers remain unaware of Plan S. This must be rectified immediately to allow the research community to prepare for the change in open access requirements. A comprehensive and sustained communications campaign is required from all funders to ensure that researchers are brought up to speed on the plan.
- Open access must promote rigorous peer review to ensure research integrity. Coalition S must put in place reliable and comprehensible indicators of quality and trustworthiness attached to research outputs. This could include next generation metrics to guide and promote a greater culture change required to support open science. Open access publishing offers more scope to have a nuanced form of peer review with community ranking as it more flexible than traditional publication. This is a crucial element of open access and must be incentivised and implemented.
- The funding institutions must outline how they will support and fund open access. They also must commit to resourcing open access adequately and make it clear to the research community how they intend to do this.

The Royal Irish Academy, as part of the All European Academies (ALLEA) network fully endorses the ALLEA response to Plan S which was lead authored by Prof. Luke Drury, MRIA. https://www.ria.ie/sites/default/files/allea_response_to_plan_s_1.pdf

The Academy also lends it's support to the British Academy response to Plan S. https://www.thebritishacademy.ac.uk/sites/default/files/British_Academy_paper_on_Plan_S_Guidance.pdf