The French Committee for Open Science has published a short reply to the online consultation run by the cOAlition S on the Guide for the implementation of Plan S published at the end of November 2018. The ANR contribution includes the main points of this text and adds the funder’s point of view.

1. What are the points which are not clear enough or issues which have not been covered in the implementation guidance?

- On the consideration of disciplines

COAlition S members should work together with learned societies and / or communities to take disciplinary specificities into account like scientific communication, editorial and publishing practices, and evaluation. These should be integrated in the implementation details of Plan S and also be consistent with its principles.

The survey which will be commissioned by cOAlition S on APCs and the APC caps that may result should consider this disciplinary dimension.

- On phasing Plan S implementation

The current timeline may exclude many publishing and archiving platforms which do not have the means to comply with demanding technical requirements in such a short period of time. We recommend that the compliance criteria provided in points 9.1 and 10.1 should be required as soon as from 1st of January 2020. Some of those provided in points 9.2 and 10.2 are too technical with the risk of being counterproductive similar format should be accepted as well.

- On CC-BY and licensing

Widespread distribution under CC-BY or CC-BY-SA open licenses should be preferred. However, it could be useful to accept CC-BY-NC licenses for a short period, to leave sufficient time for the cOAlition members to work with the publishers on establishing compliant amendment templates and agreements and for instructional work to be done among researchers about the use of these amendments and open licenses.

Finally, it should also be ensured that licenses associated with publications and those with data be in line.
- On technical constraints

Imposing more technical constraints on open repositories than on journal platforms is not consistent.

- On making full text available in XML-JATS

The objective of storing full text in XML-JATS or similar formats is in line with the FAIR principles in terms of editorial content reusability, interoperability, sustainability and property. It also opens up facilitating and qualitative avenues for TDM.

However, it is necessary to draw up a timeline and procedures for the technical compilation of native files, their contractual retrieval from publishers, especially as part of negotiations, and for their availability, in particular when deposits are made by authors in an open repository (self-archiving).

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

- On open citations

The open availability of citation data in compliance with I4OC standards should be included in the mandatory quality criteria for journals and platforms (point 9.2) and not in the additional quality criteria (point 9.3).

- Coalition S should provide a study on the current laws regarding copyright, license, rights-retention in order to better understand the constraints of coalition’s members to find a way for each country to become compliant with the goal of the zero embargo period. For a transition period it could be useful to accept the same period as the EC: “beneficiaries can deposit the final peer-reviewed manuscript in a repository of their choice. They must ensure open access to the publication within at most 6 months (12 months for publications in the social sciences and humanities).”