

The Canadian Association of Research Libraries' members include Canada's twenty-nine largest university libraries as well as two national libraries. Enhancing research and higher education are at the heart of its mission. CARL develops the capacity to support this mission, promotes effective and sustainable scholarly communication, and public policy that enables broad access to scholarly information.

Response from CARL to the Plan S Implementation Guidance:

The Canadian Association of Research Libraries (CARL) is committed to moving scholarly publishing towards maximum openness to advance innovation and sustainability of the system, while also ensuring that costs are controlled to maximize investment within the academy. CARL welcomes Plan S, a decisive commitment to achieve immediate open access for all publications stemming from research funded by its member organizations.

Scholarly communication is global in nature, and Plan S will have a significant impact on scholarly publishing, both in the signatory countries and in other regions including Canada. To that end, CARL appreciates the opportunity to offer some reflections and recommendations regarding the Plan S Implementation Guidance.

Journals and Platforms

The proposed Plan S requirements for journals/platforms would significantly improve accessibility and increase re-use of research articles. However, one of the unintended consequences of these requirements may be to disadvantage smaller journal publishers, including some Canadian journals that publish research articles written by scholars from around the world.

CARL supports the recommendations of [LIBER's Open Access Working Group](#)

"that support be granted to help journals based in the academy achieve these goals, or that at minimum, there be a transition period for them to implement these changes".

Open Repositories

CARL firmly believes in the central role played by the international network of open repositories in ensuring access to research and fostering new models of scholarly communication. CARL welcomes Plan S's recognition of repositories and their role "to ensure long-term archiving, research management, and to support maximum re-use." However, CARL agrees with the statement made by [the Harvard Library and MIT Libraries](#) that by not including access in this list of roles provided by repositories, "the current Plan provides an incomplete picture of the benefits of OA repositories."

In addition, we are concerned about the list of requirements with which repositories would be required to comply under Plan S. It is unlikely that any repository other than the most well-funded would be able to provide the full functionality described in the current guidance document.

CARL supports the recommendations of [the Confederation of Open Access Repositories \(COAR\)](#) and echoes its suggestion that some of the Plan S requirements “*will create artificial barriers to the participation of universities and other research organizations in the scholarly communication system.*”

Author Rights

The stipulation that authors must retain copyright over their work is welcome. However, we believe that authors should be given the right to choose a broader range of Creative Commons licences, including the Non-Commercial option (CC-BY-NC), which would allow authors to ensure their articles are not re-packaged and sold for commercial gain by others.

CARL recommends that authors be allowed to select the Creative Commons license of their choice in making their work available in any open access venue.

CARL keenly awaits the results of the “independent study on Open Access publication costs and fees” as well as the “gap analysis of Open Access journals/platforms to identify fields and disciplines where there is a need to increase the share of Open Access journals/platforms.” These two reports will be important contributions to international discussions on sustainable models for open access.