



ROYAL NORWEGIAN MINISTRY OF
EDUCATION AND RESEARCH

UNESCO Secretariat

Your ref

Our ref

Date

20/3990-16

16 December 2020

Draft Recommendation on Open Science - Comments and Observations from Norway

Norway is grateful for the opportunity to comment on the first draft of the UNESCO Recommendation on Open Science. International cooperation is an absolute necessity in order to achieve the goals of Open Science and we would not have been where we are today without it. As a truly global organization, UNESCO can undoubtedly play an important role, and Norway welcomes the proposed Recommendation.

Our overall impression is that of a well thought-through set of recommendations. The aims, the core values and the principles are sound and easy to agree upon and the definitions cover all the important aspects of Open Science. The proposed areas of action are focused on the issues we perceive to be the central ones, and the individual actions are understandable and possible to implement.

We provide comments under two headlines: On one hand we point to some issues that are already well covered and that we believe should be given high priority, and on the other hand we offer suggestions for adjustments in some areas we believe could be further improved or clarified.

Issues of high priority

In paragraph 11, the first objective of Open Science listed is “maintaining and promoting good practice and scientific rigour”. We strongly support having this as the primary objective. Maintaining quality is an absolute must, and we agree to the idea of Open Science supporting this.

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We also applaud action point 19 (h). Providing legal instruments to allow for sharing is often complicated, but very effective.

The third point we want to emphasize is action point 19 (j). We believe that good funding and investment policies will be vital in the transition to Open Science. The transition from paying for access to paying for publication will change the business model of publishers and must also lead to a shift in public funding streams. Likewise, funding needs for infrastructure seem to be close to infinite if not well planned.

Suggestions for adjustments

The proposed actions make it very clear that the aim of the Recommendation is not only access to but also reuse of scientific knowledge. We believe it would be of value to make this clear in the aims in Section I. We therefore propose to change the first aim to read “Universal access to and reuse of scientific knowledge ...”.

Similarly, we suggest changing the third line of paragraph 8 to read “... freely available, accessible and reusable for everyone, ...”

In paragraph 9, in the definition of Open Access, the most open variety is described. More specifically, “all users are granted free, irrevocable, worldwide rights to access, copy, retain, use, distribute, transmit and display the work publicly and to make and distribute derivative works, in any medium for any responsible purpose.” Likewise, in paragraph 13, the use of Creative Commons licenses is described. While we support the most open version of CC licences as the norm, we believe the amendment made by cOAlition S to allow for the use of CC-BY-ND in specific cases, to be a wise move. Particularly in some parts of the humanities and social sciences, this allows researchers to move to open access without the fear of misuse of their works.

In paragraph 11, point (ii), we suggest changing the wording to “maximizing and simplifying access to ...”. It is imperative to maximize access, but it is equally important to do so in a way that makes it easy for researchers to adhere to the recommendations and policies of Open Science. If making your data FAIR or storing them safely implies a heavy extra administrative burden, researchers are more likely to choose less appropriate alternatives.

In paragraph 12, we suggest adding students as an actor. We suggest adding this part after Researchers, Leaders and Educators. The description might be:

(iv) Students, who benefit from Open Educational and Scientific resources and who increasingly also contribute to research by their performance of and participation in research projects.

We also suggest adding students to paragraph 16, point (b), i.e. change the wording to “all researchers, students and societal actors, ...”

In paragraph 19 i) public-private partnerships are encouraged, provided that vendor lock-in and predatory behaviour is avoided. The definition of Open Infrastructures, however, states that "Open Science infrastructures should be non-profit and they should guarantee permanent and unrestricted access to all public". We believe it would be helpful to describe this more clearly, as it might be perceived as a contradiction. We do agree that essential parts of the Open Science Infrastructure should be non-profit, but we also believe that services on the outskirts of the infrastructure could be for-profit, as long as the market is functioning, i.e. institutions have a real choice as to whether or not they procure those services.

Finally, in paragraph 25 we suggest adding an action point on international collaboration on metrics for monitoring Open Science. Monitoring in the individual member states is one thing, monitoring the same things in the same way paves the way for more valuable monitoring. It may not be possible to agree on everything, but some common metrics will still be an improvement.

Yours sincerely

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This document is signed electronically and has therefore no handwritten signature

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