

Ms Silvana Muscella  
Chair of the 2<sup>nd</sup> EOSC High-level Expert Group

Cc: Mr. Jean-Eric Paquet, Director-General of DG RTD  
Mr. Jean-Claude Burgelman, Head of Unit Open Data Policies and Science Cloud, DG RTD

Brussels, 2 August 2018

Dear Ms Muscella, dear Chair of the 2<sup>nd</sup> EOSC High-level Expert Group,

I am writing to you on behalf of Science Europe, the association of major public research funding and performing organisations, to comment on the High Level Expert Group's Interim Recommendations.

Science Europe believes in the development of Open Science in a way that recognises the driving role of scientific communities in shaping and adopting Open Science practices. Science Europe therefore strongly supports the ambitions for the EOSC: to foster the FAIR principles for research data; to ensure the recognition of researchers' data skills; to allow easier replicability of results; to limit data wastage; and, to contribute to clarification of the funding model for data generation and preservation.

Science Europe has consulted experts in its Member Organisations on the Interim Recommendations and contributed to the consultation conducted by your Expert Group. Given the heterogeneity of some feedback received, I would like to take this opportunity to comment on some specific aspects, as it was not possible to respond to some of the recommendations in the survey.

### Implementation recommendations

- 1) *The EOSC should implement "whatever works" and do "whatever it takes" to increase the availability and volume of quality & user-friendly scientific information online.*

Science Europe strongly supports developments that contribute to the successful implementation of the EOSC and is engaged in various initiatives that will contribute to the setting it up. However, we find this first recommendation vague and there are concerns that the phrase "whatever it takes" might trigger costs at a later stage that have not been taken into consideration so far. At this stage of development towards the EOSC we would prefer more concrete recommendations.

- 4) *Introduce, as part of EOSC's mission, that a state of the art analysis is carried out on a national level within the Member States for assessing statistics and key assets around the composition and relevant clustering of the community of users, with the respective infrastructures & research infrastructures & scientific communities.*

A large project like the EOSC that brings together so many different actors and aspects obviously needs a process of well-informed decision-making, in order to take the multitude of different needs into account. However, there is already a lot of evidence and information available and we thus strongly suggest using existing data as much as possible.

- 6) *Adopt EOSC standards – from international standards – for information encoding and for protocols for data sharing and publication to implement FAIR principles over data and services in a complete & efficient way. And vice versa, offer open EOSC standards to international standardisation bodies.*

Our experts were not sure how to interpret this recommendation which could indicate that it needs further clarification for the research community.

If this recommendation refers to technical standards, Science Europe fully agrees as those will be necessary to make the EOSC interoperable. Scientific standards, however, should be set and promoted by the scientific communities.

- 10) *Simplify early (beta) participation in the EOSC by potential data providers, service providers, and underlying infrastructure providers, by relaxing initial constraints but without relaxing quality standards for data and services.*

We recognise that the EOSC is a large project with many aspects to test. However, we recommend that tests should be conducted in a testing environment, not in a live EOSC. All stakeholders participating in EOSC should have the same conditions and environment at any given time.

- 11) *Resource allocation, particularly for early stage pilots, needs to be dynamic and amenable to change even at short notice.*

As per the previous recommendation, we think that all stakeholders participating in the EOSC should have the same conditions and environment at any given time.

## Engagement recommendations

- 1) *Create career-enhancing incentives for researchers who open the science that they produce as also indicated by the OSPP, e.g. who lodge high quality, curated data in trusted repositories, share data services to their peers, or develop open software and services, and make the EOSC a portal to those incentives.*

Science Europe fully supports the idea of creating incentives for researchers to make their results open. However, Open Science in general should be promoted, incentives should not be solely linked to the condition of using the EOSC.

- 5) *To stimulate the “demand side” of the EOSC, ensure establishment of dedicated funding for demonstrations of the EOSC at EU level that would include researchers and their infrastructure providers (e.g., ESOC in practice stories, cross-disciplinary success of EOSC).*

Science Europe does agree in principle that the benefits of the EOSC should be communicated to the research community. However, demonstrator projects are usually expensive and used rather for publicity reasons. If the EOSC services prove to be useful, researchers will use them on their own initiative.

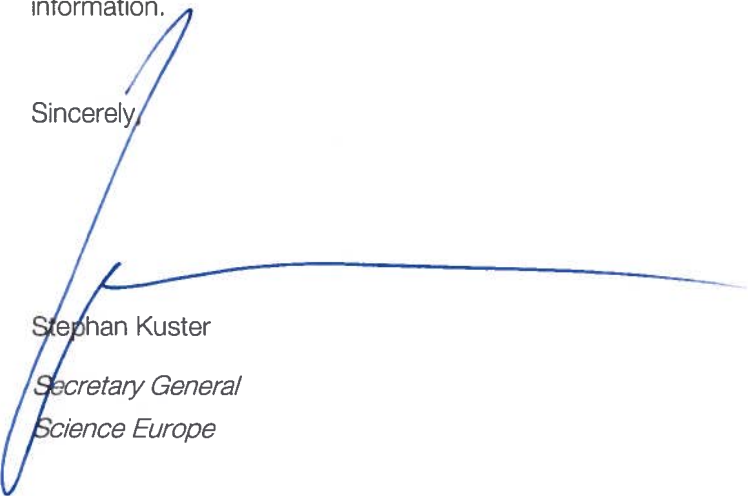
## Steering recommendations

- 2) *Harness inputs and pledges of the coalition of doers and support their activities in the context of EOSC implementation.*

There are many initiatives supporting the development of the EOSC. Not all of them are considered as part of the so-called 'coalition of doers', but their contributions are still valuable. We strongly recommend not to take symbolic actions like the signing of the EOSC Declaration as the major criterion to establish which inputs are worth being harnessed, but to concentrate instead on the actual usefulness of the contributions.

I hope that these comments are a helpful contribution to your Expert Group's work on finalising the recommendations. Of course we are happy to discuss in further detail if you would like additional information.

Sincerely,



Stephan Kuster  
*Secretary General*  
*Science Europe*