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Comments of the EOSC-Nordic project on the Strawman report released by the EOSC WG on Sustainability

The EOSC-Nordic project has studied the recently released *strawman report* from the EOSC Sustainability Working Group and would like to make the following comments.

EOSC-Nordic is pleased about the progress in defining the activities needed for the sustainability of the EOSC and considers this report as a first step towards the definition of possible models for sustaining EOSC. However, when drafting the next version of the document the authors should take into account that all stakeholders, for whom the future of EOSC and its sustainability is important, may not be familiar with the current discussions, terms and definitions of the EOSC if they are not directly involved in its development. The document should therefore be written in a more easily approachable way and rendered more concrete for instance by providing examples.

The report elaborates value proposition to each primary stakeholder group: end-users (research communities, long tail of science, business organizations), service providers and research funders. It also states that *"The sustainability of EOSC depends not only to...create added-value for the stakeholders but also on the incentive and rewards for researchers that encourage them to participate in a culture of sharing the results of their research."* This point should have more focus on the document and more time dedicated on how to engage researchers to use EOSC.

Researchers are interested in whether EOSC will be able to provide 1) access to data of their interest, 2) applications of their interest, 3) more visibility for their data, and 4) easy sharing of data with researcher colleagues. Reading documentation takes time, rather aim at providing users with examples, templates, blueprints, which is more instructive.

Higher Education Institutions and public research organizations should be placed as the key stakeholder of the EOSC and focus should be in serving well researchers before defining needs and added value of EOSC to user groups from the public sector and industry as was suggested in the document. The timeline set in the EOSC implementation roadmap of the European Commission is too tight to realize and produce services and solutions serving all the end-user groups as planned in the strawman report. When it is time to discover ways to expand the use of EOSC to public sector and industry, identifying sources of funding for this usage should be in focus, especially for the case of public sector, where it is likely that national funding will be needed.

EOSC-Nordic sees that considering global aspects in the realization of the EOSC is very important since research is global and does not have any regional or continental boundaries. The document does describe the global aspect of the EOSC: *"The EOSC will be European and open to the world, reaching out over time to relevant global research partners. It will increase the global value of open research data and support stakeholder engagement, including researchers and citizens. It will gradually widen the initiative to federated network of infrastructures and nodes from global research partners."* EOSC-Nordic will be eager to learn how the global free movement of researchers and their data will be supported and enabled by the EOSC.

EOSC-Nordic is committed to a common culture of data stewardship and FAIR principles and to develop user driven data infrastructure commons. Having this in mind EOSC-Nordic sees that the strawman report focuses too much on reaching industry and public sector users and omits that the core of the success of EOSC is having FAIR research data available and researchers using the EOSC.

The document states that EOSC needs to attract data providers and refers to the European Investment Bank report that sees the wealth of data is a Unique Selling Proposition for EOSC. However, EOSC will not attract many repositories unless it offers something in return. Some repositories may not be sure how to ensure their repository is FAIR. EOSC could help enabling such repositories to become FAIR in return for registering as an EOSC service. EOSC needs to make sure it is easy for a repository or service to join.

EOSC-Nordic pilots innovative solutions, designed to support cross border research collaboration of the research communities and providing access to a wide range of publicly funded services supplied at national, regional, and institutional level. In the strawman document, however, the viewpoint is rather commercial and not enough consideration has been paid to public service operators and how services cross borders could be realized.

EOSC-Nordic is in favor of the model of several digital marketplaces, which can accommodate both public and private service providers, and furthermore *non-for profit* and *for profit* offerings. However, to understand it better more details of the model should be provided. For instance, if there will be more than one marketplace, how these would be divided? By discipline, by type of services, by type of provider? More reflection and elaboration of the currently proposed model is needed also to ensure that commercial service providers and publicly funded research infrastructures, eInfrastructures and services would be able to operate and sustain in the same EOSC environment and digital marketplaces. The document ignores the peculiarities of many public service providers: Limitations to operate and serve outside the mandate (region, scientific discipline etc.) set by their owners and to compete in the same market than commercial service providers due to the EU legislation on competition and procurement.

EOSC-Nordic would like to see in the next version of the document the compensation model of the EOSC digital marketplaces developed and explained. The majority of public service providers are mandated to serve the needs of a specific scientific discipline or region and have few incentives by their funders/owners to provide services and resources beyond that community. The resources are dedicated to serve this mandate and opening them to a wider community would need to be agreed with the relevant owners/ funders.

How would the services and infrastructures that are established, well-functioning and serving their communities be funded and sustained if the current system will be replaced by open digital marketplaces will include *"data and services that are accessible against some form of payments from both publically funded and commercial service providers"* where researchers will be free to choose services that seem most attractive to them (but maybe not the most appropriate) as the document describes? Furthermore, open science cloud and open research data does not mean that services would be accessible or data would be accessible and re-usable for free without a cost. How will pricing, access models and licensing be accomplished in the EOSC for different user groups (publicly funded researchers, private researchers, public sector and industry)? EOSC-Nordic recommends that the next version of the document elaborates more the rights of data owners in the digital markets, in particular for the cases of publicly owned or funded data.

One further aspect to resolve is that when there will be a lot of competing services available in the EOSC, how researchers will be able to choose between them. A rating system could be counter-productive. One solution could be based on load. Although this might become complicated when commercial services will be included, since they rate-limit their service (i.e. the amount of downloads per pay allowed depends on the service fee paid). Would this kind of usage and compensation policy be allowed in EOSC?

The document should focus in a substantial manner on unresolved issues related to legal vehicle, VAT and related issues. Defining implications of legislation and policies to the EOSC and how to

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resolve them is required in order to EOSC-Nordic being able to achieve its objective in supporting the coordination, harmonization and alignment of Nordic and Baltic national policies and practices related to the provision of horizontal research data services with EOSC. On the other hand, when the report discusses public sector data and describes the solutions available in this area, it would be important to have European Interoperability Framework discussed and taken into account in the suggested solution, too.

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