REPUBLIC OF SLOVENIA
MINISTRY OF EDUCATION, SCIENCE AND SPORT

Slovenska nacionalna komisija za UNESCO
Slovenian National Commission for UNESCO

Organizacija Združenih narodov za izobraževanje, znanost in kulturo
United Nations Educational, Scientific and Cultural Organization

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Ref.: CL4333 – Preliminary Report on the first draft of the Recommendation on Open Science

TO WHOM IT MAY CONCERN

Dear Colleagues,

We would like to sincerely thank you for the proposed Recommendation draft which is our view very well structured, conceptualized and written. Here are some of our potential suggestions that we have gathered interdisciplinary and on a multi-stakeholder basis:

- One of the important aspects when dealing with Open Science and science in general is responsible research and innovation (RRI). The document tackle RRI in some places like (11, 16.c, 21.b, 22.h), but it should be expressed more concretely. RRI is an approach that involve all societal actors in working together during the whole research and innovation process in order to better align both the process and its outcomes with the values, needs and expectations of society. RRI focuses on the participation of citizens and civil society organisations in research and innovation, the gender and ethical dimensions, the free accessibility to scientific knowledge and formal and informal science education, but also on institutional changes in research performing and research organisations, that are necessary to further its goals. EU has been quite active in integrating RRI in EU research principles with the Rome Declaration of November 2014[1] and in the minutes of the Competitiveness Council of 5 December 2014[2].
- The next important aspect is the relationship between science and society, its importance, the degree of urgency to act, and the kind of activities that should be launched in response to these assessments, depending on the normative approach adopted imply that learning-in-interaction must be important for the Open Science.
- Assessment of scientific contribution and career progression rewarding good Open Science practices is a prerequisite for the transition to Open Science. This extremely important statement is already in the text under (v) 22. Nevertheless, due to its extreme importance for the success of the whole Open Science, we see it necessary to make it more visible and to put adequate text, describing this, also under (II) 19, after the point (a), as follows:

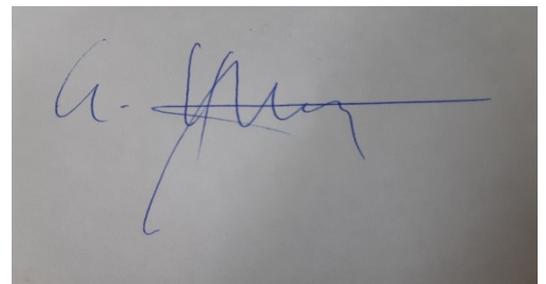[1] https://ec.europa.eu/research/swafs/pdf/rome_declaration_RRI_final_21_November.pdf

[2] http://www.consilium.europa.eu/uedocs/cms_Data/docs/pressdata/en/intm/146048.pdf; See also the Presidency paper prepared for the debate at Council level:
http://register.consilium.europa.eu/doc/srv?l=EN&f=ST%2015451%202014%20INIT

"(b) Ensuring that authorities, dealing with publicly funded research, are actively engaged in aligning research assessment so, that it takes into account Open Science practices;"

The points that are following shall be re-labeled accordingly.

In addition, here we provide some concrete suggestions related to specific topics in the Draft Recommendation:

- 9.IV   Open Science Infrastructures should also involve Open Laboratories, Open Testbeds, Open Living Labs, Accessible Research Facilities, etc.
  We encourage UNESCO to consider access to publicly funded scientific instrumentation as a part of Open Science and embed adequate recommendation on that as well (to recommend access to publicly funded scientific instrumentation (especially to the more costly one) as open as possible and only as closed as necessary);

- 18. add g) Include open science principles in educational practices in formal and informal education – it might already be included in 21 a) but it might not be clear for Member States;

- 19 e) Promoting multilingualism is not about policies – should be either reframed or better put under 18;

- 19 i) This sentence is confusing "The importance of commercial providers of services and data renders the call for open availability of information and data as well as transparency about their quality and provenance even more urgent";

- 20 a) This might also be confusing. The "National science technology and innovation Systems" is too general term and could mean the investment beyond infrastructure and services;

- 20 - Open Science infrastructures and services should go beyond just data and IT infrastructure – reffering to the comment above (9.IV) about open laboratories;

- 20 e) or h) or… – Somewhere there should be a recommendation to adopt proper digital preservation of data, tools, methods used for experiments so that they can be rerun anytime in the future – i.e. Digital Preservation for Timeless Research Processes and Services;

- 18 and 23 are somehow similar – consider merging the two.

Ljubljana, 31.12.2020

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