Guidelines on Open Access to Scientific Publications and Research Data in Horizon 2020

Version 1.0
11 December 2013

Research and Innovation

Guidelines on Open Access to Scientific Publications and Research Data in Horizon 2020

Version 16 December 2013

These Guidelines provide context and explanation for the rules on open access applicable to beneficiaries in projects funded or co-funded under Horizon 2020.

1. What is open access (OA)?

Open access can be defined as the practice of providing on-line access to scientific[1] information that is free of charge to the end-user and that is re-usable. In the context of research and innovation, 'scientific information' can refer to (i) peer-reviewed scientific research articles (published in scholarly journals) or (ii) research data (data underlying publications, curated data and/or raw data).

(i) Open access to scientific publications refers to free of charge online access for any user. Legally binding definitions of 'open access' and 'access' in this context do not exist, but authoritative definitions of open access can be found in key political declarations on this subject[2]. These definitions describe 'access' in the context of open access as including not only basic elements such as the right to read, download and print, but also the right to copy, distribute, search, link, crawl, and mine.

There are two main routes towards open access to publications:

A. **Self-archiving** (also referred to as 'green' open access) means that the published article or the final peer-reviewed manuscript is archived (deposited) by the author - or a representative - in an online repository before, alongside or after its publication. Repository software usually allows authors to delay access to the article ('embargo period').[3]

[1] The term 'scientific' refers to all scholarly disciplines.

[2] Open access in the Budapest Declaration (2002): "By open access to this literature, we mean its free availability on the public internet, permitting any users to read, download, copy, distribute, print, search, or link to the full texts of these articles, crawl them for indexing, pass them as data to software, or use them for any other lawful purpose, without financial, legal, or technical barriers other than those inseparable from gaining access to the internet itself. The only constraint on reproduction and distribution, and the only role for copyright in this domain, should be to give authors control over the integrity of their work and the right to be properly acknowledged and cited" (see http://www.budapestopenaccessinitiative.org/read).
Open access in the Berlin Declaration (2003): "Open access contributions must satisfy two conditions: 1. The author(s) and right holder(s) of such contributions grant(s) to all users a free, irrevocable, worldwide, right of access to, and a license to copy, use, distribute, transmit and display the work publicly and to make and distribute derivative works, in any digital medium for any responsible purpose, subject to proper attribution of authorship (community standards, will continue to provide the mechanism for enforcement of proper attribution and responsible use of the published work, as they do now), as well as the right to make small numbers of printed copies for their personal use. 2. A complete version of the work and all supplemental materials, including a copy of the permission as stated above, in an appropriate standard electronic format is deposited (and thus published) in at least one online repository using suitable technical standards (such as the Open Archive definitions) that is supported and maintained by an academic institution, scholarly society, government agency, or other well-established organization that seeks to enable open access, unrestricted distribution, inter operability, and long-term archiving" (see http://openaccess.mpg.de/67605/berlin_declaration_engl.pdf).

[3] Some publishers request embargo periods, arguing that these protect the value of the journal subscriptions they sell.

B. **Open access publishing** (also referred to as 'gold' open access) means that an article is immediately provided in open access mode as published. In this model, the payment of publication costs is shifted away from readers paying via subscriptions. The business model most often encountered is based on one-off payments by authors. These costs (often referred to as Author Processing Charges, APCs) can usually be borne by the university or research institute to which the researcher is affiliated, or to the funding agency supporting the research. In other cases, the costs of open access publishing are covered by subsidies or other funding models.

Misconceptions about open access to scientific publications. In the context of research funding, open access requirements in no way imply an obligation to publish results. The decision on whether or not to publish lies entirely with the fundees. Open access becomes an issue only *if* publication is elected as a means of dissemination.

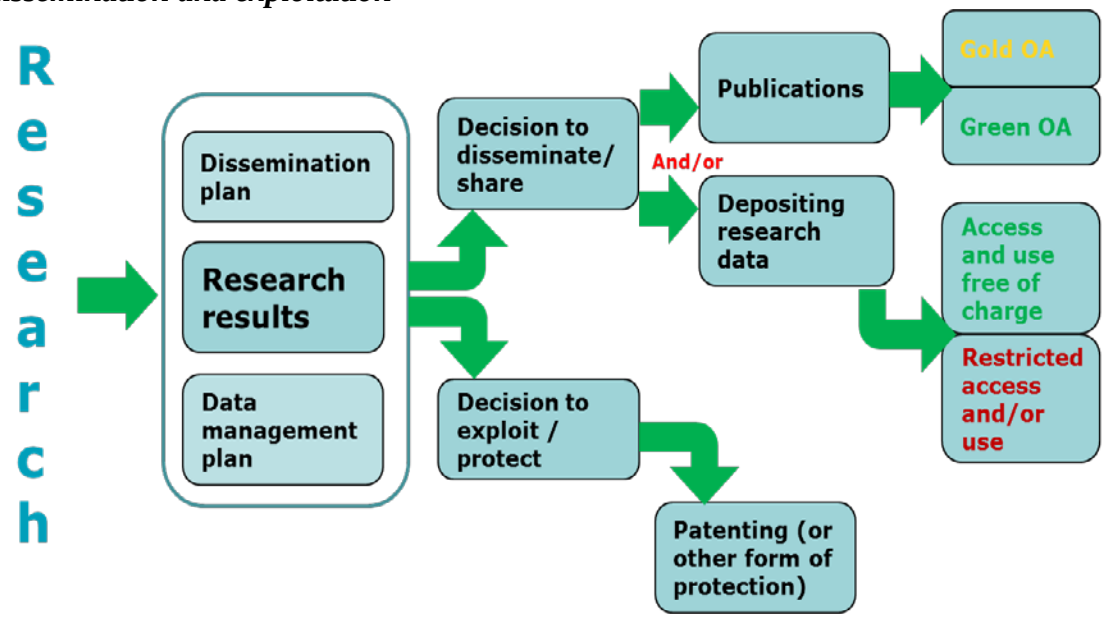
Moreover, OA does not interfere with the decision to exploit research results commercially, e.g. through patenting. Indeed, the decision on whether to publish open access must come after the more general decision on whether to publish directly or to first seek protection.[4] This is illustrated in the graphic representation of open access to scientific publication and research data in the wider context of dissemination and exploitation at the end of this section.

(ii) Open access to research data refers to the right to access and re-use digital research data[5] under the terms and conditions set out in the Grant Agreement. Openly accessible research data can typically be accessed, mined, exploited, reproduced and disseminated free of charge for the user.

[4] More information on this issue is available in the European IPR Helpdesk fact sheet "Publishing vs. patenting"

[5] 'Research data' refers to information, in particular facts or numbers, collected to be examined and considered and as a basis for reasoning, discussion, or calculation. In a research context, examples of data include statistics, results of experiments, measurements, observations resulting from fieldwork, survey results, interview recordings and images. The focus is on research data that is available in digital form.

Graph: Open access to scientific publication and research data in the wider context of dissemination and exploitation



2. Why open access to publications and data in Horizon 2020?

Modern research builds on extensive scientific dialogue and advances by improving earlier work. Moreover, the Europe 2020 strategy for a smart, sustainable and inclusive economy underlines the central role of knowledge and innovation in generating growth. Fuller and wider access to scientific publications and data therefore help to:

- build on previous research results (improved quality of results);
- foster collaboration and avoid duplication of effort (greater efficiency);
- accelerate innovation (faster to market = faster growth);
- involve citizens and society (improved transparency of the scientific process).

For these reasons, the European Union (EU) strives to improve access to scientific information and to boost the benefits of public investment in the research funded under the EU Framework Programme for Research and Innovation Horizon 2020 (2014-2020).

The European Commission's vision is that information already paid for by the public purse should not be paid for again each time it is accessed or used, and that it should benefit European companies and citizens to the full. This means making publicly-funded scientific information available online, at no extra cost, to European researchers, innovative industries and citizens, while ensuring long-term preservation.

3. Political and legal basis for rules on open access in Horizon 2020

European-level open access policy springs from several mutually-reinforcing policy strands:

(i) The Digital Agenda for Europe[6], sets out an 'open data' policy covering the full range of information that public bodies across the European Union produce, collect or pay for[7].

(ii) The Innovation Union policy[8], which outlines the EU's research and innovation policies and programmes.

(iii) The Communication 'A Reinforced European Research Area Partnership for Excellence and Growth'[9] The ERA is a unified research area open to the world based on the Internal Market, in which researchers, scientific knowledge and technology circulate freely. One of the key actions foreseen to achieve this goal is to optimise the circulation, access to and transfer of scientific knowledge.

The principles of the Digital Agenda, the Innovation Union and the European Research Area were spelled out in more detail in the Scientific Information of 17 July 2012, consisting of the Commission Communication 'Towards better access to scientific information: Boosting the benefits of public investments in research'[10] and the 'Commission Recommendation on access to and preservation of scientific information'[11] [12]. The Communication set out the Commission's approach to open access in Horizon 2020. The Recommendation advised EU Member States to build their own Open Access policies on the basis of the same principles.

Open access as a principle in Horizon 2020 now has its legal basis in the Framework Programme itself[13] and in its Rules for Participation[14]. The Rules for Participation state the following:

> *With regard to the dissemination of results through scientific publications, open access shall apply under the terms and conditions laid down in the grant agreement. Costs relating to open access to scientific publications that result from research funded under Horizon 2020, incurred within the duration of an action, shall be eligible for reimbursement under the conditions of the grant agreement. […] the grant agreement shall not stipulate conditions regarding open access to publications which would result in additional publishing costs after the completion of an action.*
> *With regard to the dissemination of research data, the grant agreement may, in the context of the open access to and the preservation of research data, lay down terms and conditions under which open access to such results shall be provided, in particular in ERC frontier research and FET (Future and Emerging Technologies) research or in other appropriate areas, and taking into consideration the legitimate*

[6] COM(2010) 245 final/2.
[7] See the 'Open Data' package adopted on 12 December 2011, COM(2011) 882.
[8] COM(2010) 546 final.
[9] COM(2012) 392 final.
[10] COM(2012) 401.
[11] C(2012) 4890.
[12] Open access policy in Horizon 2020 also builds on the 2007 Communication on scientific information in the digital age (COM(2008)56) and the related Council Conclusions, the 2009 Communication on ICT infrastructures for e-Science (COM(2009)108).
[13] Recital 28 and Article 18 of Regulation (EU) No .../2013 of the European Parliament and of the Council establishing Horizon 2020 - the Framework Programme for Research and Innovation (2014 2020) and repealing Decision No 1982/2006/EC.
[14] Article 43.2 of Regulation (EU) No .../2013 of the European Parliament and of the Council laying down the rules for participation and dissemination in "Horizon 2020 - the Framework Programme for Research and Innovation (2014-2020)" and repealing Regulation (EC) No 1906/2006.

interests of the participants and any constraints pertaining to data protection rules, security rules or intellectual property rights. In such cases, the work programme or work plan shall indicate if the dissemination of research data through open access is required.

These principles are translated into specific requirements in the Model Grant Agreement[15] under the Horizon 2020 Work Programme.[16] The Annotated Model Grant Agreement provides explanation on the Model Grant Agreement specifically. The present Guidelines build on these documents (see annexes).

4. Mandate on open access to publications

The detailed legal requirements on open access to publications are contained in article 29.2 of the Model Grant Agreement.

Under Horizon 2020, each beneficiary must ensure open access to all peer-reviewed scientific publications relating to its results.

In order to comply with this requirement, beneficiaries must, at the very least, ensure that their publications, if any, can be read online, downloaded and printed. However, as any additional rights such as the right to copy, distribute, search, link, crawl, and mine increase the utility of the accessible publication, beneficiaries should make every effort to provide for as many of them as possible.

'Peer-reviewed' publications refer to publications that have been evaluated by peers, i.e. other scholars. Peer review is typically, yet not exclusively, organised by the journal or publisher to which an article or manuscript is submitted. New approaches to the organisation of peer review are expected to become more prevalent in the coming years.

The dominant type of peer-reviewed scientific publication is the journal article. In addition, however, beneficiaries are strongly encouraged to provide open access to other types of scientific publications, some of which may, in some cases, not be peer-reviewed, including monographs, books, conference proceedings and grey literature (informally published written material not controlled by scientific publishers, e.g. reports).

The open access mandate is composed of two steps: 1. depositing publications into repositories, and 2. providing open access to them. These two steps may or may not occur at the same time, depending on whether open access publishing ('gold' open access) or self-archiving ('green' open access) is used, and, in the case of self-archiving, depending on the embargo period (if any).

Step 1: beneficiaries must deposit a machine-readable electronic copy of the published version or final peer-reviewed manuscript accepted for publication in a repository for scientific publications. This must be done as soon as possible and at the latest upon

[15] Multi-beneficiary General Model Grant Agreement, Version 1.0 11 December 2013.

[16] Commission implementing decision of 10 December 2012 adopting the 2014-2015 work programme in the framework of the Specific Programme Implementing Horizon 2020 – The Framework Programme for Research and Innovation (2014-2020)

publication. This step must be followed even where open access publishing ('gold' open access) is chosen in order to ensure long-term preservation of the article.

The term 'machine-readable electronic copy' means that the publications must be in a format that can be used and understood by a computer. They must be stored using text file formats which are either standardised or otherwise publicly known so that anyone can develop new tools for working with these documents.

In some cases, the deposit of the final version of an article is possible before publication, for example upon acceptance of the publication by the journal. The latest acceptable time to deposit a publication is the date of publication. Where possible, the published version (in terms of layout, pagination, etc.) should be deposited.

A repository for scientific publications is an online archive. Institutional, subject-based and centralised repositories are all acceptable choices. Beneficiaries should not choose a repository which claims rights over deposited publications and precludes access. The Open Access Infrastructure for Research in Europe (OpenAIRE) is the recommended entry point for researchers to determine what repository to choose (http://www.openaire.eu). OpenAIRE also offers support services for researchers, such as the National Open Access Desks. Other useful listings of repositories are the Registry of Open Access Repositories (ROAR, http://roar.eprints.org/) and the Directory of Open Access Repositories (OpenDOAR, http://www.opendoar.org/).

Moreover, the beneficiary must aim to deposit at the same time the research data needed to validate the results presented in the deposited scientific publications, ideally into a data repository.

This requirement is based on the fact that the concept of 'publication' has rapidly evolved over the past years and in the context of the digital era. Therefore, the notion of 'publication' increasingly includes the data underpinning the publication and results presented, also referred to as 'underlying' data. This data is needed to validate the results presented in the deposited scientific publication and is therefore seen as a crucial part of the publication and an important ingredient enabling scientific best practice. Beneficiaries are also invited to grant open access to this data, but there is no obligation to do so.

Step 2: after depositing publications and, where possible, underlying data, beneficiaries must ensure open access to the deposited publication via the chosen repository.

Beneficiaries can choose one of two main ways to comply with this requirement:

1) Self-archiving / 'green' OA: beneficiaries can deposit the final peer-reviewed manuscript in a repository of their choice (see explanation of ‘repository’ above). In this case, they must ensure open access to the publication within a maximum of six months (twelve months for publications in the social sciences and humanities).

2) Open access publishing / 'gold' OA: researchers can also publish in open access journals, or in journals that sell subscriptions and also offer the possibility of making individual articles openly accessible (hybrid journals). Monographs can also be published either via a 'pure' open access or via a hybrid business model. The author processing charges (APCs) for gold open

access incurred by beneficiaries are eligible for reimbursement during the duration of the project (see article 6.2.D.3 of the Model Grant Agreement). In all cases, open access via the chosen repository must be ensured upon publication.

The costs of 'gold' open access publications incurred after the end of projects are not eligible for reimbursement via the budget of the specific action. However, at the beginning of Horizon 2020, a mechanism will be piloted for also dealing with open access publication charges incurred after the end of grant agreements with the Commission. This pilot is supported via 2014-15 European Research Infrastructures Work Programme (e-Infrastructures part, topic EINFRA-2-2014 – e-Infrastructure for Open Access). Details of this pilot will become available in 2014-15.

Beneficiaries must also ensure open access — via the repository — to the bibliographic metadata that identify the deposited publication. The bibliographic metadata must be in a standard format and must include the following:

- the terms *["European Union (EU)" and "Horizon 2020"]["Euratom" and Euratom research and training programme 2014-2018"]*;
- the name of the action, acronym and grant number;
- the publication date, and length of embargo period if applicable, and a persistent identifier.

The purpose of the requirement on metadata is to maximise the discoverability of publications and to ensure the acknowledgment of EU funding. Bibliographic data mining is more efficient than mining of full text versions. The inclusion of information relating to EU funding as part of the bibliographic metadata is necessary for adequate monitoring, production of statistics, and assessment of the impact of Horizon 2020. For adequate identification of the action concerned, the grant number, name and/or acronym of the action is needed (preferably all three). The publication date and embargo period enable the monitoring of the embargo periods. The persistent identifier (for example a Digital Object Identifier, DOI) identifies the publication. It allows linking to an authoritative version of the publication. For example, OpenAIRE (http://www.openaire.eu) will provide means to check the metadata compliance of the chosen repository.

In all cases, the Commission encourages authors to retain their copyright and grant adequate licences to publishers. Creative Commons offers useful licensing solutions in this regard (e.g. CC-BY or CC-0 licences, see http://creativecommons.org/licenses/). This type of licence is a good legal tool to enable open access in its broadest sense.

Where possible, it is also recommended that contributors be uniquely identifiable, and data uniquely attributable, through identifiers which are persistent, non-proprietary, open and interoperable (e.g. through leveraging existing sustainable initiatives such as ORCID for contributor identifiers and DataCite for data identifiers).

5. Open Research Data Pilot

A novelty in Horizon 2020 is the Open Research Data Pilot which aims to improve and maximise access to and re-use of research data generated by projects. The legal requirements for projects participating in this pilot are contained in the optional article 29.3 of the Model

Grant Agreement. Other relevant information, such as the scope of the Pilot, is provided in the introduction to the Horizon 2020 Work Programme. The Pilot on Open Research Data will be monitored throughout Horizon 2020 with a view to further developing EC policy on open research.

Scope of the Pilot. For the 2014-2015 Work Programme, the areas of Horizon 2020 that participate in the Open Research Data Pilot are:

- Future and Emerging Technologies
- Research infrastructures – part e-Infrastructures
- Leadership in enabling and industrial technologies – Information and Communication Technologies
- Societal Challenge: 'Secure, Clean and Efficient Energy' – part Smart cities and communities
- Societal Challenge: 'Climate Action, Environment, Resource Efficiency and Raw materials' – except raw materials
- Societal Challenge: 'Europe in a changing world – inclusive, innovative and reflective Societies'
- Science with and for Society

This corresponds to about €3 billion or 20% of the overall Horizon 2020 budget in 2014 and 2015.

Total or partial opting out of the Pilot Action on Open Research Data.
Projects may at any stage opt out of the Pilot for a variety of reasons, namely:

- if participation in the Pilot on Open Research Data is incompatible with the Horizon 2020 obligation to protect results if they can reasonably be expected to be commercially or industrially exploited;

- if participation in the Pilot on Open Research Data is incompatible with the need for confidentiality in connection with security issues;

- if participation in the Pilot on Open Research Data is incompatible with existing rules concerning the protection of personal data;

- if participation in the Pilot on Open Research Data would jeopardise the achievement of the main aim of the action;

- if the project will not generate / collect any research data;

- if there are other legitimate reason to not take part in the Pilot (at proposal stage – free text box provided).

At the proposal submission stage, the information provided is **not** part of the evaluation. Proposals will not be evaluated more favourably because they are part of the Pilot and will not be penalised for opting out of the Pilot.

During the lifetime of a project an opt out remains possible for any of the reasons above and needs to be described in the projects' Data Management Plan (DMP).[17]

Voluntary participation in the Pilot on Open Research Data. Areas or subareas of, or individual projects funded under Horizon 2020 and not covered by the scope of the Pilot outlined above may participate in the pilot on a voluntary basis. The project consortia that decide to participate in the Pilot on a voluntary basis will include article 29.3 in their grant agreement and will be monitored along with and receive the same support as all other projects participating in the Pilot.

The Open Research Data Pilot applies to two **types of data**:

1) the data, including associated metadata[18], needed to validate the results presented in scientific publications as soon as possible;

2) other data[19], including associated metadata, as specified and within the deadlines laid down in the data management plan.

Data management and data management plans (DMP): A data management plan is a document outlining how the research data collected or generated will be handled during a research project, and after it is completed, describing what data will be collected / generated and following what methodology and standards, whether and how this data will be shared and/or made open, and how it will be curated and preserved (see separate Guidelines on Data Management in Horizon 2020 on the Participant Portal).

Where relevant, Horizon 2020 project proposals must include a section on data management which is evaluated under the criterion 'Impact'.

The use of a detailed data management plan covering individual datasets is required for funded projects participating in the Open Research Data Pilot. A first version of the data management plan must be provided as an early deliverable within six months of the project.

Other funded projects that do not participate in the Pilot are also invited to submit a Data Management Plan if relevant for their planned research, but this is not compulsory.

Further information on data management, DMPs and a DMP template can be found in the Guide on Data Management which is available on the Participant Portal.

What are the requirements of the Open Research Data Pilot? The Grant Agreements of projects participating in the Pilot include Article 29.3. Projects participating in the Pilot must comply with the following:

[17] See separate guidance document on Data Management in Horizon 2020.
[18] Associated metadata refers to the metadata describing the research data deposited.
[19] For instance curated data not directly attributable to a publication, or raw data

1) **Step 1:** participating projects are required to deposit the research data described above, preferably into a research data repository. 'Research data repositories' are online archives for research data. They can be subject-based/thematic, institutional or centralised. Useful listings of research data repositories include the Registry of Research Data Repositories (www.re3data.org) and Databib (http://databib.org). In addition, it is expected that the Open Access Infrastructure for Research in Europe (OpenAIRE) will become an entry point for linking publications to underlying research data.

2) **Step 2:** as far as possible, projects must then take measures to enable for third parties to access, mine, exploit, reproduce and disseminate (free of charge for any user) this research data. One straightforward and effective way of doing this is to attach Creative Commons Licence (CC-BY or CC0 tool) to the data deposited (http://creativecommons.org/licenses/, http://creativecommons.org/about/cc0).

At the same time, projects should provide **information** via the chosen repository about tools and instruments at the disposal of the beneficiaries and necessary for validating the results, for instance specialised software or software code, algorithms, analysis protocols, etc. Where possible, they should provide the tools and instruments themselves.

Incentives / supporting measures: Costs relating to the implementation of the pilot will be eligible. Specific technical and professional support services will also be provided (e-Infrastructures WP).

6. Further information and help

Horizon 2020: http://ec.europa.eu/programmes/horizon2020/

Participant Portal: http://ec.europa.eu/research/participants/portal/

Open access (Science in Society site): http://ec.europa.eu/research/science-society/open_access

Open access (Digital Agenda site): http://ec.europa.eu/digital-agenda/en/open-access-scientific-knowledge-0

OpenAIRE: http://www.openaire.eu/

7. Annexes

A. Excerpt from Horizon 2020 Work Programme 2014 – 2015 (Part 'Table of Contents and General Introduction)

1.5 Communication, open access to research results and a new emphasis on data management

Horizon 2020 takes a new approach to communication and to the access provided to research results and to data management.

First, actions shall develop and implement a comprehensive communication plan to ensure a high visibility of the funded actions and help to maximise the impact of results.

Second, following Horizon 2020's open access policy, beneficiaries must ensure that peer-reviewed scientific publications resulting from Horizon 2020 funding are deposited in repositories and made open access i.e. free of charge online access for the user.

Beneficiaries must also aim to deposit at the same time the research data needed to validate the results presented in scientific publications. Further information on the Open Access in Horizon 2020 is made available on the Participant Portal.

A novelty in Horizon 2020 is the Open Research Data Pilot which aims to improve and maximise access to and re-use of research data generated by projects. Participating projects will make their research data available on a voluntary basis, as specified in their Data Management Plans (DMPs, see below). They will also be required to make available the data needed to validate the results presented in scientific publications. Participating projects will receive dedicated support. In particular, any costs relating to the implementation of the pilot will be reimbursed and specific technical and professional support services will be provided.

Areas of the 2014-2015 Work Programme participating in the Open Research Data Pilot are:

- Future and Emerging Technologies
- Research infrastructures – part e-Infrastructures
- Leadership in enabling and industrial technologies – Information and Communication Technologies
- Societal Challenge: Secure, Clean and Efficient Energy – part Smart cities and communities
- Societal Challenge: Climate Action, Environment, Resource Efficiency and Raw materials – except raw materials
- Societal Challenge: Europe in a changing world – inclusive, innovative and reflective Societies
- Science with and for Society

Projects have the possibility to opt out of the pilot.

Individual actions funded under other areas of the Work Programme can participate in the Pilot on a voluntary basis.

Further information on the Open Research Data Pilot is made available on the Participant Portal.

A further new element in Horizon 2020 is the use of Data Management Plans (DMPs) detailing what data the project will generate, whether and how it will be exploited or made accessible for verification and re-use, and how it will be curated and preserved. The use of a Data Management Plan is required for projects participating in the Open Research Data Pilot. Other projects are invited to submit a Data Management Plan if relevant for their planned research.

Further information on Data Management Plans is made available on the Participant Portal.

B. Excerpt from Model Grant Agreement

29.2 Open access to scientific publications

Each beneficiary must ensure open access (free of charge online access for any user) to all peer-reviewed scientific publications relating to its results. In particular, it must:

(a) as soon as possible and at the latest on publication, deposit a machine-readable electronic copy of the published version or final peer-reviewed manuscript accepted for publication in a repository for scientific publications;

Moreover, the beneficiary must aim to deposit at the same time the research data needed to validate the results presented in the deposited scientific publications.

(b) ensure open access to the deposited publication — via the repository — at the latest:

(i) on publication, if an electronic version is available for free via the publisher, or

(ii) within six months of publication (twelve months for publications in the social sciences and humanities) in any other case.

(c) ensure open access — via the repository — to the bibliographic metadata that identify the deposited publication.

The bibliographic metadata must be in a standard format and must include all of the following:

- the terms *["European Union (EU)" and "Horizon 2020"]["Euratom" and Euratom research and training programme 2014-2018"]*;

- the name of the action, acronym and grant number;

- the publication date, and length of embargo period if applicable, and

- a persistent identifier.

29.3 Open access to research data

***[OPTION for actions participating in the open Research Data Pilot**: Regarding the digital research data generated in the action ('**data**'), the beneficiaries must:*

(a) deposit in a research data repository and take measures to make it possible for third parties to access, mine, exploit, reproduce and disseminate — free of charge for any user — the following:

(i) the data, including associated metadata, needed to validate the results presented in scientific publications as soon as possible;

(ii) other data, including associated metadata, as specified and within the deadlines laid down in the data management plan (see Annex I);

(b) provide information — via the repository — about tools and instruments at the disposal of the beneficiaries and necessary for validating the results (and — where possible — provide the tools and instruments themselves).

This does not change the obligation to protect results in Article 27, the confidentiality obligations in Article 36, the security obligations in Article 37 or the obligations to protect personal data in Article 39, all of which still apply.

*As an exception, the beneficiaries do not have to ensure open access to specific parts of their research data if the achievement of the action's main objective, as described in Annex I, would be jeopardised by making those specific parts of the research data openly accessible. In this case, the data management plan must contain the reasons for not giving access.**]***

[OPTION:** not applicable**]

C. Excerpt from Annotated Model Grant Agreement (to be provided when finalised)