



Eidgenössische Technische Hochschule Zürich
Swiss Federal Institute of Technology Zurich

Konferenz des Lehrkörpers

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Consultation Response Research Data Management Guideline

Dear Mr Strebel

The Lecturers' Conference thanks you for the opportunity to comment on the research data management guidelines.

We appreciate the guidelines for research data management to reach an ideal RDM with open data, professional RDM and FAIR principles. However, the guideline puts most of the responsibility and the costs associated with it on the researchers but proposes little to support the transformation to open science. For instance, there is a large gap between the ideals of RDM and the infrastructure that ETH Zürich offers (e.g., through ETH Library and ETH IT Services).

Given the importance of the topic and the redundancy of challenges between researchers and departments, we think that ETH as a whole (and thus also supported by central administration) should proactively lead the effort towards professional and efficient solutions. This process should precede a consultation (Vernehmlassung) on this topic. Therefore, we suggest waiting for the completion of this process before an in-depth revision of this consultation.

Specific comments:

(*) Art 4 comma 4a: is group level the right level or should it rather be at the institute's level?

(*) Art 6 comma 1b vs. Art 6 comma 3: the same rules should apply for data and programming code. We suggest adding "programming code" to Art 6 comma 1b. If you prefer to keep them separate, then we suggest using the same words, either "must be deposited" or "recommended" for both as data in some disciplines can only be reproduced with the programming code.

(*) Art 7 comma 1: add programming code here as well.

(*) Art 8 general: shouldn't lecturers be considered as well? Either here or elsewhere? Correct documenting and reporting for reproducible science is important also for lab courses and all written assignments, reports and theses. It should be a stated teaching goal of ETH Dept. to train and sensitize students on these topics.

(*) Art 9 comma 1: “facilitate” should be replaced with “enable”. The wording leaves the impression that central admins are only responsible for providing accessory tools. Instead, central admin should strive to provide complete solutions and infrastructure for open science.

(*) Art 9 comma 2b: Remove the reference to “ETH Research Data Hub and Node”. A guideline should focus on services and not on specific products. The statement reads like an endorsement that the two mentioned products are the unique solution to the challenge. However, the two mentioned tools have a very specific target (groups with largely standardized SOPs) but fails to address common use cases.

(*) Art 9 comma 2d: Other relevant service should explicitly include “ELN systems”, ideally also for the purpose of teaching (Bachelor and Master).

(*) Art 8 comma 3b: should be deleted. Data persistence is already a responsibility of group leaders (Art 8 comma 1a). The process is defined under Art 7. Departments don’t seem to have rights or means to “make sure that archiving periods are observed”.

Best regards



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President Lecturers' Conference