DGT Translation Quality Guidelines

DGT's *Quality Management Framework* calls for our translations to be fit for their intended communicative purpose to satisfy the expressed or implied needs and expectations of our direct customers, our partners in the other EU institutions, the end-users, and any other relevant stakeholders. These guidelines aim to clarify the purpose, risks and specific quality requirements of the various texts we translate, providing specific guidance for translators and revisers/reviewers to achieve this fitness-for-purpose. The guidelines are also useful for managers[1] conducting risk assessments, assigning tasks and gauging the need for quality control.

1. Institutional multilingualism and multilingual drafting and law-making — the role of drafting guidelines

Today, EU legislation covers practically all policy areas and affects most areas of citizens' daily lives. As a consequence, the Commission produces many document types – not only legislation and technical reports, but also policy papers, press releases, brochures, web texts, etc. The Commission also corresponds directly with citizens, companies and Member States, for instance in the framework of inquiries and investigations.

This text production has to comply with the legal requirements of multilingualism,[2] but also with the Commission's political objectives: bridging the gap between the EU and its citizens; involving citizens and stakeholders in the political process at European level; and convincing them of the added value of European cooperation.[3] The current Better Regulation/Refit initiatives show that this objective is on top of the political agenda to 'restore the confidence of citizens and businesses in the Commission's ability to deliver'[4].

The Commission has issued a number of text-type-specific drafting guidelines to help drafters understand what the institution wants to achieve with different text

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[1] In this context, managers should be read as Heads of unit or Workflow managers.

[2] There are explicit provisions such as Article 4 of Regulation No 1 of 1958, but the obligation to provide all language versions stems also from general rights established by the Treaties, e.g. the rule of law or the right of citizens to participate in the democratic process (which pre-supposes that the citizen can understand the law and even policy documents). See also Article 22 of the European Charter of Fundamental Rights.

[3] See, for example, *European Governance — A White Paper* (COM(2001) 428) and the Green Paper on a *European Transparency Initiative* (COM(2006) 194).

[4] *Better regulation for better results – An EU agenda* (COM(2015)1215): 'It is important that every single measure in the EU's rulebook is fit for purpose, modern, effective, proportionate, operational and as simple as possible. Legislation should /…/ be easy to implement, provide certainty and predictability and it should avoid any unnecessary burden.'

types and how drafting techniques can contribute to meeting these legal requirements and political goals.

Since all official language versions have the same formal status, the requirements and objectives apply equally to all of them.[5] In practice, this means that for 23 of the 24 official language versions, the requirements and objectives have to be met via translations and the *de facto* drafters are the translators.

The translation that takes place in this setting is *institutional translation* and *multilingual law-making*. The translators are the institutional voice for their respective languages and they produce equally authentic texts. Consequently, **the existing Commission drafting guidelines are not only relevant for the drafters of the original texts but also for the translators and revisers**. A key quality *desideratum* is to produce texts that read like originals in all languages.

However, this has to be nuanced with 'as far as possible', since 23 of the 24 language versions are translations and depend on a source text. Therefore, we need to determine the extent of this dependence and what 'as far as possible' means in practice. The answer is determined by the purpose of the text and may vary from one language to another, since drafting conventions are not the same for all text types or all languages.

2. The role and principles of effective and efficient quality control

When assigning translation and quality control tasks, managers make a risk assessment and take into account both the possible impact of translation errors and the probability of errors occurring. This probability is largely determined by how well the competence profile of translators and revisers match the text at hand. It is also determined by extrinsic factors such as time pressure and the way the translators or revisers respond to this.

The degree to which a competence profile matches with a text is determined by intrinsic factors such as the technicality of the text (domain competence), but also familiarity with text type conventions for legislation, press releases, web texts (textual competence), the need for background information (research competence), the need for localisation (cultural competence), IT literacy to take full advantage of quality-related tools, etc.[6]

Besides these competences translators and revisers have their individual strengths and weaknesses, for instance speed, resistance to stress, accuracy, etc. Experience of course plays a key role. Together these competences and strengths and weaknesses determine the competence profiles of translators and revisers. Generally, managers will know how well the competence profiles of their staff match with the text to translate and decide on a case-by-case basis which kind of quality control should be applied and by whom.

DGT distinguishes between two types of quality control[7]:

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[5] There are exceptions, e.g. decisions addressed to a particular entity or Member State, where only the notified version is authentic. Correspondence is also special in this respect since it normally is translated only into one language.

[6] Cf. ISO 17100, point 3.1.3

[7] Cf. ISO 17100, points 2.2.6 and 2.2.7.

- 'Revision', which means bilingual examination of target language content against source language content for its suitability for the agreed purpose.
- 'Review', which means monolingual examination of target language content for its suitability for the agreed purpose.

For revision and review to create an added value, it is essential not to miss errors, not to correct what isn't wrong and not to introduce errors while revising. To prevent this from happening, certain basic principles need to be respected:

1. The translation should be properly checked/self-revised/re-read by the translator before it goes to quality control.[8] This implies a separate workflow step for the translator and not just checking during the actual translation phase, while being in the Studio segment.
2. Exceptional work pressure for the translator increases the need for quality control.
3. The reviser/reviewer should change what has to be changed, not what could be changed.
4. Quality control creates an added value as knowledge transfer from experienced to less experienced staff and as a means of upholding an institutional voice in each language. The reviser/reviewer should therefore not refrain from suggesting improvements but should distinguish between corrections and suggestions.
5. If the reviser's competence profile is inappropriate (be it as regards domain competence, text type conventions or language skills) the resources spent on quality control might not be proportionate to the added value of the quality control intervention as such.
6. A reviewer without domain competence and appropriate text type convention competence is likely to do rather a proofreading than a proper review, i.e. a different and less reliable quality control measure.

3. General and specific translation quality criteria

All translated texts should comply with the general principles and quality requirements for professional translation laid down in the international standard ISO 17100. In brief, translation should be carried out keeping the purpose of the translated text in mind, respecting the linguistic conventions of the target language and relevant project specifications.[9]

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[8] Cf. ISO 17100, point 5.3.2 and Brian Mossop, *Revising and editing for translators*, St. Jerome, 2001, pages 167-173.

[9] ISO 17100, 5.3.1: 'Throughout this process, the translator shall provide a service conforming to this International Standard as regards: a) compliance with specific domain and client terminology and/or any other reference material provided and ensuring terminological consistency during translation; b) the semantic accuracy of the target language content; c) the appropriate syntax, spelling, punctuation, diacritical marks and other orthographical conventions of the target language; d) lexical cohesion and phraseology; e) compliance with any proprietary and/or client style guide (including register and language variants); f) locale and any applicable standards; g) formatting; h) the target audience and purpose of the target language content.'

The general principles apply slightly differently to different text categories. To help translators strike the right balance between 'source-text orientation' and 'target-text orientation', or between 'faithfulness to the original' and 'faithfulness to the purpose of the text' or 'respect for the reader', as it were, the following pages set out specific quality requirements and quality control guidelines for four main text categories, based on the purposes and risks involved:

A. Legal documents;

B. Policy and administrative documents

C. Information for the public;

D. Input for EU legislation, policy formulation and administration.

The guidelines apply independently of other document classifications used in DGT. Within each category, there may be texts or text genres with specific requirements.

Unless otherwise specified, and with the exception of text-category D, **translated texts should be fit for publication.**

ABCD quality advisers

QUALITY GUIDELINES
TEXT CATEGORY A: LEGAL DOCUMENTS

These guidelines apply to the following documents and document types:

1. EU legal acts: treaties, regulations, directives, decisions, recommendations, opinions, international agreements;

2. documents used in administrative or legal proceedings and inquiries, such as infringements, mergers, anti-trust, state aid and anti-dumping cases, e.g. submissions to the courts, letters of formal notice, reasoned opinions, statements of objection, etc.;

3. documents for procurement or funding programmes, tenders, grants applications, contracts;

4. recruitment notices and EPSO competition notices and test documents.[10]

1. SPECIFICATIONS FOR EU LEGAL ACTS

EU legal acts have a legal effect: they create rights, obligations and legitimate expectations. The readership, be it citizens or a court, must be able to act in complete confidence that the information in the document is reliable.

All language versions are equally authentic. They must convey the same meaning and produce the same legal effect in all languages and all legal orders. There must be no advantages or disadvantages for citizens, companies or Member States due to translation errors or discrepancies between language versions.

EU legal acts should comply with drafting rules, formalised formulations and templates in the *Joint Practical Guide (JPG)*, the *Manual of Precedents*, the *Joint Handbook for the presentation and drafting of acts subject to the ordinary legislative procedure*, the *Interinstitutional Style Guide,* language-specific style guides and Normative Memories, LegisWrite and other sector-specific templates.[11]

Terminology must be internally and externally consistent, i.e. it must be used coherently within the act itself (without synonyms or reformulations) and in line with any basic act(s) and any parallel acts. New terms should be created only as a result of a conceptual analysis. The conceptual scope of the terms must remain unchanged. In view of the special nature of EU law, concepts or terminology specific to particular national legal systems are to be used with care.

Clear and correct laws are a prerequisite for a functioning democracy. As laid down in the *JPG*, all language versions should comply with the general principles of law,

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[10] Strictly speaking, EPSO competition documents such as test papers are not legal documents, but they are part of a highly regulated process which culminates in recruitment decisions that have legal effect.

[11] All these reference guides can be found in English and French on the Drafter's Assistance Package website (http://www.cc.cec/wikis/display/dap/Legislative+drafting+resources); language specific style guides and other instructions can be found on the translation and drafting resources site (http://ec.europa.eu/translation/index_en.htm).

such as equality before the law (i.e. the law should be equally accessible and comprehensible for all) and legal certainty (i.e. it should be possible to foresee how the law will be applied).[12] Where the source text is formulated in such a way that it is impossible to meet these legal requirements in a language version, this should be pointed out to the requester or the Legal Service so that they can explore possible reformulations. Relevant information should be fed into Note/Elise.

Risks:

Translation errors and discrepancies create risks of litigation and financial, political and image-related damage. They may entail considerable extra work later in the legislative process, in working groups and in other EU institutions, including the cumbersome processing of corrigenda requests. They may also result in difficulties and problems -- and potentially errors -- of interpretation and implementation at the national level.

Keep in mind that Commission autonomous acts, unlike interinstitutional acts, do not normally undergo further quality control after release by DGT. As recalled in Greffe info No 70 concerning delegated acts, particular attention should be paid to the quality of translations, since correction of language versions during the period when the Council and Parliament can exercise their powers of scrutiny (the so-called «objection period») should be avoided.

Pay special attention to:
- translation memories: fed with legal basis, normative memories, reference legislation; retrievals and MT enabled for the remaining segments only;
- EU and national drafting conventions;
- terminology: internal and external consistency, conceptual scope;
- ambiguities: if it is unclear whether ambiguity is intended, ask the requester and check other language versions;
- basic legal acts and other reference legal acts, including treaties (for consistency in formulations and terminology);
- the sentence rule, i.e. language versions should have the same 'sentence boundaries';

Recommended minimum level of quality control:

Because of the legal and financial risks involved, with a limited number of exceptions[13], EU legal acts should always be subject to full revision. The combination of translator and reviser competences should ensure a high level of risk mitigation.

Even in situations of extreme work pressure, legal acts should be revised. For Commission autonomous acts there should be no exception to this rule. For interinstitutional acts, exceptions may apply under specific conditions. In such cases, it is of the utmost importance to indicate to EP and Council via Elise which

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12   *JPG* points 1.1 and 1.2.

13 E.g. versions of legal acts that are not binding, templates or standardized legal acts, etc.

parts of the legal acts have not undergone full revision. Revision should then focus on enacting terms, annexes and preambles (including recitals) – in that order. The combination of translator and reviser competences should still ensure a reasonable level of risk mitigation.

2. SPECIFICATIONS FOR DOCUMENTS USED IN PROCEEDINGS AND INQUIRIES

The *Interinstitutional Style Guide*,[14] language-specific style guides[15] and any relevant templates[16] should be applied. All authentic language versions must convey the same meaning. However, the sentence rule does not apply, so syntax can be modified where necessary. Guidance for leeway for editing while translating is provided in *The essential guide to drafting Commission documents on EU competition law*.[17]

Risks:

Translation errors and discrepancies create risks of litigation and financial, political and image-related damage. Huge financial interests can be at stake, so all documentation will inevitably be studied in great detail by lawyers. Decisions in such cases can be highly newsworthy. Translation errors may jeopardise years of investigation.

Pay special attention to:

- formulations, references and terminology used in earlier exchanges or procedural steps in the file[18] (also, make sure you are familiar with the procedure concerned);

- whether the translation is authentic (has legal effect) or is for information only.

Recommended minimum level of quality control:

Because of the legal and financial risks involved, with a limited number of exceptions[19], documents used in proceedings and inquiries should be subject to full revision.

In situations with extreme work pressure, the combination of appropriate translator and reviser competences should ensure a high level of risk mitigation through a combination of revision and review.

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[14] http://publications.europa.eu/code/
[15] http://ec.europa.eu/translation/index_en.htm
[16] https://myintracomm-collab.ec.europa.eu/networks/ABCD-QM/SitePages/DGT%20Templates%20Register.aspx
[17] http://www.essentialguide.eu/
[18] To ensure consistency, such exchanges should be made available to the translators, with the necessary precautions for confidential information.
[19] E.g. non authentic language versions or translations of very technical and/or sensitive documents for which a full revision can be better done by the Legal service or the requesting DG, at their request (this modus operandi is sometimes agreed with DG COMP for Commission Decisions, for instance).

3. SPECIFICATIONS FOR DOCUMENTS FOR PROCUREMENT OR FUNDING PROGRAMMES – TENDERS, GRANT APPLICATIONS, CONTRACTS

Procurement is a highly regulated area on (at least) four levels: global (WTO Agreement on Government Procurement), European (the Procurement Directive),[20] national (implementation rules) and at the level of the institutions (for which particular rules apply).[21] The terminology established at these respective levels should be used.

Procurement is big business, and the *minutiae* of tender specifications are scrutinised to ensure that the offer is tailored exactly in response. Specifications may be very technical, and the terminology must be correct, since all language versions must have the same meaning.

All parties to a contract must have the same understanding of it. The Commission's standard contracts for grants and procurement exist in all languages[22]. Although one language version will bear the actual signatures, the Commission official responsible and the contractor might use different versions to read and analyse the contract. Also, other (non-standard) contracts may exist in several language versions.

Risks:

A translation error or discrepancy that gives rise to misunderstanding may lead to court procedures and damages. Errors may also lead directly to distortions of competition and subsequent court complaints, which are expensive regardless of outcome. The court may annul the procurement or grants procedure, which is very costly and may jeopardise the allocated budget (allocations must be used within a certain time period).

Recommended minimum level of quality control:

Because of the legal and financial risks involved, with a limited number of exceptions[23], documents for procurement or funding programmes should always be subject to full revision. The combination of translator and reviser competences should ensure a high level of risk mitigation.

In situations with extreme work pressure, the combination of translator and reviser competences should still ensure a reasonable level of risk mitigation through a combination of revision and review.

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[20] Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC (OJ L 94, 28.3.2014, p. 65).

[21] Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council of 25 October 2012 on the financial rules applicable to the general budget of the Union and repealing Council Regulation (EC, Euratom) No 1605/2002 (OJ L 298, 26.10.2012, p. 1); see also DG BUDG's *Vademecum on Public Procurement*: https://myintracomm.ec.europa.eu/budgweb/EN/imp/procurement/Documents/vademecum-public-procurement-en.pdf.

[22] https://myintracomm.ec.europa.eu/budgweb/EN/imp/procurement/Pages/imp-080-030-010_contracts.aspx.

[23] E.g. text originating from templates or already established translations.

4. SPECIFICATIONS FOR RECRUITMENT NOTICES AND EPSO DOCUMENTS

EPSO documents are produced as part of a procedure that ends in a formal decision with a direct legal effect (recruitment), against which those affected have a right to appeal. The number of court cases centring on recruitment and competitions suggests that there is a high risk of disappointed candidates lodging complaints with the courts or the Ombudsman.

For test documents for EPSO competitions, the same challenges apply as for procurement and grant documents: translation errors may favour or disadvantage certain candidates. For example, an error in the translation of a question may cause candidates to give the wrong reply. An additional challenge is to ensure that the level of readability, ambiguity and cognitive difficulty is the same in all language versions; this may involve asking for reformulations.

Risks:

Factual errors, discrepancies or unclear formulations may disadvantage certain candidates, which may lead to complaints and in turn to court cases and the whole competition being declared null and void.

Recommended minimum level of quality control:

Because of the legal and financial risks involved, EPSO documents should always be subject to full revision, even in situations with extreme work pressure. The combination of translator and reviser competences should ensure a high level of risk mitigation. [24]

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[24] Good communication with EPSO during the proofreading meetings is important as well as a risk mitigation measure.

QUALITY GUIDELINES
TEXT CATEGORY B: POLICY AND ADMINISTRATIVE DOCUMENTS

These guidelines apply to the following documents and document types:

1. accompanying documents not formally part of legal acts: staff working papers, (summaries of) impact assessments, as well as non-binding parts of legislative documents such as financial statements or explanatory memoranda, etc.;

2. white and green papers;

3. other official administrative documents resulting from legal and political obligations and purposes, e.g. budget, reports, annual reports, guidelines and communications.

SPECIFICATIONS FOR POLICY AND ADMINISTRATIVE DOCUMENTS

The Commission produces these documents to explain its legislative proposals and political vision and choices, to convince readers that these are well-founded and justified. Readers can be expected to be familiar with EU matters in general and the specific topic in particular. They can also be expected to read the text as part of their work, i.e. not necessarily out of personal interest.

Translations should be accurate. Texts should provide factually correct and complete information and not distort the meaning of the source text. At the same time, to fulfil the aim of being persuasive, they should as far as possible read like originals in the target language. The focus should be on meaning rather than words, but attention should be paid to terminology. You do not have to follow the form or stick to sentence structures in the same way as for legislation. The message should be clear and the language idiomatic. To achieve this, sentences may be split, merged, restructured or reorganised.[25] Jargon should be used in a balanced way, keeping in mind the target audience and purpose of the text.

Language versions should comply with the drafting rules in the *Interinstitutional Style Guide*[26] and language-specific style guides[27] and take the advice in the *How to write clearly*[28] booklet.

Accompanying documents are part of the legislative packages transmitted to the legislating institutions and national parliaments. They are not binding like the legal act itself, but form part of the factual basis on which the institutions and parliaments[29] scrutinise Commission proposals. Although these documents lack the legal status of the act itself, they still need to be reliable and clear since they give rise to legitimate expectations. The reader must be able to interpret measures in legal acts in complete confidence that the accompanying information is reliable.

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[25] For guidance, see for instance Brian Mossop, *Revising and editing for translators*, St. Jerome, 2001, pp. 17-24, 60-73, 78, 80-86, 120.

[26] http://publications.europa.eu/code/

[27] http://ec.europa.eu/translation/index_en.htm

[28] http://www.cc.cec/translation/clear_writing/documents_en.htm

[29] National parliaments check whether the subsidiarity principle has been respected, in accordance with Protocol No 2 to the Treaty on the Functioning of the European Union.

There have been cases in which the European courts have based their interpretation of legal acts on explanatory memoranda, which are not formally part of a legal act.

Clarity and readability is particularly important for **white and green papers**, which usually form part of a wider public consultation. Public consultation is a formal part of the policy development process and may feed into legislative proposals.

Risks:

Errors and poor drafting risk damaging the EU's image and political credibility, and create misunderstandings that may complicate negotiations between the Member States. Poorly translated white and green papers may deter people from contributing to a public consultation, thus affecting the policy development process and jeopardising efforts to involve the public in EU issues.

Pay special attention to:

- previous or related documents on the subject (for consistency in formulations and terminology);

- new terminology (communications, white and green papers): this is the moment to get it right;

- target audience and purpose: who will read the text and why?

- life-span of the document: is it an *ad hoc* report (with limited readership) or a multi-annual strategy?

- logical presentation: clarity of argumentation, line of argument, fluency and naturalness of the text;

- critical parts/sections of the text, such as headings, introductions, first paragraphs, summaries, conclusions, critical pieces of information, etc.

Recommended minimum level of quality control:

Text category B documents can be subject to revision combined with review or to just full review, provided that the domain competence profile of the translator or the reviser matches very well with the text at hand. The combination of translator and reviser competences should ensure a reasonable level of risk mitigation. An exception to this rule are high profile documents such as white and green papers, multiannual strategy documents, highly political communications, for which full revision is recommended.

In situations with extreme work pressure, a decision can be taken to revise only key parts of the documents (introductions, conclusions, etc.), to replace revision with review (if the competence profile of the reviewer is appropriate) or skip quality control altogether (if the translation has been carried out under regular work pressure and provided that the competence profile of the translator was appropriate). Under these circumstances, the combination of translator and reviser competences should at least ensure a moderate level of risk mitigation.

Whenever less quality control has been applied than what the risk assessment calls for, this should be recorded, to ensure traceability.

QUALITY GUIDELINES
TEXT CATEGORY C: INFORMATION FOR THE PUBLIC

These guidelines apply to the following documents and document types:

1. press releases, memos;

2. articles for publication in the press, speeches, interviews;

3. leaflets, brochures, posters;

4. web texts.

SPECIFICATIONS FOR DOCUMENTS ADDRESSED TO THE PUBLIC

The Commission also wants to reach out to people who do not necessarily *have to* read about the EU as part of their work. Its communication objectives include bridging the gap between citizens and the EU and creating wider interest and trust in EU matters, so that citizens and stakeholders participate more in political processes at the European level and, not least, vote in European elections.[30]

To achieve this, information must not only be correct and reliable, it must also be presented in an accessible and attractive way. We must not alienate the readers.

The target text should present factually correct information and not distort the meaning of the source text. However, word-for-word translation or sticking closely to the surface structure of the original is seldom the way to go. The message should be clear and the language idiomatic so, if necessary, paragraphs and sentences may be split, merged, restructured or rearranged. Sometimes the semantic content or the rhetorical means used in the original may have to be modified to suit the audience.

Specific guidance with examples can be found in the *Guidelines for Better Press Releases*[31], the *Guidelines on how to write for the web*[32], in the *How to write clearly*[33] booklet and some language-specific guidelines.[34]

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[30] See, for example, *A New Framework for Cooperation on Activities concerning the Information and Communication Policy of the European Union* (COM(2001) 354), pp. 4-5: 'At the heart of Information and Communication policy is the obligation to bring Europe closer to its citizens. The structures and Institutions themselves must adapt to this imperative so that Europe is 'round the corner' with information that is clear, appropriate and in touch with real concerns.'; 'Ways must be found to overcome barriers to communication whether of a linguistic, cultural, political or institutional kind and taking full account of the differences between Member States: a European Public does not exist today for most purposes. We therefore have to adapt the message to convey according to the specificities of the public addressed.'; and the Commission's *Communication on implementing the information and communication strategy for the European Union* (COM(2004) 196): 'To be credible and effective, information and communication activities must reflect citizens' culture, language and concerns'.

[31] https://myintracomm.ec.europa.eu/dg/dgt/communicating/Documents/guidelines_press_releases.pdf

[32] https://myintracomm.ec.europa.eu/hr_admin/en/drafting/Pages/writing-web.aspx, for translation guidelines: https://myintracomm.ec.europa.eu/dg/dgt/translation/Pages/web.aspx

[33] http://www.cc.cec/translation/clear_writing/documents_en.htm .

[34] Access to LD sites see homepage DGTNet: https://myintracomm.ec.europa.eu/dg/dgt/Pages/home.aspx
LD language resources: http://ec.europa.eu/translation/index_en.htm

As regards the leeway for editing while translating[35], tap the competence of web translators and field officers. As with all other texts, when in doubt, consult other language versions or the author.

Risks:

EU jargon, overly formal, pompous and clumsy language or texts perceived as *translationese* will have a negative impact on the EU's image, thereby undermining the very purpose for which these documents were created. They also run the risk of 'zapping' readers (citizens and even media professionals), so that they don't look beyond the first paragraph, or even the headline.

Pay special attention to:

- **audience and purpose:**
  - who will use and read the text, why, when and through what medium (paper, web page, mobile media)? What is the reader supposed to think or do?

- **readability and naturalness:**
  - the target text should read like an original in the target language and comply with its text-type conventions; the impact in the target language is a key criterion for correct translation;
  - ask yourself how you would express the idea in your mother tongue; try where possible to use 'everyday language' and avoid jargon – a clear and fluent document is more likely to be read, less likely to be misunderstood and hence more effective;
  - address your audience/reader appropriately, avoid distancing the sender/text from the reader more than is typical of your language/culture; different target cultures and languages tolerate formal or grandiose expressions or decorative styles differently; reproducing the tone and rhetorics used in the original must not result in a pompous-sounding or even unintentionally funny target text;
  - keep in mind that critical parts/sections of the text, such as headings, introductions, first paragraphs, summaries, critical pieces of information will be read more carefully;
  - quotes should read naturally, in particular if the original statement would have been in your target language;
- **usability:**
  - 'for press releases, fact sheets ("memos") and OP-EDs, it is intended that the language register to be used by translators is one which would allow the immediate publication of the text in the national press, without further processing';[36]
  - slogans, 'brand names' and examples in leaflets, posters or brochures may need (cultural) adaptation.

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[35] Useful guidance can also be found in standard reference works such as Brian Mossop, *Revising and editing for translators*, St. Jerome, 2001, pp. 17-24, 60-73, 78, 80-86, 120.

[36] Quote from DGT's service-level agreement with DG COMM, point 4.6.

– spelling, numbers, dates and other key information in posters, on the cover pages of brochures or leaflets, etc. must be correct and comply with drafting conventions of the target text.

- **tools to improve target text quality:**

    – for web texts and press releases, if needed, consider simplifying quotes and syntax, rearranging information to focus on the key news content, splitting long paragraphs, highlighting information concerning the country(ies) concerned, adapting headlines and headings to state the key issue in a catchy manner (it may be a good idea to translate the headline/headings last), etc.

Localisation:[37]

'Localisation' is a process of dealing with culture- and situation-specificity. It involves estimates and choices as to:

i. what is relevant, significant and interesting for a target audience;

ii. what is familiar and understandable to it;

iii. what is compatible with its general values, beliefs and interests; and

iv. how the message should be formulated structurally, stylistically, rhetorically, argumentatively, typographically, etc. to produce a text that meets the needs and expectations of the target audience, as well as generates interest and, possibly, action.

'Localisation' in the sense of adapting the texts to the target audience, culture, drafting and genre conventions and 'locale'[38], to ensure that they fulfil their purpose and have the intended impact, is a natural part of translating any text.

But constraints vary: while there is only limited leeway for 'localising' category A texts, category B texts leave some more room for manoeuvre, and for category C texts there is an even wider selection of textual tools available for improving the usability and readability of translations. However, the translator cannot be expected to carry out extensive localisation or completely re-write texts, not even information for the public, unless explicitly asked to do so.

In practice, we normally speak of 'localisation' (in the sense of a more systematic application of the above-mentioned measures to edit and adapt texts) when referring to the translation and editing of press material by field officers in the representations working in close contact with press officers. Such localisation not only involves adapting titles and headlines and deleting locally less relevant information, but also adding locally relevant information found outside the source text.

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[37] As defined in a DGT report on press releases in 2007 (p. 10) (https://myintracomm-collab.ec.europa.eu/networks/ABCD-QM/SiteAssets/SitePages/Archive/FINAL_Report%20Press%20Releases.pdf)

[38] ISO 17100: Locale: set of characteristics, information or conventions specific to the linguistic, cultural, technical and geographical conventions of a target audience and regional standards.

From a 2007 report on Commission press releases[39]:
'In practice, operations necessitated by localisation may include:

- selection of the location of text production;
- selection of texts to be translated and published (based mainly on relevance, importance, interest and proximity considerations);
- deletion or addition of text elements, based mainly on relevance, importance or familiarity/understandability considerations; these may include deletion of irrelevant or generally known pieces of information, addition of explanatory elements, addition of locally relevant, important or interesting pieces of information (which may originate in sources other than the source text), addition of quotes from locally important people, etc.);
- structural reorganisation (relocation of text elements to change the order of importance, focus or perspective, or to take into consideration target-culture textual conventions; changes of sentence structures to, e.g., improve target text readability);
- reformulation of text elements (to adapt style, rhetoric, argumentation and other text features to target culture conventions or to take into account ideological considerations);
- changes in typography (to adapt, e.g., layout to target cultural conventions).'

Recommended minimum level of quality control

With the exception of high impact documents such as articles for publication in the press or press releases on topics sensitive for the member state of the language in question, for which full revision is recommended, documents with information for the public can be subject to revision combined with review or just full review, provided that the domain competence *and* the text type convention competence profile of the translator or reviser/reviewer matches very well with the text at hand.

In situations with extreme work pressure, a decision can be taken to revise only key parts of the documents (introductions, conclusions, etc.), to replace revision with review (if the competence profile of the reviewer is appropriate) or skip quality control altogether (if the translation has been carried out under regular work pressure and provided that the competence profile of the translator was appropriate).

Whenever less quality control has been applied than what the risk assessment calls for, this should be recorded, to ensure traceability.

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[39] https://myintracomm-collab.ec.europa.eu/networks/ABCD-QM/SiteAssets/SitePages/Archive/FINAL_Report%20Press%20Releases.pdf

QUALITY GUIDELINES
TEXT CATEGORY D: INPUT FOR EU LEGISLATION, POLICY FORMULATION AND ADMINISTRATION

These guidelines apply to the following documents and document types:

1. Member State legislation implementing EU legislation;

2. Member State (government or parliament) political opinions on COM policies in the preparation of EU legislation, proceedings, infringements, etc.;

3. Member State (government, central or regional) mandatory reports (obligation deriving from EU legislation);

4. Member State (government or agency) mandatory notifications or applications of national plans, for certification, etc. ;

5. Member State (government, central or regional) replies to Commission requests for information or assistance;

6. documents received from other stakeholders (NGOs, companies, federations, associations, Ombudsman, etc.);

7. correspondence from citizens; news articles for information;

8. documents or correspondence from non-EU countries, third-country governments, international agreements, external bodies; material in EU or non-EU languages.

SPECIFICATIONS FOR INPUT FOR EU LEGISLATION, POLICY FORMULATION AND ADMINISTRATION

Most incoming documents are submitted by Member States or other external parties in the course of the same formal (administrative) procedures that involve the text categories A and B indicated above. They are normally intended for internal use and not for publication. Whether they introduce a new request for the Commission to take action or respond to questions or issues raised by the EU institutions, these documents act as a catalyst for much of the Commission's work and feed into subsequent texts produced internally by the Commission.

To a large extent, therefore, the same guidelines and quality requirements apply to these documents as to the corresponding documents of the other categories. This is in particular true for text types A.2 (administrative and legal proceedings and inquiries) and B (policy formulation and administration). In view of the fact, however, that the purpose of the texts and the related risk of translation errors usually are different from category A, B and C documents, not all aspects apply to the same degree. For instance, translation of Member States' legislation is for analysis and information purposes (cf. A.2) and legal implications of translation errors are therefore indirect. The translated legislation does not become applicable law (cf. A.1). Press articles are translated for information and not to be published in the press, etc.

Risks:

The cost of mistranslation can be significant and lead to reputational damage and even legal implications if the Commission misunderstands national legislation and launches inquiries on that basis. Also, poor translations are an obstacle to the efficient working of the Commission, cause delays, impede the analysis of input or (administrative, legal, technical, financial, etc.) evidence and could even constitute a breach of the Member States' and other parties' right to address the Commission in their own language.

Pay special attention to:

Depending on the nature of the incoming document, it might be the 'counterpart' to an existing (or future) category A, B or C document. Therefore, the translator needs to be aware of the purpose of the translation and follow the guidelines outlined above for the appropriate text category.

The wording of incoming documents often feeds directly into the drafting of Commission texts. Reference material must be taken into account particularly in the case of notifications and replies from external parties, as the terminology used must be consistent with that in the Commission's original communication.

In an exchange of letters, keep track of the whole process and make accurate quotations from previous correspondence where needed.

ⓘ Letters from private individuals and external news articles for information (collectively known as CLAPs) come under the portfolio of the source language department (except in the cases of FR and DE) and are usually handled as reverse translation into English.

Recommended minimum level of quality control:

For text category D documents, the quality requirements are determined by the exact purpose of the text. When it corresponds to documents in text categories A, B and C, also corresponding quality requirements apply, with the exception that most input is for internal use and not for publication. The risks associated with documents related to EU and Member State legislation or legal proceedings are usually high and warrant a treatment as under A.1 and A.2 above. Texts intended for information, letters from citizens and third countries etc. usually can do with less or no revision and provided that the domain and language competence profile of the translator matches very well with the text at hand.

In situations with extreme work pressure, a decision can be taken to revise only key parts of the documents (introductions, conclusions, etc.), to replace revision with review (if the competence profile of the reviewer is appropriate) or skip quality control altogether (if the translation has been carried out under regular work pressure and provided that the competence profile of the translator is appropriate).

Whenever less quality control has been applied than what the risk assessment calls for, this should be recorded, to ensure traceability.

Quick reference card for (workflow) managers on risk assessment and the decision to take on quality control

Categories	Title	Recommended quality control
A - Legal documents		
A1	EU legal acts: treaties, regulation, directives, decisions, recommendations, opinions, international agreements	Full revision. Best possible combination of translator and reviser competences Even in situations with extreme work pressure, legal documents should be revised. For Commission autonomous acts there should be no exception to this rule. For other legal documents exceptions may apply to for instance language versions that are not binding, templates or standardized parts of legal acts or procurement documents, or translations of very technical and/or sensitive documents for which a full revision can be better done by the Legal service or the requesting DG, at their request[40]. Under extreme circumstances, the appropriate combination of translator and reviser/reviewer competences should still ensure a reasonable level of risk mitigation for revision combined with review. For inter-institutional acts, if parts of a legal act has not been fully revised, the other institutions should be informed via Note/Elise.
A2	Documents in administrative or legal proceedings and inquiries, such as infringements, mergers, anti-trust, state aid and anti-dumping cases (Procedural docs for CoJ) General Court and Civil Service Tribunal, national courts (mémoire)	
A3	Documents for procurement or funding programmes, tenders, grants applications, contracts	
A4	Recruitment notices, EPSO competition notices and test documents	
B - Policy and administrative documents		
B1	Accompanying documents not formally part of legal acts: staff working papers, COM working documents, (summaries of) impact assessments, as well as non-binding parts of legal acts such as financial statements or explanatory memoranda	Revision combined with review or just full review, provided that the domain competence profile of the translator or the reviser/reviewer matches very well with the text at hand. Exception: high impact documents such as white and green papers or multiannual strategy documents: full revision. In situations with extreme work pressure • revise only key parts of the documents (introductions, conclusions, etc.), or • replace revision with review (if the competence profile of the reviewer is appropriate) or • skip quality control, partly or altogether (if the translation has been carried out under regular work pressure and provided that the competence profile of the translator was appropriate).
B2	White papers, green papers	
B3	Other official administrative documents flowing from legal and political obligations and purposes, e.g. reports and communications	
C - Information for the public		
C1	Press releases (PP) Memos	Revision combined with review or just full review, provided that the domain competence *and* the text type convention competence profile of the translator and reviser/reviewer match very well with the text at hand. Exception for high impact documents such as articles for publication in the press or press releases on topics sensitive for the member state of the language in question: full revision. In situations with extreme work pressure revise only key parts of the documents (introductions, conclusions, etc.), replace revision with review (if the competence profile of the reviewer is appropriate) or skip quality control, partly or altogether (if the translation has been carried out under regular work pressure and provided that the competence profile (domain and text type) of the translator was appropriate).
C2	Articles for publication in the press, speeches, interviews	
C3	Leaflets, brochures, posters	
C4	Web texts	
D - Input for EU legislation, policy formulation and administration		
D1	Member State legislation implementing EU	Quality requirements are determined by the exact purpose of the text:

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[40] This modus operandi is sometimes agreed with DG COMP for Commission Decisions, for instance.

Categories	Title	Recommended quality control
	legislation	For documents corresponding to documents in categories A, B and C, also corresponding quality requirements and quality control apply (but usually for internal use and not for publication, although they often serve as basis for the drafting of Commision documents).
D2	Member State (government or parliament) political opinions on COM policies in the preparation of EU legislation, proceedings, infringements, etc.	
D3	Member State (government, central or regional) mandatory reports (obligation deriving from EU legislation)	Category D1 should be translated internally, where possible; category D2 feed directly into the drafting/preparation of EU legislation; category D3 has a potential legal impact; category D.5 may be used in follow-up texts drafted by Commission officials.
D4	Member State (government or agency) mandatory notifications or applications of national plans, for certification, etc.	In situations with extreme work pressure revise only key parts of the documents (introductions, conclusions, etc.), replace revision with review (if the competence profile of the reviewer is appropriate) or skip quality control, partly or altogether (if the translation has been carried out under regular work pressure and provided that the competence profile of the translator is appropriate).
D5	Member State (government, central or regional) replies to Commission requests for information or assistance	Texts intended for information, letters from citizens and third countries etc. usually less or no revision and provided that the domain and language competence profile of the translator matches well with the text at hand.
D6	Documents received from other stakeholders (NGOs, companies, federations, associations, Ombudsman, etc.)	For non-procedural languages, special rules apply depending on the direction of translation (from or into a non-EU language) and, for translations into a non-EU language, on the accidental availability of native capacity in –house which could vouch for the accuracy of the translations. Where such capacity does not exist, a light evaluation will be provided by the target language department which cannot provide any guarantee of correctness to the requester (who will have to be informed of the level of quality control DGT can or cannot provide).
D7	Correspondence from citizens; news articles for information	
D8	Documents or correspondence from non-EU countries, third-country governments, international agreements, external bodies; material in EU or non-EU languages	

Quick reference card for translators and revisers/reviewers

Categories	Title	Risks	Important aspects
A - Legal documents			Accuracy and formal drafting rules may take precedence over readability and fluency
A1	EU legal acts: treaties, regulation, directives, decisions, recommendations, opinions, international agreements	Legal, financial, political	Style Guides and Drafting Guidelines (JPG, MoP, DAP). Template, if such exists. Consistency between language versions. When in doubt, check other language versions. Consistency between related legal acts. Check basic act for terminology and formulations. New terminology: verify definitions, avoid synonyms, consult national experts. Ambiguity: intended or unintended? Inconsistencies, errors or non-compliance with drafting instructions: report to author and ask for new version. If no new version, ensure via Note that all languages opt for same solution/interpretation. N.B. For Commission implementing acts, there is no further QC after DGT.
A2	Documents in administrative or legal proceedings and inquiries, such as infringements, mergers, anti-trust, state aid and anti-dumping cases (Procedural docs for CoJ) General Court and Civil Service Tribunal, national courts (mémoire)	Legal, financial, political	References to and quotes from EU and national legislation References to and quotes from earlier correspondence in the file Facts and legal assessments Template, if such exists. Style Guides and Drafting Guidelines.
A3	Documents for procurement or funding programmes, tenders, grants applications, contracts	Legal, financial	Procurement rules and terminology.

Categories	Title	Risks	Important aspects
A4	Recruitment notices, EPSO competition notices and test documents	Legal, financial, political	Degree of difficulty of competition questions.
B - Policy and administrative documents			Accuracy and readability are equally important for high impact documents
B1	Accompanying documents not formally part of legal acts: staff working papers, COM working documents, (summaries of) impact assessments, as well as non-binding parts of legal acts such as financial statements or explanatory memoranda	Political, image	Template, if such exists.
B2	White papers, green papers	Political, image	Target audience and purpose Large readership, large life span: Idiomatic language use New terminology
B3	Other official administrative documents flowing from legal and political obligations and purposes, e.g. reports and communications	Political	Related documents
C - Information for the public			Text type conventions, readability and cultural considerations may take precedence over completeness
C1	Press releases (PP) Memos	Image	Readability (clear drafting, guidelines) Guidelines (press releases) Will the press release go directly to print or be edited by a press officer?
C2	Articles for publication in the press, speeches, interviews	Image	Readability (clear drafting, guidelines) Target audience and purpose. Will the article go directly to print or be edited by a press officer?

Categories	Title	Risks	Important aspects
C3	Leaflets, brochures, posters	Image	Readability (clear drafting, guidelines) Target audience and purpose. Inform requester if examples are unfortunate and need adaptation.
C4	Web texts	Image	Readability (clear drafting, guidelines) Guidelines (web) Fit within surrounding text environment on the site Fitness for internet browsers (use of key words)
D - Input for EU legislation, policy formulation and administration			When related to A, B or C documents, be aware of the guidelines for the appropriate text category. Letters from private individuals and external news articles for information come under the portfolio of the source language department (except in the cases of FR and DE) and are usually handled as reverse translation into English.
D1	Member State legislation implementing EU legislation	Legal	Accuracy, legal terminology
D2	Member State (government or parliament) political opinions on COM policies in the preparation of EU legislation, proceedings, infringements, etc.	Political	Often feeds directly into the drafting of Commission texts.
D3	Member State (government, central or regional) mandatory reports (obligation deriving from EU legislation)	Legal, financial	References, ambiguity.
D4	Member State (government or agency) mandatory notifications or applications of national plans, for certification, etc.	Legal, financial	Templates, if applicable.
D5	Member State (government, central or regional) replies to Commission requests for information or assistance	Legal, political	Possible legal implications. Consult reference material and wording of the Commission's request (and any additional prior correspondence).

Categories	Title	Risks	Important aspects
D6	Documents received from other stakeholders (NGOs, companies, federations, associations, Ombudsman, etc.)	Political, image	Context. Terminology. Often difficult or obscure originals.
D7	Correspondence from citizens; news articles for information	Image	Local know-how or specific cultural knowledge may be required.
D8	Documents or correspondence from non-EU countries, third-country governments, international agreements, external bodies; material in EU or non-EU languages	Political, Image	Context. Terminology. Often difficult or obscure originals.

Quick Reference Card – Risk Mitigation

Example of risk mitigation practices

To minimise the risks associated with each text type, translation and revision tasks are assigned to translators and revisers/reviewers with the most appropriate competence profiles for the text at hand. High workload will not always allow for this, but ideally combined competences of translators and revisers will mitigate the risks. Figures 1 and 2 show minimum quality control measures under normal and exceptional circumstances for the text categories A, B, C and D. The axes represent the competence profiles of translator resp. reviser/reviewer (or partial revision or review/no revision). The matrix indicates the accumulated risk mitigating effect (red means the risk is still high, green that it has been mitigated) and A, B, C and D indicate the recommended minimum level of risk mitigation for the different text categories (with an added distinction between D texts implying legal risks and other).

The risk level and the corresponding risk mitigation level may of course be either higher or lower than indicated, since texts are diverse and risk levels may vary also within each text type. It is always up to the head of unit or work flow manager to assess the actual risk level of each individual text and assign translation and quality control tasks accordingly.

Figure 1: Risk mitigation under normal circumstances

Reviser profile		Less good match with text	Good match with text	Excellent match with text
Excellent match with text		A		
Good match with text		B, D(legal)	A	
Less good match with text		C, D(other)	B, D(legal)	A
Partial revision or review			C, D(other)	B, D(legal)
No revision				C, D(other)
		Translator profile		

Figure 2: Risk mitigation under exceptional circumstances

Reviser profile		Less good match with text	Good match with text	Excellent match with text
Excellent match with text				
Good match with text		A		
Less good match with text		B, D(legal)	A	
Partial revision or review		C, D(other)	B, D(legal)	A, B
No revision			C, D(other)	B, C, D
		Translator profile		