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COMMUNICATION TO THE COMMISSION

**TRANSLATION AS PART OF THE COMMISSION'S DECISION-MAKING
PROCESS**

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1 PURPOSE OF THE COMMUNICATION

This Communication replaces the 2006 Communication *Translation in the Commission*¹ and sets out further measures to improve the integration of translation in the Commission's decision-making process by increasing corporate discipline. The aim is to make that process more efficient so that translation resources are put to the best possible use and produce maximum impact.

Rules have applied to translation in the Commission since 2001, when the objectives were to simplify the linguistic aspects of Commission procedures and to reduce translation volumes to cope with a steady increase in demand.² The linguistic sea-change triggered by the 2004 enlargement heightened the need to match translation demand to available resources by limiting the number of language versions and the length of certain types of documents.³ These rules were maintained, with some adjustments, in 2005⁴ and then, in 2006, adapted with a view to establishing a more flexible and sustainable model for the years to come. It is now time to update the translation strategy outlined in the 2006 Communication in line with the Commission's drive for better regulation and increased efficiency.

2 EVALUATION OF THE 2006 COMMUNICATION

The demand management measures set out in the 2006 Communication involved:

- establishing and prioritising **categories** of documents to be translated; and
- laying down rules on **document length** and the number of **language versions**.

These measures have proved effective. They have enabled the Commission to respond to the increased demand for translation in a cost-efficient way and focus resources on meeting its legal obligation, as set out in the Treaties and in Council Regulation No 1 of 15 April 1958, to provide legislation in all official languages.

The Communication promoted a diversification of the products and services offered by DG Translation (DGT), including translation for the web, 'localisation' of the Commission's messages and the editing of originals, in order to ensure that citizens have prompt access in their own language to sufficient information about EU matters and that Commission texts are as concise and clear as possible.

The Communication also improved the planning of translation work by advocating the conclusion of service-level agreements (SLAs) between DGT and customer DGs, as recommended by the European Court of Auditors,⁵ articulating specific needs and

¹ SEC(2006) 1489 final.

² SEC(2001) 2031 and SEC(2002) 382.

³ SEC(2004) 638/6.

⁴ SEC(2005) 984/3.

⁵ Special Report No 9/2006 concerning translation expenditure incurred by the Commission, the Parliament and the Council, together with the institutions' replies (OJ C 284, 21.11.2006, p.1-39).

expectations as regards the operational aspects of translation. SLAs enhance the transparency and cost-effectiveness of the overall demand for translation in the Commission and recognise DGT as its hub for translation and other language-related services.

The above measures and overall strategy remain valid, but implementation has shown that some adjustments are needed to improve efficiency and handle the continuing rise in demand for translation in a context of limited resources.

Section 3 describes the range of language services that DGT provides to Commission DGs to meet their changing needs and section 4 lists eight improvement measures.

3 MEETING NEW NEEDS FOR TRANSLATION AND LANGUAGE-RELATED SERVICES

A high-quality translation service is of the utmost importance for the legal certainty of the Commission's regulatory activity, for its multilingual written communication and therefore for the legitimacy of its work.

In addition to **translating legislation**, correspondence and other texts drafted by or addressed to the Commission, DGT has **diversified its language-related services** over the years to include:

- translation and editing for the web;
- the localisation of the Commission's communication products (i.e. adapting messages to local audiences);
- the editing of original documents to improve quality and clarity (Commission documents are often drafted by non-native speakers);
- alternatives to full translation (e.g. oral and written summaries, machine translation, post-edited machine translation); and
- advice on language coverage, in particular for public consultations and for the Commission's websites.

DGT is committed to adapting to DGs' translation needs and providing new products and communication tools, in particular web-based platforms. To this end, it pursues close **customer relations** to gain a deeper insight into each DG's overall work cycle and communication channels, and to better anticipate, plan and deliver translation and language services, while maintaining the efficient use of its own in-house, external and technological resources.

DGT runs a **machine translation** system (MT@EC), which is available to all EU officials and public administrations in the Member States. MT@EC is a data-driven system that covers 552 language combinations and makes extensive use of DGT's translation memories, which probably make up the world's biggest archive of high-quality human translation. The system is designed to give readers a basic and instant understanding of a text. It is also used by online services funded or supported by the Commission such as the Internal Market Information system, the Tenders Electronic Daily portal, or the e-Justice portal to facilitate the rapid exchange of information across borders by overcoming language barriers.

MT@EC is also the basis for the Automated Translation (CEF.AT) platform that is developed with funding from the Connecting Europe Facility to support multilingual needs in the CEF context. DGT is the solution provider of this platform and is working

closely with DG CNECT and DIGIT to improve the speed, linguistic quality and relevance of the machine translation output.

As a corporate tool, MT@EC allows for information to be processed safely, thus guaranteeing confidentiality of data and protecting the Commission's intellectual property rights.

In view of the challenge of handling a constant increase in translation demand and the need to deliver high quality translations, while making efficient use of its human and financial resources, DGT's business model involves **outsourcing** part of its production to highly qualified contractors, selected and managed in line with public procurement rules. Given the Commission's legislative role and the need for linguistic concordance across legal texts, DGT aims, where possible, to translate legal and related political documents internally. However, given the pressures described, DGT will explore the scope for a more systematic and pro-active use of outsourcing and any related efficiency gains.

In summary, the aim of DGT's translation strategy, backed up by SLAs with its customer DGs and services, is to meet the Commission's translation needs in a balanced, cost-efficient way. It draws on all available resources, matches demand and purpose to capacity, and applies a comprehensive quality assurance policy.

4 BETTER REGULATION REQUIRES BETTER TRANSLATION PLANNING AND DISCIPLINE: EIGHT MEASURES TO INCREASE EFFICIENCY

Better regulation is about designing laws so that they achieve their objectives in the most efficient and effective way possible. This encompasses the quality of output (EU legislation) and of the underlying decision-making process. One of the keys to better regulation is good **planning**. This involves taking into account procedural requirements from the earliest stages of the decision-making process. In the EU's multilingual environment, these include translation, since linguistic quality and legal accuracy (and hence legal certainty and multilingual concordance) are essential requirements in EU legislation across all language versions.

Although the Commission's decision-making is multilingual and translation is part and parcel of it, there are no clear rules setting aside time in the process for translation – unlike inter-service consultation (ISC), for example. Because the translation stage is typically factored in only towards the end of the document workflow, it is often compressed to make up for delays in drafting. To ensure timely delivery, DGT often has to start translating texts that are unstable, e.g. still in ISC or yet to be checked by legal revisers. As a consequence, some original content is dropped or amended and DGT may have to translate multiple revised versions, which amounts to an inefficient use of resources.

In an overall context of increasing demand and shrinking budgetary and human resources, making the **best use of translation resources** is the **shared responsibility** of DGT and other Commission services. A stronger **collective effort for corporate discipline** is required to factor translation properly into the Commission's overall decision-making process, in order to ensure the quality of its multilingual communication. This should be achieved through a number of measures:

- 1) closer customer relations;
- 2) integrating translation into corporate planning tools;

- 3) clearer, differentiated translation deadlines;
- 4) better timing: starting translation only after ISC;
- 5) shorter documents: enforcing rules on document length;
- 6) better originals: more editing;
- 7) simplifying the classification of documents for translation purposes; and
- 8) clear criteria for ‘non-core’ translations.

4.1 Closer customer relations

In 2013, DGT set up a **customer relations service** to foster closer relations with customer DGs and improve mutual understanding in order to identify, jointly and as far upstream in the decision-making process as possible, the most appropriate and cost-effective solutions to meet their needs for translation and language services.

All demand management activities for standard translation, web translation and editing services were consolidated into the remit of the new service, which was to act as a **single entry point** dealing with the operational side of translation (e.g. negotiating deadlines, monitoring the arrival of documents, addressing problems relating to specific files, etc.). To improve forward planning, the customer relations service liaises with translation correspondents and management in the customer DGs and collects information from Agenda Planning, DGs’ quarterly forecasts and Decide Consultation.

To upgrade and strengthen its partnership with customer DGs, DGT has given language department heads a new **portfolio manager** role. The ongoing contacts feed into a strategic overview of the main initiatives in the pipeline, raise DGs’ awareness of the importance of planning and preparing the translation phase and generate feedback on DGT services, including suggestions for improvement.

4.2 Integrating translation into corporate planning tools

To achieve the above aims of better planning and corporate discipline, the translation phase must be visibly integrated into all relevant corporate planning tools.

A major improvement of the Commission’s overall planning cycle has come with the introduction of Decide, an all-in-one system designed to handle the whole decision-making process and to streamline the flow of files and information from planning, through consultation to final decision.

Decide shows all the steps of the decision-making process, thus enabling users to follow the progress of individual files. A planning simulator helps DGs to calculate how long it will take to prepare a file, with timeframes for the various stages of the process. This includes translation: the system factors in the time needed for translation on the basis of DGT’s current indicative deadlines and the estimated length of uploaded documents.

A more formal acknowledgement of the translation phase in the overall decision-making process, depending on the adoption procedure (see section 4.3) would improve operations even further. A better technical integration between Decide and Poetry, the workflow system that DGs use to submit translation requests to DGT, would pave the way for further automation and a more efficient exchange of information.

The same applies to other corporate workflow tools that involve a translation stage, such as the workflow system in Drupal to manage the production of digital content for the Europa website and any future multilingual portals or systems.

4.3 Clearer, differentiated translation deadlines

DGT delivers its products and services to *indicative* deadlines applied to all documents on the basis of their length. These deadlines are set out in the SLAs with customer DGs and published in GoPro,⁶ but they are often compressed as a result of delays in drafting. DGs sometimes consider deadlines for some priority documents, such as those to be discussed by the College, too long.

In response to these pressures, DGT has **reviewed the current set of translation deadlines** as follows (see Annex 1 for details):

4.3.1 Oral procedures, expedited and urgent written procedures: faster translation to meet the most pressing political needs

DGT will apply deadlines that are shorter than the current indicative deadlines where documents are to be adopted by **oral procedure** (corresponding mainly to items of major political or economic importance)⁷ and **expedited or urgent written procedure** (i.e. files where exceptional, unforeseen circumstances call for a faster turnaround), but not to make up for administrative delays. Such deadlines may be brought forward further where the requesting DG and DGT agree that there is a real political need to do so.

4.3.2 Ordinary written procedures: faster translation with more corporate discipline

DGT will also apply shorter deadlines for the translation of documents to be adopted by **ordinary written procedure**, but only if stable texts are submitted after ISC (otherwise standard deadlines will apply). In principle, these deadlines cannot be shortened further and will apply from the date the files are submitted to DGT (in other words, if a file is not submitted on time, the adoption date will also have to be pushed back). However, flexibility will be applied on a case by case basis, e.g. where there are legal deadlines.

4.3.3 Other documents: keeping the current indicative deadlines

For the **remaining adoption procedures (empowerment and (sub)delegation) and other documents** not to be adopted by the Commission, the current indicative deadlines will continue to apply, to be negotiated as usual between DGT and customer DGs, with flexibility on both sides.

⁶ See [GoPro — Guide to Commission procedures](#).

⁷ This includes documents adopted by the College concerning the organisation of its meetings, i.e. agendas (OJ) and minutes (PV).

4.4 Better timing: starting translation only after ISC

Recent analyses have shown that an increasing proportion of DGT's translation workload is generated by requesters submitting revised versions of documents. Documents are sent for translation before drafting is complete and subsequent amendments lead to revised versions and new translation requests. This is particularly commonplace with legislative documents and often stems from poor planning and drafting, which lead to an inefficient use of Commission resources.

Therefore, as a general rule, translation should start only on the consolidated text resulting from the **ISC** or (for non-ISC documents) only when a **stable, final version** of the text is available. Derogations should be the exception and be duly justified.

In addition, as a general rule, **amendments** to texts in the course of translation should be **kept to a minimum** (e.g. limited to the adoption phase).

Better planning by DGs to avoid translation during ISC, thus restricting the occurrence of revised versions to the absolute minimum, will contribute to a more efficient use of translation resources. It will also improve translation quality: since the deadlines remain fixed, submitting revised versions increases pressure on translators and leaves less time for the all-important quality control.

4.5 Shorter documents: enforcing rules on document length

DGT will rigorously enforce the rules on document length (see Annex 2) and take a strict line on derogations.

Concise, clear documents have a better impact: imposing restrictions on document length not only saves readers' time but also contributes to a more efficient use of the Commission's translation resources.

4.6 Better originals: more editing

Managing the quality of EU regulation also entails ensuring that texts are as concise, clear and accessible as possible, thus making compliance as easy as possible. It is, therefore, essential that the Commission produces **clear** content. DGT offers support in this area at various stages:

- clear-writing training for officials before they start drafting;
- an editing helpline offering prompt assistance during the drafting process; and
- an editing service for complete documents (i.e. full documents, rather than excerpts).

The benefits are evident: greater clarity of language helps avoid (potentially costly) misunderstandings and ambiguities, saves time in the consultation process and makes documents more understandable and more relevant to readers. In particular, documents pertaining to the current Commission's 10 priorities and, in general, to the Commission work programme or major/flagship initiatives should be sent to DGT for editing, ideally before ISC.

Authors should also be made aware of, and use, other forms of editorial support available in the planning and IT environment in which the Commission operates. Currently, translation memories and other linguistic assets are used mainly by translators, but these

and other resources could be of benefit along the entire drafting-translation-publishing chain. The future corporate Decide drafting module (successor of LegisWrite) will provide an online working environment for authors and represent a unique opportunity for the Commission to support drafting with built-in linguistic tools. The seamless integration of DGT's vast and reliable linguistic resources⁸ and tools with the drafting module and with workflow tools to create digital content would help authors improve their drafting, facilitate the translation process and improve the quality of content for end users.

4.7 Simplifying the classification of documents for translation purposes

Since some new types of text have been introduced while some existing types have become obsolete, this Communication sets out a new classification of documents for translation (see Annex 2). In particular, the Commission's emphasis on carrying out more public consultations and impact assessments on its key proposals, as well as evaluations and fitness checks of legislation, may have implications for translation demand.

There are no changes with respect to the 2006 Communication as regards the language regime applicable to the various types of text or to the volume limits.

4.8 Clear criteria for 'non-core' translations

Service-level agreements provide a framework for translating 'non-core' documents⁹ or texts for which translation is not mandatory, but regarded by the customer DG as necessary or useful. Hitherto, following negotiations with individual customer DGs, such translations have been included in the SLAs in question in Annex 8A (translations normally included in DGT's internal workflow or outsourced under the DGT budget) or Annex 8B (translations to be outsourced and charged back to the customer DG).

To manage translation demand more consistently across DGs and follow DG BUDG guidance on internal charge-back arrangements, translations of documents and information material in categories 2.9 and 2.10 of the new classification (**non-core documents**) will as a general rule be charged back to the customer DG and thus included in Annex 8B to the respective SLA.¹⁰ Otherwise, the main principles guiding the negotiation of the SLAs between DGT and the customer DGs remain unchanged.

This charge-back mechanism will contribute to raising awareness among DGs about the cost of translation and encourage them to limit their demand for language products to what is really necessary. At the same time, it will enable DGs to benefit from DGT's expertise, services and network (translation, revision, text pre-processing, established outsourcing practices, use of selected freelancers) for translations which would otherwise not be provided by DGT.

⁸ Including translation memories, terminology, editorial support and drafting guidance.

⁹ These include guidelines (other than those adopted by the Commission pursuant to a legal obligation), leaflets, booklets, handbooks, studies, minutes and agendas of meetings (other than Commissioners' weekly meetings), newsletters, speeches, articles, presentations and other non-core documents relating to the work of the Commission.

¹⁰ In principle, documents of 10 pages or fewer – except for those which are part of series or 'families' of documents of a considerable total volume – need not be included in Annex 8A or 8B of the SLA. Their translation will be decided upon case by case.

5 CONCLUSION

With this Communication, which replaces the 2006 Communication and all previous translation strategies, DGT aims to promote the efficient use of translation resources, in particular by better integrating translation into the Commission's decision-making process. DGT intends to achieve this by tapping the potential of corporate planning tools, translating fewer unstable documents, enforcing rules on document length and aligning translation deadlines more closely to political needs.

High-quality translation remains essential if the Commission is to operate effectively and engage with citizens throughout the EU in all official languages. In light of the Commission's and the other institutions' drive for better regulation, this high-quality translation starts with the drafting of clear original texts, supported by editing and legal revision.

Annex 1: Translation deadlines

Annex 2: Classification of documents for translation purposes (including volume restrictions and language regime)