

Brussels, 16 November 2016



OPEN LETTER TO MR R. MARTIKONIS, DIRECTOR GENERAL DGT

Subject: The situation at DGT: What is at stake is of everybody's business at the European Commission

Dear M. Martikonis,

TAO-AFI, the Association of independent officials of the European Commission, has been analysing the work situation of colleagues at DGT for quite some time now.

Many colleagues have contacted us in search of assistance. The work carried out by our colleagues in this essential task at our institution is undergoing a number of increasing difficulties that could seriously compromise if not tackled conveniently the overall very high quality work delivered by our colleagues. We have taken time to reflect on this, based on direct experiences on daily work. We submit the following analysis and proposals to you hoping they can be taken into account to ease our colleagues' work encompassing both efficiency and professionalism on one hand with proper work conditions for our already very engaged colleagues on the other.

As you know, by providing high-quality translation and other language services, the DGT is a

full partner in the legislative process and plays a central role in multilingual law making as it delivers equally authentic language versions of the legislation proposed and adopted by the Commission. It is important that all language versions convey the same meaning, so that texts can be interpreted and applied uniformly and produce the same legal effect in the different Member States (the so-called multilingual concordance).

However at present a number of **factors** risk compromising the quality, the legal certainty and the multilingual concordance.

(I) RISK FACTORS TO TACKLE TO ENSURE A PROPER QUALITY OUTCOME:

I.1) The high level of outsourcing.-

There is a **strategic plan for DGT Translation for the period 2016-2020** which foresees the decrease of internal staff and the parallel progressive increase of outsourcing, that is to say having documents translated by external freelancers (see below chart).

Specific objective 2: DGT makes efficient use of its human and financial resources and manages fluctuating demand by increasing the level of outsourcing		
Result indicator:		
1. Outsourcing rate		
Proportion of pages translated externally as a percentage of the total number of translated pages delivered by DGT		
<i>Source: DGT- management information scoreboard</i>		
Baseline 2015	Interim milestone	Target 2020
	2018	
27 %	33 %	37 %

As it can be seen from the above chart, there is a specific objective aiming at progressively and rapidly increasing the proportion of pages translated externally as a percentage of the total number of translated pages delivered by DGT, moving from 27% in 2015 to 37% in 2020, i.e. a 10% increase in just 5 years.

This plan of course has the only objective of reducing translation costs, at the expense of quality and privacy. We believe this is a myopic strategy which takes into account only short-

term results in terms solely of cost reduction.

Outsourcing above a certain level should not be allowed. It should be kept at a level not exceeding 30% for the following reasons:

i) **An outsourcing level of 37-40% implies that also legislative acts and sensitive documents are sent out for translation, thus compromising privacy and coherence among language versions (multilingual concordance).** In fact, only internal translators have the possibility to communicate with translators of other units and check the solutions they have used in case of doubts about the interpretation of the original documents. Freelancers cannot avail themselves of this possibility. In addition, only internal translators have the possibility to access the whole set of reference documents, databases and communication and cooperation tools of the DGT. Freelancers of course are only sent a limited number of memories or reference documents to consult and do not have access to internal communication and cooperation tools;

ii) **External contractors are selected through tendering processes which don't allow differentiating them based on their thematic expertise. This can also affect the final outcome quality; at present, internal resources have often to rewrite badly translated documents.** This means that instead of being a help and a means to reduce translation time and costs, outsourcing is becoming a problem and an additional burden for internal staff;

iii) **The plan foresees for some outsourced documents only a partial or spot-check revision,** which of course implies risks in terms of quality;

iv) **The fact of reducing internal resources and of increasing the share of outsourcing means that internal staff will end up passing most of their time in preparing reference documents for freelancers, revising documents translated outside and carrying out just quality controls, thus losing part of their translation ability;** in order to be and remain a good translator and reviser you also need to actually translate documents instead of just revising.

1.2) Another factor that risks compromising quality is the excessive workload for internal translators and the very high level of productivity they have to ensure.-

Due to the constantly heavy workload, DGT personnel end up translating a very high volume of pages each day. Translators should also have more time to do researches, to find

documents online on the subject matter they are translating, to achieve a good coordination with colleagues when translating similar documents or documents being part of a package, to communicate efficiently with national experts, or to transmit their knowledge and expertise to newcomers.

I.3) By reducing internal staff we happen to be losing thematic expertise to a worrying extent.-

Translators should be specialised in specific fields (for example, financial sector, energy, telecommunications, agriculture, etc.) and should have the time to maintain their thematic expertise. If one just focuses on productivity and reducing staff, everybody will be bound to translate everything and the units will soon lose their precious thematic expertise, which is essential also to efficiently revise freelancers, spot errors and inappropriate terminology in their texts and provide them with useful feedback.

The above-mentioned factors would therefore entail among other implications the following **negative consequences**, some of which were already described above:

- loss of legal certainty and coherence between language versions for legislative acts, with the risk of non-uniform implementation by Member States;
- lost thematic expertise;
- compromising the privacy of documents;
- compromising the quality of translated documents;
- bad communications with citizens and Member States.

(II) ALTERNATIVE SOLUTIONS TO INCREASE PRODUCTIVITY AND IMPROVE QUALITY WHILE REDUCING SOME COSTS

TAO-AFI proposes the following changes in view of attaining the above-mentioned goals:

- 1) Improve the process upstream, limiting as much as possible the occurrence of**

multiple successive versions of documents (this is foreseen also in the above-mentioned strategic plan for DGT). Before sending documents out for translation, the different DGs should ensure the quality of the original document and send only a stable version. This could be done by improving drafting and by strengthening the editing service.

2) Whenever possible, reduce the number of pages of documents drafted by different DGs by following the *Clear Writing Guidelines*, in order to reduce as a consequence also the volume of pages to translate. **The quality of EU legislation should also be improved by making sure texts are concise and clear** (this is foreseen also in the above-mentioned strategic plan for DGT). The impact of the clear writing campaign should be increased also working with other services to help staff draft more clearly at source.

3) Improve communication with the requesting DGs.

4) Create different freelancer databases based on thematic expertise instead of having a single generalist database.

5) Create the conditions to allow the thematic specialization of internal translators. Specialized translators are much more productive because they are more confident, they understand concepts without difficulty, they know the appropriate terminology to use and they are able to ensure a better quality. In addition, this would allow also having more time to better train newcomers and to transfer them precious and sector-specific knowledge.

6) Improve the way in-house translators are selected in order to ensure that only the most suitable candidates and motivated people are selected. Competitions for linguists should be considered similar to specialist competitions (see for instance the recent competition for Audit) and therefore **a Talent Screener (selection based on qualification and experience) should be introduced as well for linguists.** This would allow to open the competition to all interested people (in order to avoid limits which could prevent finding suitable candidates in small countries for example) but at the same time it would allow to add points to the CBT score for those candidates who have specific qualifications and requisites, such as proven experience in translation of at least a minimum number of years. This would allow to obtain the best talents and also to find people who could become highly productive and efficient in a short period of time.

We are confident that your service will be sensitive to these proposals we put forward,

which are the result of the information provided by colleagues working at DGT, and do remain at your disposal to help making this possible

Yours sincerely,



Executive committee

Join TAO-AFI to reinforce the staff's action and to be informed on your rights!!!

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