

Guidelines and template for EU Agencies' multilingual policies

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1. INTRODUCTION

Respect for cultural and linguistic diversity has always been fundamental to European integration. **Multilingualism** is thus a **founding principle** of the EU. It is anchored in the very first legislative act adopted by the European Economic Community: Article 1 of <u>Regulation No 1 of 1958</u>, as subsequently amended.

As part of the family of EU institutions and bodies, EU Agencies and Joint Undertakings ('EU Agencies') work across a **wide range of areas** that influence the lives of almost 450 million citizens in the EU. It is therefore essential that EU Agencies **make** their **information available in different languages** so that all stakeholders and EU citizens understand the crucial work they do for them. Having access to information in a known language enables stakeholders and citizens to take part in the EU's democratic process. In addition, multilingual communication contributes to the Agencies' image and reputation across the EU and even beyond.

While EU Agencies are **committed to multilingual communication**, they face a number of **challenges** when it comes to implementing language strategies. These include limited human resources to manage translation processes, tight translation budgets, time constraints (producing translations adds time to the overall production schedule for communication outputs), or the fact that some agencies have established dedicated workflows with national authorities or other experts to review translated output prior to publication, which may be cumbersome to manage.

In recent years, advances in language technologies have opened up new opportunities for implementing multilingualism in a timely and cost-efficient manner. The Translation Centre for the Bodies of the European Union (CdT), as the shared language service provider for the EU Agencies, has fully embraced these technologies to offer solutions for their various multilingual communication needs. Furthermore, the CdT's 'quality for purpose' approach provides its clients with a range of possibilities to optimise their translation budgets.

This document is the result of the working group on multilingualism¹¹ established by the EU Agencies' Heads of Communication and Information Network (HCIN) under the chairmanship of Fusion for Energy Joint Undertaking (F4E). It is intended to act as a guide for those agencies that wish to develop or review their multilingual strategy, policy or practice and need advice or inspiration.

2. GENERAL GUIDELINES

When developing a multilingual strategy, policy or practice, Agencies should take a few general considerations into account:

A) LEGAL FRAMEWORK

In addition to <u>Regulation No 1 of 1958</u>, the importance of safeguarding linguistic diversity is emphasised in **other primary legislation**, under which 'every person may write to the institutions of the Union in one of the languages of the Treaties and must have an answer in that same language'¹.

It is essential to check what the **founding regulation** of each Agency says about multilingual communication and translation. The founding regulation usually specifies what kind of material the Agency is expected to produce and for whom. The founding regulation may also include a mandatory clause to use the CdT's services.

Certain types of documents requiring publication in the EU's Official Journal² need to be made available in the 24 official EU languages, such as budgets³, vacancy notices⁴ or replies to ECA audit observations⁵.

Specific rules apply to cases brought before the **Court of Justice of the EU**: Agencies are required to present documents in the language of the case usually with a translation into French, if French is not the language of the case⁶.

The Agency may have **governing or management board decisions** in place specifying the Agency's language regime (the Agency may have agreed on specific working languages or may have issued a decision not to translate certain documents).

B) EUROPEAN OMBUDSMAN RECOMMENDATIONS

Following a public consultation, the **European Ombudsman** issued <u>recommendations</u> for <u>multilingual</u> <u>communication</u>, which EU Agencies are expected to implement.

¹ See Article 3(3) of the <u>Consolidated version of the Treaty on European Union</u>; Article 20(2d) and Article 24 of the Treaty on the Functioning of the European Union (<u>Consolidated version</u>); Article 21 and Article 41(4) of the <u>Charter of Fundamental Rights of the European Union</u>.

² See Article 1(1) of Council Regulation (EU) No 216/2013 of 7 March 2013 on the electronic publication of the Official Journal of the European Union.

³ See Article 37(2) of Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union.

⁴ See judgment in cases C-377/16 and C-621/16 P of the Court of Justice of the European Union.

⁵ See Article 287(1) and (4) of the <u>Treaty on the Functioning of the EU</u>; Article 28 of the <u>Rules of Procedure of the Court of Auditors of the European Union</u>; and Article 69 and Article 70 of the <u>Decision No 21-2021 laying down the rules for implementing the Rules of Procedure of the Court of Auditors.</u>

⁶ See Articles 36 to 41 of the Rules of Procedure of the Court of Justice of 25 September 2012 (OJ L 265, 29.9.2012), as amended on 18 June 2013 (OJ L 173, 26.6.2013, p. 65), on 19 July 2016 (OJ L 217, 12.8.2016, p. 69), on 9 April 2019 (OJ L 111, 25.4.2019, p. 73) and on 26 November 2019 (OJ L 316, 6.12.2019, p. 103).

The Ombudsman also issued a guide for the EU Administration on 'Policies and practices to give effect to the right of public access to documents'.

C) STAKEHOLDER ENGAGEMENT AND COMMUNICATION STRATEGY⁷

The multilingual strategy, policy or practice of each Agency should be placed in the wider context of its mission and overall stakeholder engagement and communication strategy.

In the framework of its stakeholder engagement and communication strategy, each Agency should ascertain the following:

- who are the key target audiences (such as Member State authorities, the host country, the EU institutions and/or presidency, companies, academia, social partners, health professionals, international organisations, NGOs or the general public);
- what are the languages of these audiences;
- what kind of multilingual material would be useful for them and in which format(s).

D) THE POTENTIAL OF MACHINE TRANSLATION⁸

A multilingual communication strategy, policy or practice should not only state what type of content and for whom it is translated, but it should also consider the **opportunities offered by machine translation**. Machine translation (MT), especially **Neural Machine Translation (NMT)**, has made a giant leap forward in recent years and has revolutionised the way in which translations can nowadays be produced. Thanks to advancements in artificial intelligence, computing power and data availability, language and translation technologies are now capable of yielding high-quality results in multiple domains.

To make the most of these technologies, Agencies may consider a combination of human translation and machine translation with or without human intervention (post-editing) depending on the expected quality and purpose as well as resources available.

It is worth bearing in mind that, for an optimal machine translation result, specific **recommendations for the drafting of originals** apply in addition to general clear writing principles.⁹

One should also be aware that using **machine translation without any proofreading/post-editing by a linguist** entails the risk of linguistic and translation mistakes, hence the risk of misleading information, which could damage the Agency's reputation and trustworthiness. In those cases, the intended audience should be informed, and an appropriate **disclaimer** should be added. For important content intended for a wide audience, the use of machine translation with post-editing or traditional human translation is highly recommended (see table below).

⁷ Please also refer to the EUAN Communication and Stakeholder Engagement Framework published on the EU Agencies extranet (https://euagencies.eu/index.php?q=filedepot_download/7070/8534).

⁸ Machine translation - language technology enabling texts of any length to be automatically translated from one language to another with short turnaround times and high accuracy. A service based on machine translation technology can provide general or in-domain translations for understanding the content of a document in a different language and for other uses. The advent of Neural Machine Translation (NMT) has prompted a radical shift in translation technology, resulting in higher-quality, more natural-sounding translations. NMT is an 'adaptive MT' solution which has the ability to continuously improve by learning on the fly from correction input.

⁹ For more information, see bullet 7 under 'Tips for Agencies' websites' below.

Benefits and limitations of machine translation (MT)

	Provider	Advantages	Disadvantages	Purpose
Human Translation (includes MT with full post-editing)	CdT	Available through the CdT Client Portal High-quality translation based on CdT translation memories and NMT engines; the Commission's translation tools, such as Euramis; and IATE (4-eyes principle: translation + revision involving two translators) All types of texts, including sensitive, confidential and classified, can be translated in line with the applicable security rules. Formatting work is included.	Price and turnaround time (which may vary depending on urgency and page count)	Translating any text having a wide audience and requiring the highest level of quality in terms of accuracy, style and formatting. For example: • marketing material • press releases • stable web content • confidential documents • legal documents (e.g., agreements, court cases)
MT (without human intervention) / automatic translation	EC eTranslation	 Available through the CdT Client Portal Combination of CdT neural machine translation engines and translation memories to ensure that terminology is adapted to Agencies' document types and fields of activity Very low price (a few cents/page) Short turnaround time Can translate several documents into several languages in one go Maintains the original formatting in the translated file in most cases, including inline formatting High security - all data processed by the system stay within the CdT's firewalls and cannot be seen by outsiders Readily available via the dedicated Commission platform Price (free of charge, until further notice) Short turnaround time Can translate several documents into several languages in one go Maintains the original formatting in the translated file in most cases, including inline formatting High security - all data processed by the system stay within the Commission's firewalls and cannot be seen by outsiders Can be embedded in *.europa.eu websites via a widget in cooperation with DIGIT 	The following points are valid for CdT and EC MT: As it is raw MT, the quality and terminology might be inconsistent, in particular for very short or nonstandard sentences. You can get the gist of the text, but leaving aside stylistic nuances which render language lively and appealing. The quality varies across different language combinations and domains. Occasionally, automatic translation is unable to convey the correct meaning (untranslatability or lack of equivalent in another language). The layout might need to be reworked or corrected. Texts marked as 'classified' cannot be processed using automatic translation.	Translating any text or document for which high quality is not a requirement or for giving an idea of the content ('gisting'), for example: • internal documents • working documents or temporary texts

	Provider	Advantages	Disadvantages	Purpose
	Private market tools	Readily available online Price (some of them offer MT for 'free') Short turnaround time Can translate several documents into several languages in one go Maintains the original formatting in the translated file	See above Data storage/lack of confidentiality depending on the package/subscription acquired Potential non-respect of GDPR/EUDPR No or very limited control over data usage by the provider Intellectual property rights/copyright issues ¹⁰ Free online machine translation tools cannot always adapt content to context.	
MT (with light post- editing) ¹¹	CdT	Available through the CdT Client Portal Higher quality than MT without human intervention: MT output and translation memory matches are corrected by CdT linguists to ensure that the translation is correct and understandable, that no important information has been left out or added and that the spelling is correct. Lower price than human translation Maintains the original formatting in the translated file in most cases, including inline formatting	Light post-editing does not include: stylistic corrections or restructuring of sentences unless the meaning of the text is affected; additional quality control by a second linguist; post-processing (the layout may need to be reworked or corrected). Texts marked as 'classified' cannot be processed using light postediting.	 This service is particularly suitable where the highest level of quality is not required. It is not recommended for marketing or other material for which style is essential.

Depending on the terms and conditions of the service used, the user will lose copyright ownership over the source and/or target document. This may lead to intellectual property right issues when publishing the MT-translated content.
 CdT offers light post-editing exclusively in combination with MT performed by the Centre.

3) SPECIFIC GUIDELINES

A) TIPS FOR AGENCIES' WEBSITES

Websites are the main tool used by EU Agencies to make multilingual content available to a wider audience¹².

Managing a multilingual website in 24+ languages is challenging. While it is true that maintenance and costs can be real issues, it is not beyond the reach of even small Agencies to run a multilingual website **successfully** by applying a few principles:

- When planning the Agency's multilingual website, it is important to choose a content management system (CMS) that allows easy handling of multilingual content.
- The use of a web translation module, such as the one proposed by the CdT for Drupal-based websites, facilitates the management of multilingual websites. An automated translation management tool and associated workflow helps to streamline the translation process and subsequent uploading in the different language versions.
- Agencies may consider a phased approach in shifting from a monolingual to a fully multilingual website based on web analytics and audience statistics.
- Agencies could also consider dividing their website into two sections: one for the general public (accessible in all languages), and one for expert audiences (who are used to working in English). The different sections of the website could offer more or fewer languages depending on the needs, or even only English.
- It is advisable to prioritise the translation of stable content which is unlikely to change (first levels of the website), while leaving volatile content, such as news items or content that might need frequent redrafting, in English or in a selected number of languages only. Exceptions may be made for highly sensitive or cross-cutting topics having a broad reach.
- Agencies may choose to translate into a wider selection of languages general single-entry points or summaries of publications (to provide an idea of what the topic is about), and general materials that could be of interest to wider audiences (strategic documents, brochures, practical guides, public consultation reports, news releases, procurement documents, vacancy notices). Agencies may also rely on their networks to assess or decide whether specific parts of the website need to be translated. Quick news items, sections for technical experts or specific content/publications may be left in English only.
- Clear drafting is essential to offer shorter texts which provide an unambiguous message and facilitate the subsequent translation process. Summarisation (the production of summaries of long documents for subsequent translation) can also be considered as a way to enhance multilingual communication within the approved budget. In addition, for high-quality translation, it is important to follow the Commission's principles on clear writing and the Interinstitutional

¹² Social media are a powerful communication channel, but they are outside the scope of these guidelines as posts need to be published quickly, while posting and interactions with followers in different languages can be difficult to manage. In addition, social media platforms are evolving continuously, and they may present translation challenges, such as hashtags.

<u>Style Guide</u> in general, as well as the CdT's tips on <u>writing for translation</u> and <u>writing for machine translation</u> in particular.

Developing multilingual glossaries of core terminology and making these available on the
websites of EU Agencies is key to ensuring coherent communication in specialised domains. The
CdT can help create glossaries and import them into IATE (the EU's terminology database) so
that the terms are accessible to institutional and public stakeholders.

B) POSSIBLE SCENARIOS FOR IMPLEMENTING MULTILINGUALISM ON AGENCIES' WEBSITES

The working group came up with three scenarios for implementing multilingualism on Agencies' websites depending on resources:

SCENARIO 1: Basic implementation of multilingualism

Preferably human translation of stable sections of the website (the skeleton of the website; the 'About us...' section; news items of key importance/interest to the public) and MT translation of other (more dynamic) content in a selected number of languages based on customer needs/user statistics/web traffic.

SCENARIO 2: Medium implementation of multilingualism

Translation of the entire website into selected EU languages or translation of selected content in all EU official languages, using a mixture of human and MT for the translation of content as outlined under scenario 1.

SCENARIO 3: Full implementation of multilingualism

Translation of the entire website in all EU official languages using a mixture of human and MT for the translation of content as outlined under scenario 1.

Valid for all three scenarios:

For non-EU languages, consideration should be given to the Agency's specific mandate (asylum, migration, environment, safety and health, training, etc.) and primary target audiences, which might be outside the EU.

Regardless of which scenario is used, the Agency should describe its multilingual approach in a strategy, policy or practice and make it available on its website. See policy template in the Annex.

ANNEX: MULTILINGUAL POLICY TEMPLATE

(to be adapted by EU Agencies according to their individual needs)

INTRODUCTORY STATEMENTS

Explain why multilingualism matters for the functioning of your Agency. Stress that your Agency subscribes to the language policy of the European Union¹³, especially the right of EU citizens to receive appropriate information in their language in order to have trust in the EU administration. You may also add that you translate content to comply with the need for financial transparency and accountability.

Say that your Agency wishes to reach out to its target audience (details on the target audience can be listed), and to maintain its reputation as a reliable expert organisation in its field.

Add a sentence about finding the right balance between implementing multilingualism and complying with your Agency's budget (cost efficiency).

You may also include in this section specific language arrangements taken by your Agency's management or governing board, or a statement on your Agency's working language(s) for operational purposes.

MAIN PART

Set out which materials your Agency has chosen to translate and into which languages. This may be done by means of plain text, by type of document or deliverable, or in the form of a table (see **example** below):

Documents

Target audience (For whom?)	Objective (Why?/What does the agency want to achieve?)	Content type (What does the agency want to do/communicate?)	Languages (How many?/ Which ones?)	Channel/Tool (How and where is the content made available?)
Management Board; Budgetary Authority	Information and approval; accountability and transparency	Annual Activity Report/Work Programme/Budget	All EU languages for mandatory publications in the OJ OR XX languages (according to MB decision)	Illustrated paper copy Online publication on website
Agency stakeholders (e.g. national authorities)	Information	Reports; Guidelines; Briefing notes; Opinions; Recommendations; Promotional material (e.g. leaflets, brochures, infographics, flyers, posters, etc.)	All EU languages or depending on topic	Website / Campaign pages Illustrated paper copy

¹³ Treaty on European Union; Treaty on the Functioning of the European Union; Charter of Fundamental Rights of the European Union; Regulation No 1 of 1958, as subsequently amended; ECGAB.

Target audience (For whom?)	Objective (Why?/What does the agency want to achieve?)	Content type (What does the agency want to do/communicate?)	Languages (How many?/ Which ones?)	Channel/Tool (How and where is the content made available?)
General public	Information and marketing	Public consultations Promotional material (leaflets, brochures, videos, infographics, flyers, posters, etc.)	All EU languages in the case of a general publication, or depending on the purpose and target audience	Website / Campaign pages Videos: YouTube + other social media channels Illustrated paper copy
Media	Information on a particular topic/ achievement/ issue	News release, featured articles, plain language summaries	EN only OR XX languages	Website Press conference News channels

Website

With regard to the Agency's website, you should detail what exactly is translated: for example, the browsing levels (first, second and so on), search and navigation functions, menu items or specific sections.

You may refer to the table above for documents that you translate and publish on your website.

Social media

Describe which language(s) you use for your social media channels. It may be important to include information on the languages used for interactions with followers.

CLOSING STATEMENT

This may say that you will review and update the policy regularly in line with changes to your Agency's overall strategy and budget.

This may also include a statement on how you will monitor your policy/measure the performance of your policy in view of future updates.