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on Special Report No 9/2006 of the European Court of Auditors concerning translation expenditure incurred by the Commission, the Parliament and the Council

Committee on Budgetary Control

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Introduction

On 13 September 2006 the European Court of Auditors (ECA) presented its Special Report No 9/2006 concerning translation expenditure incurred by the Commission, the Parliament and the Council to the Committee on Budgetary Control (CONT).

Twenty-one languages have the status of official and working languages of the European institutions. Each EU institution has its own translation service. The institutions which, on account of their activities, have to provide the largest volume of translations are the Commission, Parliament and the Council (approximately 70%).

For practical reasons the institutions mainly work in a limited number of languages, but documentation received from, and sent to, Member States is in their official languages. The translation of incoming and outgoing documents is therefore vital to the sound running of the institutions and for communicating with Member States and their citizens.

Respect for multilingualism

Multilingualism¹ is one of the key features of the European Union, which highlights cultural and linguistic diversity and ensures equal treatment of EU citizens. It guarantees citizens' right to communicate with the EU institutions in any of its official languages, thus enabling them to exercise their right of democratic control. At the same time the linguistic services contribute to the EU institutions remaining open and transparent to the citizens of Europe.

In Parliament the use of official languages is governed by its 'Code of Conduct on Multilingualism', updated in 2004; its Rules of Procedure stipulate that Members may speak in the official language of their choice and that interpretation into the other languages is provided.

The total cost of all the linguistic services of the EU institutions, translation and interpretation combined, represent approximately 1 % of the total EU budget.

While multilingualism is an expression of the EU's cultural diversity, the increasing number of official languages calls for pragmatic solutions in the preparatory work within the institutions.

Objective of the audit

The objective of the audit was to assess the extent to which the Commission, Parliament and the Council manage their translation resources and expenditure efficiently and effectively. The Court addressed three questions:

- Is translation demand met and are there adequate procedures to avoid unnecessary translations?

¹ The principle of multilingualism is laid down in Articles 21, 290 and 314 of the EU Treaty.

- Are translations timely and of adequate quality for their purpose?
- Were the institutions able to keep the cost of translations under control?

The audit principally covered 2003 and 2004, but changes which occurred in 2005 as a consequence of enlargement were also taken into consideration.

Management of translation demand

Clear guidelines would be necessary to establish criteria for translation requests. However, according to the Court, none of the institutions has established consistent and clear procedures defining who can request a translation, which types of documents should be translated (when and into which languages), criteria for authorising non-mandatory translations and procedures for monitoring the enforcement of "translation policy".

Requests for translations concerning the EU-15 languages were generally met by the institutions, whereas the situation was different for the 10 new enlargement languages (EU-10) due to an insufficient number of translators from the new Member States.

None of the institutions was able to meet its targets for recruitment of staff translators and support staff for the new language units.

In recent years the institutions have managed to limit the increase in translation volume by means of the following measures:

- establishing a list of "core documents",
- limiting the maximum length of texts,
- offering executive summaries in different languages rather than complete translation,
- concentrating on translating the final version of documents,
- encouraging users to exercise restraint.

Quality control

The quality of translations into the EU-15 languages was generally considered to be good. However, the Court noticed quality problems for translations into the EU-10 languages.

About 90% of translations were finished within the agreed deadlines.

At the Commission, the Directorate General for Translation (DGT) divides all translations into five categories of "translation quality types" (TQT), with a different degree of revision and/or quality evaluation according to the type of document. In addition, some Commission DGs, such as DG Competition, systematically review the translations they receive.

Parliament and the Council do not allocate translations to quality categories and their quality control procedures are therefore less structured. As a result, revision practices

vary significantly, although legislative acts are always revised by lawyer-linguists before publication.

In addition, the Parliament uses bimonthly random checks to verify spelling and grammar.

None of the institutions' translation services has put in place specific tools to measure users' satisfaction or formulated procedures for handling complaints about quality.

Cost and efficiency of translations

In the past the institutions have calculated neither their total translation costs nor their costs per page.

For 2003 the Court estimated the full cost of translations¹ at EUR 414.2 million: EUR 214.8 million at the Commission, EUR 99 million at Parliament, and EUR 100.4 million at the Council.

The average cost per page was EUR 166.37: EUR 150.2 at the Commission, EUR 149.7 at Parliament, and EUR 251.8 at the Council.

External translations were approximately 30% cheaper than in-house translations.

In general, the institutions did not produce sufficient indicators and management information to monitor the translation process.

Given the character of their (political) work, reliable forecasts of demand are difficult to estimate at Parliament and the Council.

It seems to be common practice that translators decide on the use of IT tools (computer-assisted translation), research tools and voice recognition software themselves.

Productivity, defined as the number of standard pages translated internally per internal translator ("full time equivalent" = FTE), fluctuates widely from one language division to another and from one institution to another.

The productivity of the EU translation services is considered lower than in the private sector².

The productivity of the Commission DGT (approximately five pages a day) was slightly lower than Parliament's translation service. The lower productivity can to

¹ Full cost means, according to the Court, costs for translators, secretaries, management, service staff, planning, building, IT, and human resource management (i.e. training).

² See also PriceWaterhouseCoopers, Comité Economique et Social (CES) & Comité des Régions (CdR), "Analyse comparative de la productivité des départements de traduction des institutions européennes", Bruxelles, 4 août 2000, p. 24: "Il est à noter que la productivité d'un traducteur d'un établissement privé tourne aux environs de 8 à 10 pages par jour sans tenir compte de la production via "Translation Memory" (une page correspondant à 350 mots)" (350 words = 2 100 characters = 1.4 standard pages).

some extent be explained by the Commission's role as initiator of the legislative process. The Council's productivity was systematically lower than that of the Commission and Parliament due to a high share of legislative documents requiring particular attention and highly fluctuating demand.

The institutions did not have a comparable set of performance indicators which would allow monitoring of the translation process in the institutions in the same way.

Comments and recommendations of the Committee on Budgetary Control

The Committee on Budgetary Control:

Respect for multilingualism

1. Considers multilingualism to be one of the key features of the European Union, which highlights cultural and linguistic diversity and ensures equal treatment of EU citizens; it guarantees citizens' right to communicate with the EU institutions in any of its official languages, thus enabling them to exercise their right of democratic control; at the same time, the linguistic services help to keep the EU institutions open and transparent to the citizens of Europe;

Cost of translations

2. Underlines the fact that the total cost of all the linguistic services of the EU institutions - translation and interpretation combined - represents merely 1% of the total EU budget;
3. Is surprised that institutions have so far calculated neither their total translation costs¹ nor their costs per page; notes that, in 2005, the volume of translations was 1 324 000 pages at the Commission (1 450 translators), 1 080 000 pages at Parliament (550 translators) and 475 000 pages at the Council (660 translators); notes furthermore that the ECA estimated the full cost of translation, in 2003, at EUR 414.2 million: EUR 214.8 million for the Commission, EUR 99 million for Parliament and EUR 100.4 million for the Council; for the same year the average cost per page stood at EUR 166.37: EUR 150.2 for the Commission, EUR 149.7 for Parliament, and EUR 251.8 for the Council;
4. Calls on the institutions to take the appropriate measures to further improve the productivity of the EU translation services by comparison with the private sector;
5. Asks Parliament to clarify why the prices it pays for freelance translators are on average 12% higher than the prices paid by the Commission;

¹ According to the Court these figures cover costs for translators, secretaries, management, service staff, planning, building, IT, and human resource management (i.e. training).

6. Welcomes the fact that the Commission and the Council have managed to limit the increase in translation volume after the EU-10 enlargement, thereby curbing the cost increase;
7. Calls on the three institutions to establish translation costs on an annual basis using the same criteria and calculation methods; the figures obtained should be used not only for budgetary purposes, but also to raise cost awareness among users;

Quality of translations

8. Welcomes the fact that the quality and timeliness of translations into the EU-15 languages, according to a client satisfaction survey carried out by the Court, is considered generally satisfactory, although some problems persist with technical and legal terms;
9. Is, however, concerned about the considerably lower quality of the EU-10 translations, mainly caused by a lack of qualified translators;
10. Notes the readiness of the Commission to address the problem, as outlined in its replies to the Court;
11. Calls on the Commission to organise a critical review of EPSO's failure to recruit the staff needed from the EU-10 countries;
12. Is generally of the opinion that the institutions must take the necessary measures to guarantee a high translation quality standard; calls therefore on the Council, Parliament and the Commission to report back to the Court and the Committee of Budgetary Control on measures taken to monitor and improve the quality of translations in time for the 2006 discharge procedure;

Procedures for managing translation demand

13. Welcomes the fact that, in general, translation requests for the EU-15 languages were met by the institutions; however, the institutions have had difficulty finding a sufficient number of qualified translators for the EU-10 languages over the last few years; notes that the institutions, with the help of the Member States, have started to tackle the problem;
14. Notes that the Court criticized ambiguous procedures for requesting translations, and also unclear guidelines with regard to which documents must be translated and which need not be;
15. In this context, welcomes the Commission's readiness to address the authorisation procedure and the screening of translation requests in 2006; also welcomes the fact that, in 2003, the Council established a list of core documents, thereby limiting the translation of other texts;

16. Recommends that greater use be made of limits on the length of documents and written summaries;
17. Asks, with regard to Articles 8 and 9 of the Code of Conduct on Multilingualism of 19 April 2004, whether Parliament could make greater use of "procedural languages"; asks the Secretary-General to report back to the Committee on Budgetary Control during the 2006 discharge procedure;
18. Encourages parliamentary committees and delegations to provide texts only in the languages of committee members and their substitutes; additional language versions could be provided upon specific request;

Efficiency of the translation process

19. Calls on the institutions to improve further the information available to management for monitoring the translation process, taking into consideration the performance indicators proposed by the Court¹;
20. Calls on the Council, Parliament and the Commission to make efficient and effective use of internal and external resources such as databases, computer-assisted translations, teleworking and outsourcing;
21. Welcomes the improving interinstitutional cooperation among the EU translation services, in particular as regards the creation of a common terminology database, joint tenders, and evaluating outsourced translations;
22. Welcomes also the joint task force on 'workload balancing', which should lead in time to more effective use of any spare translation capacities in the institutions;
23. Calls on the institutions to verify spare translation capacities in the other two institutions before outsourcing translations.

¹ See paragraphs 53 and 88 of the Court's report.