Euro-murkiness: Plain language and "fighting the fog" in European Union translation

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Abstract
This memoir examines the basis and development of the Plain Language Movement (PLM), the official relationship between plain language and the European Union, and the application of plain-language guidelines to EU translation with a particular focus on translation from French into English. It uses various aspects of translation theory, including Skopos theory, deverbalization, and intralinguistic translation, to explore reasons that EU translations are still notoriously murky and unclear and to make recommendations for applying PLM guidelines to future EU translations. It concludes with a case study comparing standard and plain-language French>English translations of an EU text.


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EURO-MURKINESS: PLAIN LANGUAGE AND “FIGHTING THE FOG” IN EUROPEAN UNION

TRANSLATIONS

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I. Introduction

Everyone has had the experience of wading through official documents that purport to be written in English but are all but unreadable to anyone but an expert in the field. From cell-phone contracts to government press releases to academic journals to instruction manuals, “formal writing” in English has become almost synonymous with jargon and complexity, and the onus has traditionally been on the readers to make sense of it rather than on the writers to avoid it.

Over the last several decades, however, readers and writers alike have begun to join forces against this march toward writing that befuddles rather than informs. The plain language movement, which began as little more than a smattering of style guides and pamphlets across North America, has grown into a powerful force in law, government, and academia. Proponents of plain language challenge the idea that straightforward, comprehensible texts are somehow less respectable (or even less feasible) than the dense, jargon-laden, poorly-constructed documents that readers have come to expect from official institutions and government bodies. But while plain-language ideology has become mainstream, putting it into practice remains a challenge.

Background

The plain language movement (also known as the “plain English movement” or “plain English campaign”) is a loosely-organized network of individuals and institutions calling for official documents to reflect “the interests and needs of the reader and consumer rather than the legal, bureaucratic, or technological interests of the writer or of the organization that the writer represents.”¹ More tangibly, plain language holds that written information should be set out “in a way that gives a co-operative, motivated person a good chance of understanding the

¹ Steinberg, 1991: 7.
document at first reading, and in the same sense that the writer meant it to be understood”. 2

The movement began in the 1950s in the U.S. and gradually gathered momentum; by the 1980s it had made its way abroad to Canada, the U.K., and Australia. Government agencies were among the first to acknowledge the need to produce plainer and more straightforward texts and move toward meeting that need, but the movement has since grown to include the legal, academic, and business spheres, among others. 3

Because the impetus for plain language has been provided by a wide variety of unofficial sources, it is admittedly somewhat disingenuous to speak about the “Plain Language Movement” (PLM) as if it were one unified body. The (small-“m”) movement toward plain language started at the grassroots level, and there are currently numerous organizations, associations, private companies, and government agencies dedicated to the promotion of plain language and clear writing, including the ‘Plain Language Association International’ and the ‘Plain Language Action and Information Network’ – the two of which, ironically enough, use the same acronym: “PLAIN”. None of them can claim definitive credit for the founding, direction, or success of the movement.

To give an example of what plain-language recommendations address, I have included (appendix 1) a sample guide to plain-language principles from Professor Joe Kimble, the department chair of Research and Writing at the Thomas M. Cooley Law School in Lansing, Michigan, and a driving force behind the Plain Language Movement in the United States. While Kimble’s principles generally reflect the majority of plain-language recommendations, no hard-and-fast rules for plain language exist – individual style guides, articles, and “how-to”s on plain language number in the dozens.

This extremely wide range of sources is part of the reason I have chosen to focus specifically on

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applying plain language translation within the European Union. The E.U. not only offers a vast
corpus of texts (both original and translated) published by an institution that has formally
endorsed the basic principles of plain language, but it has also set forth its own specific
recommendations for drafting and translating comprehensible texts, and with more than 2500
permanent staff translators, countless freelance contractors, and 23 translation languages, the
European Commission alone operates one of the largest translation services in the world: the
E.U. Directorate-General for Translation (DGT).  

**Existing Research**

Plain language, in and of itself, is not a completely new concept in the field of translation. The
E.U.’s plain-language movement, called “Fight the Fog,” was in fact created under the
leadership of DGT director and working translator Emma Wagner. However, the Fight the Fog
campaign, as well as the E.U.’s more recent Clear Writing Campaign, speaks about plain-
language translation and plain-language drafting as if they were the same thing, without regard
for the unique challenges of producing a plain target text when freedom of content and
structure is fundamentally limited, as with translation. In fact, a translator’s ability to produce
clear and direct target texts is constrained by logistical, linguistic, and political factors that do
not affect someone drafting an original text, and little or no research attention has been paid to
plain language as it relates specifically to translation.

Similarly, although the theoretical basis for plain-language translation can be tied directly to
several well-known translation theories including Skopos theory and text types (Katharina
Reiss), expectancy norms (Andrew Chesterman), and deverbalization and meaning transfer
(Marianne Lederer and Eugene Nida), no one has yet examined how these or other theories can
affect or inform a plain-language translator’s translation choices. In short, the plain language
movement in general and the Fight the Fog campaign specifically have gone little beyond laying

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4 “Translating for Europe”

down a list of general principles for clear writing in English and leaving it to the individual translator to determine which principles are relevant to translation and how to apply them.

**Research Questions and Approach**

This paper aims to address the abovementioned gaps in existing research – constraints and theoretical considerations in plain-language translation – against the backdrop of translation within the European Union. Specifically, it looks at three key questions:

1) **Overview:** How is the plain language movement relevant to translation in general and specifically to E.U. translation?

2) **Theory:** How can translation theory help address or explain the specific challenges of translating into plain language? What are the key factors that render existing E.U. translations “un-plain”?

3) **Application:** How do plain-language recommendations and/or potential shortfalls play out in a real-life translation?

This paper is not intended as a defense of plain language in the E.U., and the fundamental goal is not to prove the need for plain language in the supranational community. Although I will look briefly at the rationale behind the E.U.’s Fight the Fog campaign and its potential importance and implications, I will begin primarily from the fact of plain language in the E.U.: that the mandate exists, but practice is still clearly lagging behind.

**Scope**

This paper will not attempt to suggest institution-wide changes or to explore how the E.U. could reform its translation framework to make it more conducive to plain language. In truth, an enormous part of the “un-plain language” problem is attributable to factors that are not directly related to linguistic aspects of translation: the massive volume of documents that must
be translated within a short period of time, sloppily-written or jargonized source texts, translators working into rather than out of their B, C, or D languages, and so on. All of these issues are relevant to plain-language translation, but the scope of this paper is limited to examining problems and solutions at the level of the individual translator within the existing institution-wide constraints.
II. Plain Language and the E.U.

Plain language advocates over the last five decades have left few stones unturned in their quest to stamp out unnecessarily complex language, and the movement has swelled far beyond its original roots. In the years since its inception it has spawned numerous non-profit organizations, government agencies, international conferences, private consulting firms, and even a journal on legal drafting in plain language. Proponents also now include the U.S. and British federal governments; plain language’s most recent major boost came in 2010 when U.S. President Barack Obama signed into law the “Plain Writing Act of 2010 (H.R. 946)” requiring U.S. government documents issued to the public to be written clearly.6

However, H.R. 946 is not the first or only legislation aimed at promoting plain language. E.U. Regulation 1049/2001 made all E.U. documents accessible to the general public by default, exempting only documents that would pose a security risk if released. The regulation sets openness and citizen participation as E.U. priorities and calls for "wider access" to information as part of the E.U.’s ongoing push for transparency.7 The question of access to information, however, goes beyond merely providing photocopies upon request. As Leonard Orban, European commissioner for multiculturalism, said in a 2009 speech, "It is one thing to be given access to documents produced by the European Commission - it is quite another to fully understand them. To achieve this, we have to adopt a consistent citizen-friendly, customer-oriented approach."8

This attitude toward freedom of access in the E.U. is not new. One of the mechanisms for making the institution’s English-language documents more “citizen-friendly” is Fight the Fog, a plain-language campaign launched by the DGT in 1997 in an effort to combat the drift toward “euro-English” and bureaucratese that was already becoming an epidemic at that point.9 Plain

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6 "H.R. 946[111th]: Plain Writing Act of 2010."
7 "Regulation (EC) no.", 2001.
8 Orban, 2009.
language re-appeared on the radar in 2009 when the European Commission announced that it was expanding the effort with the introduction of the Clear Writing Campaign, which addresses the problem of murky and bureaucratic writing in all of the E.U.’s official languages. This new campaign, set to launch in phases throughout 2010 and 2011, includes the publication of E.U. style guides in all 23 official languages as well as a “hotline” for questions on writing clearly for the E.U.\textsuperscript{10}

Plain Language Guidelines

Although Kimble’s plain-language recommendations cover five main areas (general, design, organization, sentences, and words\textsuperscript{11}), not every principle is applicable to plain language translation, and particularly not to institutional translation. For example, E.U. translators have little or no control over document layout. The E.U. guidelines for translation contractors state that "Unless otherwise indicated in the information sheet, all assignments must be delivered in the same format as the original."\textsuperscript{12} At minimum, contractors are required to use the "Typeover" technique to ensure uniform font size, text formatting, and paragraph breaks. Alternatively, they may be required to use Eurolook or legisWrite, software which automatically formats the document to a pre-defined template to ensure either moderate (Eurolook) or total (legisWrite) uniformity of E.U. documents and legislation.\textsuperscript{13}

The result is that almost nothing under Kimble’s "general," "design," and "organization" headings applies to translation in the E.U. A savvy translator in the private sector may well be able to convince a client to allow cosmetic changes such as additional white space or more headings in the interest of making the target text more effective, but this is not an option in a translation department that frequently requires parallel translations across 23 languages in a relatively short period of time. This reduces the scope for plain language translation to the

\begin{thebibliography}{10}
\bibitem{10} "EU officials offered hotline for ‘clear writing’"
\bibitem{11} Kimble, 1994-95.
\bibitem{12} European Commission, 2008.
\bibitem{13} Ibid.
\end{thebibliography}
sentence and word levels and means that plain-language translators must rely more on the "text-based" approach that plain-language activists have tried to distance themselves from in recent years.\footnote{Kimble, 2003.}

The mainstream plain language movement has historically focused on two areas: plain-language ideology and plain-language application. “Ideology” in this case refers to where, when, why, and by whom plain language should be used, while “application” addresses the question of how (the “text-based approach” mentioned above). More recently, plain-language advocates like Kimble have begun to focus primarily on the ideology, stressing that plain language is essentially a way of \textit{thinking} about language and writing rather than a syntactical cookie cutter.\footnote{Ibid.} This is in contrast to its relevance within the E.U., where the ideological questions have already been settled – by the mandate that plain language should be used wherever, whenever, and by whomever possible – and what remains is simply the application.

\textit{Plain Language Guidelines for E.U. Translations}

My original intention was to evaluate E.U. translations in light of the general plain language movement, but because of the gap between PLM ideology and E.U. reality, I have decided to use the E.U.’s own "How to Write Clearly" style guide as the practical starting point of my plain-language translations and critique. Since the style guidelines align very closely with Kimble's "sentence" and "word" principles, these guidelines can therefore still be said to represent the PLM proper, if only in part. And since this style guide was produced specifically for the E.U. by the Fight the Fog campaign, it provides a basis to argue for the application of the guidelines even when they seem to conflict with current norms and trends for E.U. publications.
"How to Write Clearly" style guidelines:16

1. Put the reader first.
2. Use verbs, not nouns.
3. Be concrete, not abstract.
4. Use active verbs, not passive.
5. Name the agent.
6. Make sense and manage stress within sentences.
8. Avoid wordiness and multiple negatives.
10. Avoid Eurojargon and excessive abbreviations.

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III. Plain Language Translation in Theory

The first point to note is that “plain” translations, in practice, often look suspiciously like “good” translations. In other words, translating into plain language does not always call for a radical shift in style or register. As with plain-language writing, the goal of plain-language translation is to produce a text that is grammatical, stylistically appropriate, tailored to the target audience, no more complex than necessary, and acceptable under the conventions of the target language. The plain-language “rules” are essentially a way of quantifying these goals as they pertain to English. Consequently, except in very specialized (e.g. legal) translation domains, it can often be quite difficult to find fault with plain-language translations from either a theoretical or a practical point of view.

Why, then, is this area worth examining at all? Plain-language translation deserves specific consideration because even the briefest glance at the E.U. document archives – or the archives of any other international organization – reveals that the decades-long push for plain language (or, in E.U. parlance, “clear writing”) has had little or no effect to date on actual translation practice. English translations remain as unwieldy, ungrammatical, and sometimes downright nonsensical as they have ever been. If “plain” translations are synonymous with “better” translations, as is often the case in practice, and if there is no theoretical reason not to translate into plain language, then the clear-writing campaign must be failing for reasons other than theory-based resistance.

The obvious answer – i.e., that the translators in question are simply subpar – could be true in some individual cases, but it is implausible as a total explanation considering the highly competitive nature of the field and the rigorous recruitment and exam process that all translation applicants must undergo. Only 28% of E.U. translations in 2010 were outsourced to freelancers, which means that the remaining 72% were carried out by staff translators who had successfully completed the 10-month application process (including a battery of general

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17 “Tendering for Contracts”
exams in all of their working languages as well as oral, translation, and E.U.-knowledge exams) and were selected “based on [their] academic backgrounds, languages offered, and specialist knowledge.” Furthermore, all translations at this level are either approved by a reviser before publication or are produced by a translator who has qualified as “self-revising.” Thus it follows that the clear-writing effort’s failure to reform E.U. translations cannot be traced back to simple incompetence.

Through my research, I have identified three main reasons that murky translations continue to prevail over clear ones, namely that plain translation:

A) goes against the grain of parallelism and equivalence;
B) bucks the trend toward specialized language and jargon; and
C) is more time- and energy-intensive than traditional translation.

In the pages that follow, I will evaluate these proposed explanations in light of various translation theories, situational constraints, and “before and after” versions of E.U. texts translated from French into English.

A. Against the Grain: Parallelism and Equivalence

On the surface, the need for parallelism (frequently mistaken for "equivalence") may seem like the proverbial nail in the plain-translation coffin. Source and target texts should be readily comparable, should they not? Can a radically changed target text truly be considered a translation at all?

In fact, extremely parallel texts are more likely to be an accidental effect rather than a

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18 "Recruitment Competitions for the E.U. Institutions"
19 Johnstone, 2011
deliberate goal. For translators who are pressed for time or who do not truly understand the source text, line-by-line or even sight translation can become habits, and these approaches are the most likely to produce target texts that are extremely parallel (i.e. bearing a great deal of surface similarity) to the originals. However, parallelism is also something of an E.U. doctrine: the DGT provides contractors with an official translation checklist with detailed instructions on how to verify the surface equivalence of paragraphs, articles, sections, and page breaks before submitting translations.\(^\text{20}\)

For texts that need to be compared and discussed in a multilingual context, parallelism can be a valid priority; delegates using multiple language versions at the same time must obviously be on the same page (literally and metaphorically) in order to be able to discuss the text of the document. This is particularly true since many debates over documents are "meta-lingual," i.e. referring to the language itself.\(^\text{21}\) It is also extremely important for legally binding texts to hold up very closely in comparison to one another with no room for debate or interpretation, since all language versions of E.U. legislation and directives are equally binding once they have been approved.\(^\text{22}\)

The argument that E.U. translations should be perfectly parallel as a matter of course, however, is flawed in a number of ways. First, legislation and policy documents account for only one-third of the total volume translated annually by the DGT and are in fact the only type of European Commission documents that are routinely translated into all 23 official languages. The other two-thirds are comprised of reports, background papers, correspondence, websites, press releases, speeches, and meeting minutes,\(^\text{23}\) few or none of which will ever need to be compared on a line-by-line basis. Additionally, since these types of texts are generally intended to inform, sacrificing comprehensibility for the sake of preserving external similarity is not a

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\(^\text{21}\) Viaggio, 1996.
\(^\text{22}\) Pym, 1999.
\(^\text{23}\) “Translation and the European Union”
choice that can readily be justified.

Second, although the issue is not directly applicable to E.U. translation, it is highly questionable that legally binding translations between Western and non-Western languages (e.g., from French into Chinese) in other contexts and supranational bodies can live up to such neat surface parallelism as current DGT requirements demand from translations between Western languages. If there is real tension between perfect parallelism and general readability in translation between Western languages, then a study of the translation process between other languages could provide insight on resolving it.

Finally, as demonstrated below, parallel translation almost unfailingly produces target texts that are less comprehensible than the source texts, if not downright incomprehensible. Indeed, rigid adherence to the doctrine of parallelism and the translation habits it creates is the most obvious explanation (but not justification) for translations like this one:

| Pour favoriser la reprise de l’acquis, lorsque celle ci n’est pas achevée, et une plus grande effectivité de sa mise en œuvre, la nécessité d’une mobilisation du programme PHARE a été soulignée. | In order to encourage the adoption of the Community "acquis", where this has not yet been completed, and to enhance the effectiveness of its implementation, the necessity to utilize the PHARE programme was underlined. |

The target text is almost perfectly parallel with the source text, and, technically speaking, the translation is acceptable. It is reasonably grammatical (unnecessary passive voice aside) and conveys the same information as the original French text. It is obviously easy to compare with the original, if that was the intended goal. Although it is impossible to say with certainty that

24 Viaggio, 1996.
the unnatural target text is due to a conscious focus on parallelism, it is logical to speculate that even if it was not, it may well have been due to the translator being so in the habit of focusing meticulously on surface parallelism that he has simply forgotten to pay attention to the content. Simply shifting the translation from passive to active voice (by inserting a generic agent) manages to cut the number of words by one third (34 vs. 22) and renders an uncomplicated message in an equally uncomplicated way:

| In order to encourage the adoption of the Community “acquis”, where this has not yet been completed, and to enhance the effectiveness of its implementation, the necessity to utilize the PHARE programme was underlined. | Participants stressed that the PHARE program should be used to promote the adoption of E.U. law and to make it more effective. |

Another example of havoc wreaked by over-parallelism is this:  

| Le but de ce texte est de faire en sorte que des comportements racistes et xenophobes similaires soient punissables dans tous les États membres grace à une définition commune et du rapprochement des sanctions, selon la méthode suivie dans toutes les décisions dans le cadre d’harmonisation. | The aim of the legislation is to ensure that comparable racist and xenophobic behaviour is made a criminal offence in all the Member States by laying down a common definition and by approximating sanctions, in line with the method followed in all the framework decisions on harmonization. |

Incredibly, the translation is actually longer than the original (47 vs. 44 words), and the English is very nearly a word-for-word rendering of the French. Unlike in the first example, though, this translation is barely grammatical: “laying down a common definition” is both ambiguous and...
begs the question, “definition of what?” Additionally, co-opting the word “approximating” to mean “standardizing” is a perfect example of eurojargon, the problems with which are discussed later in this paper.

“Selling” plain-language translation to skeptics can be difficult largely because standard translations are readable, even if only painfully so, for a reader or translator who is experienced in the field. The translation above does indeed transmit the necessary information to a reader with enough English-language skills and background knowledge to make sense of it. Plain language, however, calls for writers and translators to take a step back from their existing knowledge base in order to ask whether the text is comprehensible to a reader without that particular knowledge base. The first rule of fighting fog is, after all, “Put the reader first.”

Although this extract is more technical than the first example, it is still possible to improve the translation simply by paying more attention to what the original text is saying than to how it says it, and by thinking about how one would explain the message to someone with little or no E.U. background. The plain translation is significantly clearer than the original translation, but it is still readily comparable with the source text:

| The aim of the legislation is to ensure that comparable racist and xenophobic behaviour is made a criminal offence in all the Member States by laying down a common definition and by approximating sanctions, in line with the method followed in all the framework decisions on harmonization. | This legislation aims to use the existing harmonization process to establish a common definition and punishment for racist and xenophobic behavior so that it will be punished equally in all Member states. |

Types of Equivalence

In fact, “parallelism” is not even synonymous with “equivalence.” At the root of the debate over parallelism – as well as of many other issues around plain-language translation – is the
difference between "formal" and "dynamic" equivalence as defined by Eugene Nida.\textsuperscript{27} According to Nida, formal equivalence “focuses attention on the message itself, \textit{in both form and content} [emphasis mine],” while dynamic equivalence seeks to produce the same “effect” in target-text readers as the original does in source-text readers even if the external form of the source and target texts do not correspond 1:1.\textsuperscript{28} Emphasis on parallelism fulfills the expectation of formal equivalence, but dynamic equivalence is the single biggest argument in favor of plain-language translation. If the source text is comprehensible and well-organized under the conventions of the source language, why should the target text be muddled and disordered under the conventions of the target language merely to ensure that it \textit{looks} like an equivalent translation?

This is not to say that it is impossible, much less undesirable, for a target text to be both dynamically equivalent and reasonably parallel with the original. Rather, it means that translating within the DGT’s rigid demands for parallelism requires a high degree of attention, and sometimes creativity, to avoid lapsing into formal equivalence for the sake of “keeping up appearances” or out of simple habit. Although the translator may not be able to rearrange paragraphs or rework page layouts, nothing stands in the way of producing dynamically-equivalent sentences and words even within these constraints. For example, this translation of an excerpt from a European Parliament resolution:\textsuperscript{29}

\begin{center}
\begin{tabular}{|l|l|}
\hline
G. considérant que le respect scrupuleux du principe de subsidiarité ne permet pas d’envisager une politique européenne prescriptive mais permet à l’Union d’adopter une stratégie incitative de même nature que & G. whereas scrupulous compliance with the principle of subsidiarity precludes the proposal of a prescriptive European policy, but allows the Union to adopt an incentive strategy of the same nature as its regional and cohesion
\hline
\end{tabular}
\end{center}

\textsuperscript{27} Nida, 1964: 159.

\textsuperscript{28} Ibid.

\textsuperscript{29} Savary, 2009.
The original translation, shown above, is both formally and dynamically equivalent. It is highly parallel, but still roughly equal in terms of comprehensibility. Both fall well within the genre expectations for legal texts in their respective languages. However, genre expectations are not everything, and plain-language proponents hold that murky writing should not be allowed to continue merely because the target audience is resigned to it. With this extract, it is possible to improve the readability of the target text significantly without sacrificing a great deal of surface equivalence. In this case, this is done by maintaining the “not X but Y” formula from the original:

G. considérant que le respect scrupuleux du principe de subsidiarité ne permet pas d’envisager une politique européenne prescriptive mais permet à l’Union d’adopter une stratégie incitative de même nature que sa politique régionale et de cohésion,

G. since careful compliance with the subsidiarity principle does not allow for a prescriptive European policy, but does allow the Union to use an incentive-based approach similar to its regional and cohesion policies,

On another note, it is worth pointing out that the plain-language translation shifts the concept of “envisager” from explicit to implicit, since blocking something from being planned or proposed has the de facto result of preventing it from happening altogether.

Other Expectancy Norms

Formal equivalence isn’t the only expectancy norm that can constrain translation. Translation theorist Andrew Chesterman has identified a range of other expectancy norms, which refer to what the target language community expects a translation to look like “regarding grammaticality, acceptability, appropriateness, style, textuality, preferred conventions of form.
or discourse and the like." While these expectations can also take the form of conventions or simple tendencies, Chesterman holds that norms are different in that violating them can "justly" draw criticism.  

Chesterman divides expectancy norms in English into two broad categories: qualitative and quantitative. Qualitative norms are those which can be considered elements of good style, including conformity with grammatical rules. Examples include end-loading (placing old information at the beginning of a sentence and new information at the end) and cohesion (creating explicit links between ideas and sentences to guide the reader through the text). Quantitative norms are more numerous and more complex, but those which are relevant here include syntactic features (sentence length, clause structures, etc) and collocations. Norms are selected and applied in translation based on a number of factors such as text type, genre, and target audience. According to Chesterman, it is the translator's job to determine which norms are important to a particular translation situation and to decide how best to account for them when choosing a translation strategy. One way of integrating the applicable norms into the translation strategy for a given text type or genre is by using Skopos theory, which will be discussed later in this paper.

The difficulty of allowing reader expectations to influence translation strategy is that these expectations are often unconscious, difficult to pinpoint, and generally unnoticed until they are violated. They are also frequently culturally bound and can vary significantly across cultures. The translator may find himself at the mercy of readers who complain that the text "just isn't right," based not on objective analysis but rather on the readers' past experience of texts they

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31 Chesterman, 1997: 84.
perceive to be similar. This can certainly be a fair criticism, since texts within a given genre should indeed share certain features that are characteristic of that genre.

On the other hand, popular opinion is clearly not the only yardstick that should be used to evaluate translations. First, readers’ expectancy standards may be inappropriately low due to decades of conditioning. While everyone will complain while programming a DVD player or assembling new furniture, incomprehensible instruction manuals are taken practically as a fact of life. This doesn’t mean, though, that instruction manuals shouldn’t be readable. On the other hand, reader expectations can also make it extremely difficult for translators to change course once bad form has become deeply entrenched, because readers view the warped version as contextually appropriate. A translator who suddenly begins producing simple, coherent, and concise target texts for an international legal body could easily be accused of “dumbing down” the content by readers who are accustomed to complex and convoluted translations, even if the plain version is ultimately a more faithful and detailed rendering of the original. As Chesterman points out, though, “Norm-breaking may lead to criticism, but it may also lead to better norms.” This is the basic creed of the plain language movement.

These issues of parallelism and equivalence are particularly relevant in light of the E.U’s “equal status” multilingualism policy, namely that there is no official distinction between “source text” and “target text.” Once all of the language versions have been approved and published, one cannot be considered any more or less authoritative than any of the others. As a result, producing an unnatural translation for the sake of preserving external similarity to The Original (which officially doesn’t exist) is indefensible even from an E.U.-policy standpoint.

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B. Bucking Trends: Specialized Language and Jargon

Particularly challenging is the question of jargon in translation, since it is influenced by a number of factors – not least of which is the fact that the concept of “jargon” itself is subjective. One language, expert, or organization’s “terminology” or “specialized language” may well be another’s jargon or even gobbledygook, a fact that is magnified by translation. Even though every clear-writing resource discusses the evils of jargon, translators who are non-experts in a given subject area may not feel comfortable substituting everyday words for more technical ones, both for fear of making a mistake and because of pressure from readers who associate jargon (or its more refined cousin, “terminology”) with expertise. Jargon-busting also requires much more attention and mental energy than the alternative, as explored later in this paper during the discussion of deverbalization as a translation technique.

It is important to note that jargon, unto itself, is not unique to the world of international organizations or even to the written word. Jargon, the definition of which includes “the technical terminology or characteristic idiom of a special activity or group,” develops wherever there is a group of people who share a common frame of reference and communicate regularly with one another, whether that group is comprised of lawyers or teenagers. Professionals in every field, from plumbing to banking, have their own unique terms and ways of communicating, and specialized language can and does serve a legitimate role in communication.

For example, aspects of the following translation can communicate very specific information in a concise manner – but only to an informed reader:

L’Union Européenne de Radio-Télévision (UER) attache une grande importance au réexamen du cadre réglementaire des communications et soutient l’approche horizontale proposée par la Commission. En effet, une approche cohérente et coordonnée de la réglementation des réseaux

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38 “Jargon”
et des services de communications électroniques est nécessaire face au phénomène de convergence technologique

Cadre réglementaire, or “regulatory framework,” is shorthand for “the due process of regulation surrounding a single topic [...] that entails all of the relevant legislative documents (acts, regulations, annexes) and describes the federal agency responsible for administrating the framework.” Technological convergence is an audiovisual industry term for the trend toward devices that can perform a variety of different tasks, e.g. cell phones that serve as telephones, cameras, alarm clocks, calculators, and music players. While these terms can be replaced with less technical ones, doing so must be based on a decision that the benefit (increased clarity for non-professional readers) outweighs the cost (loss of precision). The answer to this question will vary from one occasion to the next, as a function of the target audience and the term’s level of technicality.

On the other hand, “horizontal approach” is an example of pure jargon: although it is an extremely common collocation in business and government, it does not actually say anything that cannot be said by a more standard turn of phrase. As a result, the cost of replacing it is negligible in comparison to the benefit from improved readability.

Even while keeping two of the three “technical terms” in this extract, the translation can be improved by replacing “weak” or vague verbs (“attaches great importance,” “is necessary”) with stronger ones, i.e. “strongly supports” and “calls for”:

| The European Broadcasting Union (EBU) attaches great importance to the review of the European Broadcasting Union (EBU) strongly supports the Commission’s proposed |  |

39 European Commission, 2000
40 U.S. Food and Agriculture Organization, 2007
41 McGuigan
One option for sidestepping the question of specialized language vs. jargon would be to provide, where possible, a glossary of key terms used in the text. This is not unheard of in official documents, but nor is it standard practice. If, as I propose, the difference between specialized language and jargon is the existence or lack of a commonly accepted definition which allows the term to act as industry shorthand for an otherwise long and complex explanation, then pre-defining potentially unclear terms could allow them to act as a sort of “provisional” specialized language within that particular text, whether or not they have standard definitions in the broader context. While this may not technically be in the spirit of the plain language movement, it would serve as a practical compromise between the need for precision and the need for readability.

**Jargon in the E.U.**

As a massive specialized institution, the E.U. is a breeding ground for jargon, terminology, and acronyms. And, perhaps ironically, the E.U.’s own clear-writing style guide (“Fight the Fog”) takes pains to explain that “eurojargon” and “eurospeak” are not the same thing. It defines eurojargon as “a language used by any group of insiders or specialists to communicate with each other in a way that cannot always be understood by outsiders,” while eurospeak is “a potentially useful language coined to describe European Union inventions and concepts which have no exact parallel at the national level.” The implication is that eurospeak is acceptable

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while eurojargon is to be avoided, but the line between the two in practice is not at all clear. The official EuroSpeak glossary alone boasts 233 separate entries, from “Abstention, constructive” to “Youth,” while the “Plain language guide to Eurojargon” covers almost 100 more terms ranging from “Absorption capacity” to “Unanimity.”

There is no apparent explanation or consistency for why a term is assigned to one category or the other, and the European Commission’s own web tutorial on writing clearly is almost comically unhelpful on the subject:

**What counts as jargon?**

Working in the EU environment can make you jargon-blind.

We might all recognise e.g. *subsidiarity* or *countervailing duties* as technical jargon - but **EU language is full of many less obvious jargon terms**, influenced (especially) by legal/diplomatic terminology.

For example, when did you last negotiate your *accession* to a gym or sports club, or go on holiday to a *third country*?

And in English - the original language of most web texts - there is the extra problem of *false friends*, mostly from French.

The comments above constitute the entirety of the “explanation” about jargon. The tutorial goes on to provide further examples of various types of jargon, but never actually answers its own question: What counts as jargon?

According to Emma Wagner, former head of the DGT and one of the creators of the Fight the Fog campaign, multilingual supranational organizations are particularly prone to jargon because communication takes precedence over language. Wagner argues that translation’s role in organizations like the E.U. is to allow the organization “to be able to function in the same way as it would if it were monolingual.” As a result, linguistic creativity such as jargon is tolerated

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43 “Glossary”
44 “Eurojargon”
45 “Words and style”
as long as it allows for increased efficiency or convenience in communication. If permitted long enough, however, jargon can eventually grow to actually inhibit communication because the working language has undergone so many permutations that it is no longer comprehensible to newcomers or to the general public, and specialists have lost the ability to communicate in any other way.

Not all specialized language or jargon is created out of thin air; the acceptance of false cognates in translation is also a type of jargon. “Fight the Fog” lists about a dozen of the most commonly accepted false cognates, including “adéquat”/“adequate” (instead of “suitable”), “acquis communautaire”/“acquis” (instead of “body of EU law”), and “pays tiers”/“third countries” (instead of “non-member countries”).\footnote{European Commission, 1998: 11.} False cognates can of course cause problems in any translation, but the specific challenge in this situation is that certain false cognates are so pervasive in E.U. culture that the correct terms may actually appear in comparison to be mistranslations.

Dangers of Jargon

While there is an appropriate time and place for specialized language, it is not without its hazards, especially when it drifts (or is frog-marched) over the line into jargon. The most obvious danger of jargon is the potential it creates for misunderstandings. English is one of the E.U.’s three main procedural languages, along with French and German,\footnote{“EU languages”} and an extremely large proportion of E.U. functionaries and citizens are not native anglophones. Particularly where everyday words like “approximate” [v.] and “premium” (meaning “to broadly align” and “allowance/subsidy”\footnote{“EU jargon in English”}) have been appropriated and assigned new meanings, even non-native speakers with a high level of English may struggle to understand documents written in eurojargon.

\footnote{European Commission, 1998: 11.}
\footnote{“EU languages”}
\footnote{“EU jargon in English”}
Another pitfall of jargon is that it sets up a barrier between those who understand it and those who don’t. Given the E.U.’s current information-access climate, these are dangerous waters. More than one-third of the inquiries handled annually by the European Ombudsman’s office are related to citizens’ concerns about institutional transparency, and although transparency and freedom of information are often spoken of in terms of physical access to government documents, such documents are useless if they are so riddled with jargon as to make them unreadable to everyday citizens. The European Commission itself prioritizes the general public above E.U. insiders and outside specialists, calling it the “largest and most important” audience for its documents, which leaves no room to continue with the use of eurojargon merely for the convenience of the experts.

The issue of transparency is critical in any discussion about jargon in the political sector. While jargon may indeed be a naturally and innocently occurring phenomenon in the E.U., critics and even some E.U. insiders have alleged that it has at times been used deliberately to prevent citizen participation. One notable example is the E.U. “reform treaty” drafted after the European Constitution was rejected in 2005 by French and Dutch voters. Giuliano Amato, former Italian prime minister and one of the drafters of the reform treaty, made waves in 2007 when he claimed that the reform treaty had deliberately been made “unreadable” to citizens in an effort to ward off calls for another set of national referendums that could again jeopardize its passage into law. Considering citizens’ ongoing concerns and the potentially damning effects of more allegations like Mr. Amato’s, continuing down the same path of complex writing and unnecessary jargon is a politically dangerous move for the E.U.

There is no one-size-fits-all method of reducing jargon in translation, not least because the E.U.’s multilingualism policy virtually ensures that eurojargon exists equally in all languages and thus there is always an easy way out of having to find a colloquial translation. If a target text

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50 “Transparency at the EU level”
maintains the same degree of euro-murkiness as the original, the translator will (or at least should) have to answer for violating the E.U.’s plain-language mandate. If he opts for a plain-language translation however, he is first committing himself to a much more time- and labor-intensive process than he would otherwise have faced; second, he is putting his confidence in his own understanding of the source-language jargon and his ability to simplify it in the target text; and third, he is risking criticism from readers who feel that a plain translation represents a subpar understanding or rendering of the original text or indicates that something has been lost between the source and target texts. Given these factors, it is almost little wonder that translators so often opt for 1:1 terminology “equivalents” or even commonly-accepted false cognates in the interest of playing it safe.

Skopos Theory
Theoretically speaking, the decision on how far to naturalize a text is not made in a vacuum. At the root of plain-language translation lies Skopos theory, pioneered by Katharina Reiss in the 1980s. Skopos theory argues that, as a general rule, translation strategies should be tailored to the purpose of the target text as determined by the translator.\textsuperscript{53} Reiss also introduced the concepts of text types and postulated that by using the type and genre of the source text to define its larger purpose, or "function," the translator can decide which strategic aspects to prioritize in the translation process in order to achieve the desired function (be it the same or different) in the target text and culture.\textsuperscript{54}

Reiss identified three main text types: informative (emphasis on content, such as a newspaper article), expressive (emphasis on the arrangement of the content, such as drama or literature), and operative (emphasis on content that is intended to persuade the reader to do something, such as advertising).\textsuperscript{55} She acknowledged that the types are not mutually exclusive, but she worked from the assumption that one text type is nearly always dominant and argued that the

\textsuperscript{53} Vermeer, 1978: 100.
\textsuperscript{54} Schäffner, 2001.
\textsuperscript{55} Reiss, 1981.
focus is the aspect that should be carried from the source to the target text.\textsuperscript{56}

Reiss’s other functional criterion for evaluating texts is that of genre. In contrast with text type, which is determined primarily by the text's internal characteristics (i.e. its content and how the content is arranged), "genre" refers to the text's external form and purpose, e.g. a newspaper article vs. a recipe vs. meeting minutes, etc. All three fall can be classified as "informative," but they bear marked external differences such as layout, tone, level of familiarity with the reader, language register, etc. Unlike text types, genres may overlap significantly and there is no neat method of categorizing them.\textsuperscript{57} The role of genre in translation goes back to Chesterman’s argument regarding expectancy norms, i.e. that the translator should consider (but not be enslaved to) readers’ expectations for the specific genre within which he is translating.

\textit{Applying Skopos Theory}

Skopos theory, in and of itself, is not a prescriptive approach. At its most basic level, it is almost anti-prescriptive: its main tenet is that the translator should be in control of the translation process and that the process should reflect the purpose of the translation.\textsuperscript{58} Although no E.U. translator will ever be given a “blank check,” stylistically speaking, Skopos theory’s emphasis on making the approach fit the translation can help the translator decide how drastically to apply plain language principles.

E.U. translators face texts in a limited range of types (almost exclusively informative) but a wide variety of genres: legislation, meeting minutes, speeches, journal articles, position papers, and more. Under Skopos theory, the translator should be in control of the translation and should be able to tailor the target text to meet the expectations of the target language for that particular type or genre. In E.U. reality, translators are handed a literal one-size-fits-all template for each genre and told to fill in the blanks, whether or not this results in the most accurate or fluent

\textsuperscript{56} Schäffner, 1998.
\textsuperscript{57} Lee, 2002.
\textsuperscript{58} Schäffner, 1998
Skopos theory holds that target culture is a major factor in determining how a translator should approach a translation,\textsuperscript{59} and plain language theory postulates that the linguistic "culture" of lay readers (one of the E.U.'s three stated target audiences\textsuperscript{60}) of English-language E.U. texts is not receptive to the language that currently passes for English in international organizations. This is where plain-language advocates have a strong basis for appealing to the translator's freedom under Skopos theory to adapt his strategy in order to accommodate the goal of writing an intelligible target text.

\textit{Documentary vs. Instrumental Translations}

One aspect of a text's skopos is whether the translation is intended to communicate to the reader \textit{what} the original text says, \textit{how} it says it, or some combination of the two. In this vein, Christiane Nord proposes two categories of translation: documentary and instrumental. Documentary translation "serves as a document of a source culture communication between the author and the ST recipient".\textsuperscript{61} In other words, the ultimate goal is for the target-language reader to see precisely \textit{how} the message of the source text is presented in the source language, even if the resulting target text is not as fluent or natural as it otherwise could be. In contrast, the goal of instrumental translation is for the target text to serve as an "instrument" for transmitting the original message.\textsuperscript{62} Instrumental translation is thus focused on the "what" rather than the "how".

One of Reiss's primary concerns was the distinction between content-focused and form-focused texts. In fact, this brings up one of the primary problems with "un-plain" translations: they consist of content-focused texts that have been translated like form-focused ones. Using

\begin{itemize}
  \item \textsuperscript{59} Schäffner, 2001.
  \item \textsuperscript{60} European Commission, 1998.
  \item \textsuperscript{61} Nord, 2005: 80.
  \item \textsuperscript{62} Nord, 2005: 81.
\end{itemize}
Nord’s categories, we would say that E.U. translations are too often treated as documentary when they should be instrumental. Unless there is a specific reason that the target reader needs to be aware of precisely how the message is communicated in the source language (for example, in a debate over the wording of a draft law or resolution), E.U. translations should serve as instruments for transmitting information to readers in whatever way is most appropriate under the conventions of the target language and culture.

C. Time- and labor-intensive: deverbalization and intralinguistic translation
As we have already seen, rote parallelism and jargon-for-jargon translation are easy traps to fall into, and any plain-language translation approach should suggest ways to avoid them. However, Skopos theory suggests that the translation process should be tailored to each individual translation, which means that plain language cannot be used as a blanket approach. As shown previously, there are times when increased readability does not justify loss of precision, particularly in technical documents where the audience is well-versed in the relevant jargon. In other words, the most appropriate translation is not always the plainest one, but the determination must be made on a case-by-case basis.

The push for plain language in translation is, after all, a plea for translators to think about what they are doing. Switching to a plain-language model requires the translator to be awake on the job and constantly mindful of opportunities and ways to make the translation clearer, while simultaneously observing the particular constraints and expectancy norms that apply to the specific text or genre. For an “assembly-line” translator accustomed to translating line by line in the interest of efficiency, this is a very great demand indeed.

Because of these factors, the final roadblock to plain-language translation is that it quite simply requires a larger investment of time and energy by the translator. This is obviously true when any new approach is being learned, but, in the case of plain-language translation, the investment is an inherent part of the process and doesn’t end once the approach has been
“learned.” There are two specific reasons that plain-language translation increases the translator’s mental workload: 1) deverbalization and 2) intralinguistic translation.

Deverbalization

The first step in producing a natural target text is to separate the message of the source text from its external form in a deliberate way, which is a very general definition of “deverbalization.” It involves identifying both the message the author intends to transmit and the message that target readers are likely to actually receive, identifying or understanding the key components, and re-rendering it in the target language without depending on the external form of the original. This concept of “going beyond the external form” can be approached in two ways: the interpretive model and Nida’s three-step model.

The word “deverbalization” itself is most often associated with interpretation and the Paris School of theorists at the Ecole superieur des interprètes et des traducteurs (ESIT) in Paris, specifically the interpretive model developed by Marianne Lederer and Danica Seleskovitch. Lederer and Seleskovitch’s model originally involved three phases: understanding, deverbalization, and re-expression, while Jean Delisle later added a fourth stage: verification.63

The first phase, understanding, relies on “both knowledge which is pre-supposed by language and knowledge that is implied in discourse.”64 In other words, the translator must take account of both the explicit and implicit meaning of the text in order to fully grasp what the author intends to say. This calls for linguistic knowledge of the source language used, background knowledge of the subject, and understanding how the author’s ideas are linked to one another.

Once the translator understands the source text, the second step is to “retain what has been understood while the words themselves disappear.”65 Lederer argues that when a text is truly

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63 Munday, 2008: 63
64 Lederer, 2003: 23
65 Lederer, 2003: 13
understood, the original words and linguistic structures are no longer necessary and should be allowed to fade away, leaving behind only the “sense” (i.e. the meaning) in the translator’s mind. The sense of the source text, rather than its specific words and structure, is what should be transferred from source to target text during translation. This phase of “understanding and then forgetting” is what Lederer refers to as deverbalization.

After the source text has been understood and deverbalized into the prescribed “wordless” state, the sense can then be re-expressed (the third step) as if the target text were an original, with no connection to the external form of the source text. In Delisle’s fourth step, “verification,” portions of the target text are then back-translated in order to confirm that the translation is an accurate reflection of the original. In plain language translation, verification usually occurs as a result of intralinguistic translation of the target text, a process which is discussed in the next section of this paper.

Although the logic underlying the interpretive model is applicable to the process of translation, it is a particularly difficult technique to apply, since the message of a written text can exist only in words and not – as with spoken language – in tone, gestures, body language, or any other nonverbal cues. If the translator must re-read a particularly complex passage several times before understanding it, it can then become quite difficult to truly forget the source text’s external form. However, the fact that the interpretive model in its purest form is difficult to apply to translation does not rule out the need for some kind of intermediate phase between understanding the source text and reproducing the meaning in the target text.

A similar but slightly different candidate for this intermediate step is Eugene Nida’s three-step model, presented in his 1969 article, “Science of Translation.” Nida held that “instead of going directly from one set of surface structures to another, the competent translator actually goes

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68 Munday, 2008: 63.
through a seemingly roundabout process of analysis, transfer, and restructuring.” Nida argues that the translator should use the first step, analysis, to understand the message in its “simplest and structurally clearest form,” then transfer the message at this level and subsequently restructure it into a target-language form which is most appropriate for the target audience.\(^6^9\)

Nida’s model is not altogether different from the interpretive model in that the result of Lederer’s process of “understanding” is essentially the same as Nida’s “analysis” phase, and both hold that the meaning of the source text, rather than the external form, is what should be preserved in the target text. Re-formulation and re-structuring are also essentially synonymous. The primary difference is that Nida’s model does not explicitly require the form of the source text to be forgotten but only demands that it not unduly influence the form of the target text. Regardless of which model is used, deverbalization is crucial when it comes to producing a target text that sounds natural in the target language, since it serves primarily as a method of divorcing the form of the source text from the form of the target text. Both methods can be used in conjunction with Skopos theory, which helps determine the appropriate form for the target text based on its purpose, type, genre, and intended audience.

In any case, lack of any kind of deliberate separation of meaning from form is one of the leading causes of unreadable target texts. No translator could sit down with this source text:

*Les participants ont relevé que le développement d’un espace audiovisuel européen représente un enjeu à la fois politique, culturel et économique, destiné à favoriser les échanges culturels et une meilleure comprehension entre les peuples européens, ainsi qu’à renforcer la compétitivité des acteurs audiovisuels européens à l’ère de la révolution numérique;*

methodically reduce the message to its simplest and structurally clearest form (whether by wordless deverbalization, point-by-point analysis, or any other method), and proceed to render it as:

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\(^6^9\) Nida, 1969: 484.
The participants raised the question of the further development of a European audiovisual area, which is a major challenge – not only in cultural terms, but also from a political and economic point of view – for the development of cultural exchanges and for a better understanding between the people of Europe, as well as for the reinforcement of the competitiveness of European audio-visual actors in the context of the digital revolution.

The fact that this is a real, published translation – and that similar examples abound – shows that too many translators are prone to skipping both the analysis and the restructuring and proceeding straight to the “transfer” phase. Although Nida held that his model was actually descriptive rather than prescriptive, and that it takes place in lieu of “going directly from one set of surface structures to another,” many of the extracts I have chosen as illustrations point to the contrary: that it is altogether possible and even common for “competent” translators to produce texts that consist of two parallel sets of surface structures and little more. One possible dismantled-and-restructured version of the above translation is this:

The participants pointed out that developing a shared European audiovisual area would make a political, cultural, and economic difference by promoting cultural exchanges and better understanding among the people of Europe, by increasing Europe’s competitiveness in the audiovisual market during the digital revolution.

One explanation for the trend toward structural similarity (i.e. formal equivalence at the expense of dynamic equivalence) is that, as with parallelism and excessive jargon, translators are simply operating on autopilot. After all, thoughtful analysis requires the translator to invest time and energy into truly understanding the text, which may be all the more challenging if the original is particularly technical or jargon-heavy. Digging into what is meant by “organisation commune du marché” in a particular text and deciding how to render it for the intended audience or purpose takes much more time and dedication than automatically translating it as “common market organization” or even “CMO” and moving on.
In some contexts, plain-language translation could also be viewed as a risk on the part of the translator, since paraphrasing (whether inter- or intra-linguistically) will quickly reveal whether or not the translator truly understands the source text. A source text that is muddled or laden with jargon and technical language doesn’t prevent traditional translators from churning out a passable but equally incomprehensible target text by simply translating the external structures. Producing a readable translation by paraphrasing, by contrast, may require the translator to either invest significant research time or else gamble on his understanding of the original. However complex a source text may be, however, (presumed) professional ability and the extensive resources available at the E.U./DGT level render “I couldn’t understand the source text” an unacceptable excuse for producing unreadable translations.

**Intralinguistic translation**

The concept of translation as I have discussed it so far is popularly associated almost exclusively with the transfer of meaning from one language to another, known formally as “interlinguistic translation.” However, plain-language translation necessitates a second process, called “intralinguistic translation” or simply “rewording,” which is “an interpretation of verbal signs by means of other signs of the same language” [emphasis mine].

The addition of intralinguistic translation, whether during the interlinguistic translation process or as a separate step after it, is the primary way that plain-language translation differs from standard translation.

This intralinguistic translation process should ideally occur as part of the re-expressing/restructuring phase of translation, with the translator having succeeded at reducing the source text’s message to its simplest form (the “sense” or “meaning”) during the analysis phase. He then uses this “sense” as the basis for creating a target text that is appropriate for the target audience. If the message cannot be adequately simplified during the analysis phase, however, it is necessary to carry the intralinguistic translation process forward into the restructuring phase as well, always keeping in mind the question, “Is there a more fluent way to

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70 Jakobson, 1959.
Once the target text is complete as an interlinguistic translation, the translator has to re-read it and note ways that it could be further simplified in the target language – essentially editing it as if it were an original text. In itself, this step is not unique to plain-language translation; the difference is that rather than looking strictly for mistranslations of the source text, the translator is actively looking for opportunities to improve the target text. Then he has to recheck the potential improvements against the source text to confirm that they are valid translations (Delisle’s “verification” phase), and find an acceptable middle ground if they are not. Because the plain-language approach emphasizes the text as a whole and not merely words and sentences, translators can’t stop at revising line-by-line or sentence-by-sentence as they can with the traditional approach to translation. This frequently means that the target text must actually be an improvement on the source text, since the translator uses his background knowledge and text analysis to make the text more cohesive as a whole.

Verification is particularly critical in plain-language translation, since multiple levels of rewording within the target language without checking it against the source text can easily steer the translation off course. As the translator becomes more experienced and comfortable with plain language, the number of rewordings necessary to produce a clear target text will ideally be reduced and the process will become integrated into the transfer and restructuring process rather than requiring a completely separate step at the end. At the beginning, though, the additional time and thought required may discourage translators from making plain language a priority. In the words of Mark Twain, “I didn’t have time to write a short letter, so I wrote a long one instead.”
IV. Case Study:

To examine the plain-language approach and principles in context, I will begin by presenting a commented re-translation of a document produced by an audiovisual seminar in Prague in October 2005. The source text is entitled: “Déclaration de Prague : Séminaire audiovisual. ‘Politiques audiovisuelles et diversité culturelle dans une Europe élargie.”

After looking specifically at questions of parallelism and jargon, instances where the “plainest” translation is not necessarily the best, aspects of the original translation that are clearly problematic, and points that are particularly challenging to translate using the plain-language approach, I will discuss some of the general challenges encountered and evaluate how well the plain-language target text lives up to the Fight the Fog principles. Uncommentated versions of the three documents being compared can be found in appendix 2.

The three versions of the document are laid out below as:

<table>
<thead>
<tr>
<th>source text</th>
<th>original translation</th>
<th>plain-language translation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Co-organisé par la France et la République tchèque, dans le cadre de la Conférence européenne et de la Présidence française de l'Union européenne, avec la participation de la Commission européenne et la contribution d'Eureka Audiovisuel, ce Séminaire a</td>
<td>This seminar, which was organised jointly by France and the Czech Republic in the context of the European Conference and the French Presidency of the European Union with the participation of the European Commission and Eureka Audiovisual, brought</td>
<td>France and the Czech Republic, with assistance and participation from the European Commission and Eureka Audiovisual, organized the seminar as part of the European Conference during France’s term as E.U. president, bringing together more than 200 political,</td>
</tr>
</tbody>
</table>

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réuni plus de deux cents responsables politiques, institutionnels et professionnels du secteur audiovisuel des 15 Etats membres de l'Union européenne, des 13 Etats candidats à l'adhésion et de la Suisse.

together more than 200 political, institutional and professional heads from the audio-visual field from the 15 Member States of the European Union, the 13 candidate countries and Switzerland.

institutional, and professional leaders in the audiovisual field from the 15 E.U. member states, 13 applicant countries, and Switzerland.

The original translation is almost perfectly parallel with the original, i.e. one extremely long sentence (69 words in English, actually longer than the original) with numerous introductory clauses before the main verb, which is standard in French but heavy and indirect in English. The plain translation splits the passage into two shorter sentences and begins each one with a clear subject and verb. Additionally, the plain translation corrects a “false friend” that is specifically noted in the “Fight the Fog” style guide: the rendering of “Etats candidats” as “candidate countries” rather than “applicant countries.”

2.

A travers l'examen détaillé de plusieurs expériences positives présentées par des professionnels européens, les débats ont visé à identifier les défis et les opportunités créés par la mise en place d'un marché audiovisuel européen élargi, ainsi qu'à

Through the detailed examination of several successful experiences presented by European professionals the debate aimed at identifying the challenges and opportunities created by the establishment of an enlarged European audiovisual market and to make practical suggestions

The debates looked closely at several positive experiences presented by European professionals in order to identify the challenges and opportunities involved in enlarging the European audiovisual market and to make practical suggestions.
énoncer des propositions concretes susceptible d'accompagner ce processus.

audio-visual market, as well as enunciating concrete proposals, able to accompany this process.

about handling the enlargement.

Again, the original translation is perfectly parallel with the source text, this time resulting in excessive use of nouns as well as general unnecessary wordiness, particularly in the second half. The plain translation converts “examination” and “enlarged […] market” into verbs and drops “establishment” altogether, and deverbalizes the last clause into everyday English, since the clunky and unnatural “…enunciating concrete proposals, able to accompany this process” adds contributes nothing to the text except unnecessary complexity.

Only two sentences into the text, we encounter the first illustration of why “Fight the Fog” is not a one-size-fits-all approach: the French “opportunités”. “Fight the Fog” lists “opportunity” as a false cognate and recommends “advisability” instead, but this instance may in fact be a case where French has been influenced by English rather than vice versa, since “opportunité” clearly intends to contrast a negative (“challenge”) with a positive (“opportunity”).

3.

Dans cette perspective, les participants ont souligné l’importance des points suivants :

1/ Ils ont fait valoir la spécificité et l’importance du secteur audiovisuel pour la

Within this framework, the participants underlined the importance of the following points:

1/ They emphasised the specific nature and the prominent role of the audio-

The participants highlighted three key points:

1) The audiovisual sector is a unique and important part of preserving and
préservation et la promotion de la diversité et de la richesse des cultures européennes, dans le cadre de la construction d’une Union européenne élargie.

2/ Ils ont insisté dans ce contexte sur l’importance d’un cadre juridique adéquat pour le développement du secteur audiovisuel, au niveau national et européen, en vue de la constitution d’un espace audiovisuel européen cohérent.

visual sector in the preservation and the promotion of the diversity and the richness of European cultures, in the context of the construction of an enlarged Europe Union.

2/ In this context, they insisted upon the importance of an adequate legal framework for the development of the audiovisual sector on both national and European levels in order to create a coherent audiovisual European area.

promoting European cultural richness and diversity during E.U. enlargement.

2) Audiovisual development must be appropriately supported by national and European legal frameworks in order to create a coherent European audiovisual area.

Point number two in this section brings up the question of jargon. “Coherence” is an E.U. buzzword that can be defined in this case as “The systematic promotion of mutual reinforcement of policy actions across government departments and agencies, creating synergies so that the internationally agreed […] goals can be achieved”72 (a definition which is itself a poster child for the plain language campaign). In this instance, “coherent” is a prime example of a buzzword that is too ambiguous to be considered strictly a term of art but too specialized and widely used to be replaced with a more everyday term like “united” or “consistent.”

72 “Proceedings”
4.

<table>
<thead>
<tr>
<th>Ceux des candidats qui n’ont pas achevé la reprise de l’acquis communautaire en matière audiovisuelle ont réaffirmé leur détermination à le faire le plus rapidement possible.</th>
<th>Those applicant States which have not yet completed the adoption of the Community “acquis” in the audio-visual field reaffirmed their determination to do so as soon as possible.</th>
<th>The applicant countries which had not adopted E.U. laws for the audiovisual field confirmed that they planned to do so as soon as possible.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pour favoriser la reprise de l’acquis, lorsque celle ci n’est pas achevée, et une plus grande effectivité de sa mise en oeuvre, la nécessité d’une mobilisation du programme PHARE a été soulignée.</td>
<td>In order to encourage the adoption of the Community “acquis”, where this has not yet been completed, and to enhance the effectiveness of its implementation, the necessity to utilize the PHARE programme was underlined.</td>
<td>Participants stressed that the PHARE program should be used to promote the adoption of the E.U. body of law and to make it more effective.</td>
</tr>
</tbody>
</table>

“Acquis communautaire” is a highly problematic term to translate. The original translation borrows the French but sets it off with quotation marks, rendering the concept both unclear and unduly emphasized. The “Fight the Fog” guide recommends “EU body of law” in its place,\(^73\) which works in the second instance but would be awkward in the first. Because the technical meaning of the term is not extremely important in this particular text, I chose to alter it to

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\(^73\) European Commission, 1998.
reflect the general idea rather than the term of art, which is apparently under-recognized anyway.

5.

| 3/ Les participants ont relevé que le développement d’un espace audiovisual européen représente un enjeu à la fois politique, culturel et économique, destiné à favoriser les échanges culturels et une meilleure compréhension entre les peuples européens, ainsi qu’à renforcer la compétitivité des acteurs audiovisuels européens à l’ère de la révolution numérique. | 3/ The participants raised the question of the further development of an European audiovisual area, which is a major challenge – not only in cultural terms, but also from a political and economic point of view – for the development of cultural exchanges and for a better understanding between the people of Europe, as well as for the reinforcement of the competitiveness of European audio-visual actors in the context of the digital revolution. | 3) that developing a shared European audiovisual area would have a political, cultural, and economic impact by promoting cultural exchanges and better understanding among the people of Europe and increasing E.U. competitiveness in the audiovisual market as the digital revolution continues. |

Again, the original translation actually manages to be longer than the source text, this time by an inexcusable forty percent (51 vs. 71 words). In all three points, eliminating the repetition of “the participants [verb]ed that...” is an obvious way to cut down on bulk without sacrificing any content whatsoever. This passage is also a prime candidate for transforming nouns into verbs: the plain version cuts the number of nouns by 50% (17 vs. 9).
L’existence d’un système dual, caractérisé par un système public fort et un secteur privé dynamique, est l’une des clés de voûte de l’Europe de l’audiovisuel. Il doit être conforté par la sécurisation juridique du financement des chaînes publiques. Cela leur permettrait notamment, dans le cadre de leur mission de service public et aux côtés des autres opérateurs de ce secteur, de profiter pleinement des nouvelles possibilités offertes par le développement des technologies de l’information (chaînes thématiques, télévision numérique hertzienne, Internet, services radiophoniques).

| L’existence d’un système dual, caractérisé par un système public fort et un secteur privé dynamique, est l’une des clés de voûte de l’Europe de l’audiovisuel. Il doit être conforté par la sécurisation juridique du financement des chaînes publiques. Cela leur permettrait notamment, dans le cadre de leur mission de service public et aux côtés des autres opérateurs de ce secteur, de profiter pleinement des nouvelles possibilités offertes par le développement des technologies de l’information (chaînes thématiques, télévision numérique hertzienne, Internet, services radiophoniques). | The existence of a dual system in which a strong public service and a dynamic private sector coexist is the keystone of audio-visual Europe. It has to be reinforced by legally securing the financing of public channels. The later [sic] will enable them, in particular within the remit of public service and alongside with [sic] the other actors of the sector, to take full advantage of the new opportunities offered by the development of information technologies (thematic cable and satellite channels, digital terrestrial television, the Internet and radio services). | A European audiovisual space must be based on a strong public system combined with an active private sector. This combination should be strengthened by legal protection of financing for public channels so that they can fulfill their public-service mission alongside other operators by taking full advantage of the opportunities created by new information technology (themed channels, digital terrestrial television, the internet, and radio services). |

Because of its complexity, the message of the first sentence in this passage was particularly difficult to reduce to its “simplest form” before transferring, and the plain-language version went through several incarnations before arriving at the one shown above. While the original translation works as a parallel translation, the key to creating a plainer version was inverting
the structure and using “Y must be based on X” instead of “X is the basis of Y.” The plain translation does lose some of the emphasis on the dual system as the “keystone” or “core” of the European audiovisual space, and indeed loses the explicit mention of a “dual system” at all, but all the basic components of the original’s meaning are present.

The second sentence in the re-translation is another example of a passage where strict adherence to plain-language guidelines would not improve the translation. Fight the Fog recommends splitting long sentences into “short” ones (suggesting an average of 20 words per sentence), and combining two sentences into one would appear to move away from this goal rather than toward it. However, the overall effect is clearly an improvement since this paragraph communicates the same amount of information as the original translation but with only two-thirds the number of words (60 vs. 89).

Finally, “digital terrestrial television” is not at all a naturally-occurring turn of phrase. However, I could find no way to simplify or rephrase it without losing the specificity of the concept it denotes. Because it does have a commonly accepted definition (digital transmission of sound and visual signals to an aerial antenna as a method of broadcasting television programming) and because it is directly relevant to the target audience for the document (people involved or concerned with the European audiovisual market), it makes sense to preserve the technical term.

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7. Le développement d’instruments nationaux et européens – ces derniers dans le cadre des PHARE and MEDIA programmes, and Developing national and European tools (within the PHARE and MEDIA programs, the European Commission)

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75 Broadcasting Commission
Comparing the published original and the plain-language translation of this section is almost moot due to the glaring punctuation error that splits the original translation into two ungrammatical fragments. If the mistake was on the part of the translator, then this extract alone would demonstrate that he or she did not take the time to re-read the translation before submitting it.

For the sake of discussion, we will read the sentence as it was intended: “...EBRD, EIB and EIF – in order to stimulate production...”. Of particular note is the fact that the translator rightly balked at including both the full names and acronyms of organizations that would not be mentioned again in the text, but erred in the wrong direction by choosing to keep the acronyms
rather than the names. While the organizations mentioned may be familiar to experts in the field, opting for acronyms turns the sentence into alphabet soup. In the plain-language version, keeping the full names but adding parentheses helps the reader follow the flow of the sentence without getting bogged down in the names of the programs and organizations. Additionally, the plain-language translation makes “promoting X, Y, and Z…” the means of achieving the goal rather than the purpose, a shift that is supported by logical inference from the source text rather than by an explicit statement.

8.

| Ils ont considéré la participation prochaine des pays candidats au programme MEDIA comme un élément essentiel dans la stratégie de préadhésion, et appelé au développement de mesures d’accompagnement, en particulier dans le cadre du programme PHARE, afin de garantir l’équilibre du programme et son accessibilité à tous les professionnels concernés. | The forthcoming participation of candidate countries to the MEDIA programme being an essential aspect of the pre-accession process, participants ask for the establishment of accompanying measures, in particular in the framework of the PHARE programme, in order to guarantee the balance in that programme and its accessibility to all professionals concerned. | Participants noted that applicant countries’ forthcoming participation in the MEDIA program is essential for the pre-accession process and called for measures to support them, particularly in the PHARE program, so that the program will be balanced and accessible to all the professionals involved. |

Oddly, the original translation in this case borrows a common French construction that is not present even in the source text: a long and heavy clause preceding the subject and verb of the sentence. The plain-language version uses a simple formula: “The participants noticed X and consequently demanded Y for the purpose of Z.”
“Mésures d’accompagnement” is an interesting example of eurojargon. Neither it nor “accompanying measures” appears in the Eurojargon or Eurospeak glossary, but it is clearly a well-loved term, as a search in the europa.eu database turns up more than nine thousand instances in English alone. However, it does not appear to have any specialized meaning: in every one of the dozens of instances examined for this paper, “accompanying measures” are, quite simply, the concrete measures that accompany a new law or program. This is a case where the only reason to keep a jargon-ized term would be to demonstrate familiarity with E.U. parlance, since the text stands to lose nothing by replacing it with a more explanatory translation.

9.

| Les participants ont estimé essentiel que, conformément au traité de l’Union européenne, l’application du droit de la concurrence prenne en compte la spécificité culturelle de ce secteur et permette l’émergence de grands groups européens en vue de la création d’une véritable industrie culturelle européenne dans le contexte d’une concurrence mondiale. Le pluralisme devra être respecté sur chacun des | The participants considered that it was essential that, in accordance with the European Union Treaty, the implementation of competition law takes into account the cultural specific features of the audio-visual sector and allows the formation of major European groups with a view to creating a real European "cultural industry" in a world-wide competitive audiovisual market. Pluralism should continue to be respected on | The participants felt that the application of laws on competition must, within the framework of the E.U. treaty, take into account the cultural specificity of the audiovisual sector and permit the formation of large European groups, with the goal of creating a true European cultural industry in the global market. Pluralism in the markets involved must be respected. |
Les participants ont réaffirmé la légitimité des aides publiques à la création et à la diffusion des œuvres cinématographiques et audiovisuelles, dans le respect des règles du traité de l’Union européenne. Ils ont demandé à la Commission européenne de clarifier sa réponse sur cette question déterminante pour le renforcement de la diversité culturelle.

The participants reaffirmed the legitimacy of public aid for the creation and broadcasting of cinematographic and audiovisual works, in accordance with the rules of the European Union treaty. They requested the European Commission to clarify its response to this question, which is a deciding factor for the strengthening of cultural diversity.

The participants reaffirmed the legitimacy of public funding for the creation and distribution of film and audiovisual works, within the rules of the E.U. treaty. They requested clarification from the European Commission about its stance on public funding, which is critical for strengthening cultural diversity.
And finally, the participants strongly affirmed that the capacity to define and develop national and Community policies to safeguard and to promote European cultural diversity should be rigorously promoted within multilateral bodies.

Finally, the participants emphasized that multilateral bodies should strongly support the ability to create and develop national and Community policies for protecting and promoting Europe’s cultural diversity.

Again, the original translation is readable, but it is excessively parallel with the French, e.g. “requested the European Commission to clarify.” This is one case where the plain translation actually inserts a noun rather than removing one, since “request + noun” is a standard collocation in English.

The second paragraph alone illustrates three of the rules for fighting fog: 1) Avoid the passive voice, 2) manage stress, and 3) name the agent. The content of the two translations is almost identical, but re-arranging it puts the stress back where it belongs, namely on the “Who” and the “What,” in that order.

Observations
On the whole, this case study demonstrates some of the key problems with traditional translations, as well as the solutions found (and/or other problems created) by applying plain language principles. It also demonstrates that traditional translations are not always terribly far from the mark, but can nearly always be improved by a more careful analysis of the source text and a stronger focus on producing a natural target text. Re-reading the target text as an original
text is critical, since this is the only way to identify points where the external form of the source text has unduly influenced the form of the target text.

Knowing the context of a source text (in this case the general situation of the European audiovisual industry) is tremendously helpful in producing a readable target text. It is no coincidence that both Lederer and Nida stress understanding/analysis as the first step in the translation process, since plain-language translation calls for the translator to act not only as a linguistic intermediary but also as an advocate for the reader. If the translator himself does not understand the author’s intended message, which in this case relies heavily (albeit indirectly) on the ultimate goal of the audiovisual seminar and the motivation behind the participants’ actions, it will be impossible for him to close the gaps between what the author believes he has said and what the reader is actually likely to understand. At the most basic level, the plain-language movement is about making the two the same (as much as realistically possible) regardless of knowledge gaps between writer and reader.

The challenge of this particular document was that it reflects only a very small aspect of a much bigger picture, which makes it difficult for the translator to grasp how the various points are linked together. One aspect of this difficulty is the plain-language recommendation of managing the stress in sentences by putting old information at the beginning and new information at the end. Managing sentence stress requires in part that the translator actually know or at least be able to logically deduce which information is already known to the reader (which is not always determined strictly by what has already been mentioned in the text), and this is extremely difficult if the translator is even less informed than the reader.

Managing stress within the text is further complicated in a document like this one, where one paragraph in the source text is not necessarily linked to the next, or worse, where there are not necessarily even links from one sentence to the next. This is the case with the two sentences in extract #9. The connection between them – i.e. whether the second sentence carries on from the first in the vein of “as a result”, “however”, “to this end,” “additionally,” or is not connected
at all – is not readily visible, nor can it be confidently inferred. As a result, whatever link may
exist remains as logically obscure in the translation as it is in the original. Rather than inferring
old vs. new information based on the previous sentence, the translator must either draw from
his background knowledge or simply make his best guess. This is why a plain-language approach
is riskier than a traditional one, which would allow the translator to leave logical or cohesion
gaps in the original text uncorrected.

Statistics
On a quantifiable level, how does the plain-language translation compare to the original
translation and the Fight the Fog principles? These figures indicate both the pure totals and the
percentages as compared to the source text (rounded to the nearest tenth of a percent):

<table>
<thead>
<tr>
<th></th>
<th>Source text</th>
<th>Original translation</th>
<th>Re-translation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total word count:</strong></td>
<td>651</td>
<td>664 (102%)</td>
<td>515 (79%)</td>
</tr>
<tr>
<td><strong>Total no. of nouns:</strong></td>
<td>177</td>
<td>168 (95%)</td>
<td>123 (69.4%)</td>
</tr>
<tr>
<td><strong>Total no. of sentences:</strong></td>
<td>16</td>
<td>16 (100%)</td>
<td>15 (93.7%)</td>
</tr>
<tr>
<td><strong>Avg. words per sentence:</strong></td>
<td>40.7</td>
<td>41.5 (102%)</td>
<td>34.3 (84%)</td>
</tr>
</tbody>
</table>

The totals for overall word count and number of nouns in the plain-language translation are
clearly a tremendous improvement over the original translation. On the other hand, given that
the average word per sentence in the re-translation is still far above both the Fight the Fog
recommendation (20) and the general average in English-language government documents
(25).\textsuperscript{76} This, along with the fact that the number of sentences (which should have increased, in
theory) has actually gone down, suggests that the re-translation may not have been aggressive
enough about breaking long sentences up into shorter ones. For example, the re-translation of
section #9:

\textsuperscript{76} Chesterman, 1997: 83.
The participants felt that the application of laws on competition must, within the framework of the E.U. treaty, take into account the cultural specificity of the audiovisual sector and permit the formation of large European groups for the purpose of creating a true European cultural industry in the global market.

There are several possible ways to divide this 50-word sentence into two shorter ones, but it must be done by thinking about the actual message of the sentence instead of merely looking for a convenient point to place a full stop. The first option would be to end the first sentence after “audiovisual sector” and begin a new sentence with “The laws must...“, but this would be highly repetitive given that the subject and verb are identical to the clause in the preceding sentence. Alternatively, the first sentence could be ended after “…large European groups” and begun again with “The goal is to...”, but this causes some loss of cohesion and clarity by putting the means and the end in separate sentences.

The best option for splitting the long sentence into shorter ones is this:

The participants felt that the application of laws on competition must, within the framework of the E.U. treaty, take into account the cultural specificity of the audiovisual sector. The formation of large European groups must be permitted for the purpose of creating a true European cultural industry in the global market.

This is a case where judicious use of the passive voice can lead to significantly increased readability, and once again we see that translating in plain-language involves making conscious decisions about how best to communicate the meaning of the source text rather than simply plugging sentence A into formula B.
V. Conclusion

Plain language unmistakably is and should be an E.U. priority. Complex and technical writing alienates readers and more often detracts from the text instead of adding to it. However, plain language is not a cure-all, nor is it the substitution of one mindless approach for another. Just as translators must break the habit of translating only surface structures without thought for the content, they should not switch to producing page after page of subject-verb-object clauses and beginning new sentences after every twenty words. As evidenced by the numerous instances above where dogmatic adherence to plain-language recommendations would not necessarily lead to the most appropriate target text, plain language in translation remains primarily a way of thinking about language and communication rather than a one-size-fits-all formula.

Although specific techniques and awareness of common pitfalls are helpful in turning plain language theory into reality, the difference in approach is indeed ideological: the translator must remain conscious of who his target audience is and how best to reach them. Theoretically speaking, Skopos theory is by far the most important consideration, since a text’s target audience and purpose should inform every aspect of the translation. Decisions about jargon and specialized language should be based on the target audience’s level of expertise and the genre’s tolerance for technical parlance; the choice between documentary and instrumental translation should be a function of who will be using the text and how; etc.

Practical Observations

In addition to the examples and case study in this paper, I did a number of plain-language translations that are not featured here. Some were “corrections” of documents with existing translations, while others were done without existing translations for comparison in an effort to create a more true-to-life translation scenario.

During this practice-translation phase, it quickly became apparent that it is much easier to improve on poor translations than to spontaneously produce good ones. Existing translations – even poor ones – can provide “pre-transferred” information (although this is often part of the
problem, since the information has not necessarily been transferred appropriately) and can highlight useful ideas as well as potential pitfalls. In this respect, while comparing and analyzing the case study translation above it was sometimes a challenge to truly re-translate the sample documents rather than merely revise the existing translations. This realization, particularly as I discovered more about the logistical constraints and pressure that are inherent in institutional translation, has made me slower to judge the translators who produced the target texts above without assistance or inspiration from any alternate translations.

I also found that plain-language translation differs hugely from plain-language drafting with regard to the amount of information available to the person producing the text, as well as the amount of supplementary information that can be inserted for the reader’s benefit. A plain-language drafter, by definition, has first-hand information about the topic and therefore has a myriad of options available for increasing clarity and avoiding ambiguity: explain X, provide background information on Y, add a footnote with additional resources about Z, etc. Essentially, the writer has full discretion over what information to present and how to present it. The translator, on the other hand, will rarely have either the background knowledge or the discretionary power necessary to expand on items he finds unclear and is therefore limited (to a greater or lesser extent depending on the specific constraints that apply) to what he can produce or adapt without drawing “fair criticism” from readers or inserting information that is blatantly not in the original.

In short, my view of plain language and its applications for translation has changed significantly since I began this study. I started out with the assumption that applying plain language to translation was as simple as using small words and beginning every sentence with a subject and a verb. As I went along, though, I discovered how much more there is to it: the difficulty of bucking long-standing translation conventions (parallelism and false-cognates-turned-terms-of-art), the utter subjectivity of what does and does not constitute jargon, and the difficulty of clarifying unclear source texts, just to name a few.
Final comments

Despite my newfound sympathy for the trials of plain-language translation, it is clear that the obstacles are not insurmountable. The E.U. has proven itself committed to the plain-language cause and provides no small amount of resources to assist the people responsible for producing its documents. Many of the problems identified in the case study could have been prevented by simply re-reading the target text for content rather than strictly for equivalence with the original, which does not require any significant amount of special plain-language “training” at all.

Even after examining the myriad of issues surrounding plain language in translation, some may still argue that the moral of the plain-translation story is simply “Pay more attention and translate more carefully.” There is no arguing that this is partly the case. However, the general mandate to pay attention can and should be supplemented by specific techniques and by awareness of common stumbling blocks. In addition, however unfortunately, using plain language in translation may still call for justification no matter how formally it has been mandated, and appealing to specific theoretical tenets such as Skopos theory and deverbalization can help make the case for going against the flow. One would hope that such a defense would be less needed in E.U. translation, considering the longstanding campaign against unclear writing, but, as evidenced by the published translations presented here, the fight for clear writing in the E.U. rages on.
Works Cited


Further Reading


Appendix I:

The Elements of Plain Language
by Joe Kimble

Adapted from:

A. In General

1. As the starting point and at every point, design and write the document in a way that best serves the reader. Your main goal is to convey your ideas with the greatest possible clarity.

2. Resist the urge to sound formal. Relax and be natural (but not too informal). Try for the same unaffected tone you would use if you were speaking to the reader in person.

3. Omit unnecessary detail. Boil down the information to what your reader needs to know.

4. Use examples as needed to help explain the text.

5. Whenever possible, test consumer documents on a small group of typical users—and improve the documents as need be.

B. Design

1. Make a table of contents for long documents.

2. Use at least 10- to 12-point type for text, and a readable serif typeface.

3. Try to use between 50 and 70 characters a line.

4. Use ample white space in margins, between sections, and around headings and other special items.

5. Use highlighting techniques such as boldface, italics, and bullet dots. But don't overdo them, and be consistent throughout the document.

6. Avoid using all-capital letters. And avoid overusing initial capitals for common nouns (this agreement, trust, common stock).

7. Use diagrams, tables, and charts as needed to help explain the text.

C. Organization

1. Use short sections, or subdivide longer ones.
2. Put related material together.

3. Order the parts in a logical sequence. Normally, put the more important before the less important, the general before the specific, and the ordinary before the extraordinary.

4. Use informative headings for the main divisions and subdivisions. In consumer documents, try putting the main headings in the form of a question.

5. Minimize cross-references.

6. Minimize definitions. If you have more than a few, put them in a separate schedule or glossary at the end of the document.

(The next four items apply to analytical documents, such as briefs and memos, and to most informational documents.)

7. Try to begin the document and the main divisions with one or two paragraphs that introduce and summarize what follows, including your answer.

8. Use a topic sentence to summarize the main idea of each paragraph or of a series of paragraphs on the same topic.

9. Make sure that each paragraph develops the main idea through a logical sequence of sentences.

10. Use transitions to link your ideas and to introduce new ideas.

**D. Sentences**

1. Prefer short and medium-length sentences. As a guideline, keep the average length to about 20 words.

2. In most sentences, put the subject near the beginning; keep it short and concrete; make it something the reader already knows about; and make it the agent of the action in the verb.

3. Put the central action in strong verbs, not in abstract nouns. ("If the seller delivers the goods late, the buyer may cancel the contract." Not: "Late delivery of the goods may result in cancellation of the contract.")

4. Keep the subject near the verb, and the verb near the object (or complement). Avoid intrusive phrases and clauses.

5. Try to put the main subject and verb toward the beginning; don't pile up conditions or qualifiers before the main clause.

6. Put the strongest point, your most important information, at the end—where the emphasis falls.

7. Prefer the active voice. Use the passive voice if the agent is unknown or unimportant. Or use it if, for continuity, you want to focus attention on the object of the action instead of the agent. ("No more legalese. It has been ridiculed long enough.")
8. Connect modifying words to what they modify. Be especially careful with a series: make clear whether the modifier applies to one or more than one item. (Examples of ambiguity: "educational institutions or corporations"; "a felony or misdemeanor involving dishonesty.")

9. Use parallel structure for parallel ideas. Consider using a list if the items are at all complicated, as when you have multiple conditions, consequences, or rules. And put the list at the end of the sentence.

E. Words

1. Prefer familiar words—usually the shorter ones—that are simple and direct and human.

2. Avoid legal jargon: stuffy old formalisms (Now comes; In witness whereof); here-, there-, and where-words (hereby, therein, wherefore); unnecessary Latin (arguendo, inter alia); and all the rest (and/or, provided that, pursuant to, the instant case).

3. Avoid doublets and triplets (any and all; give, devise, and bequeath).

4. In consumer documents, explain technical terms that you cannot avoid using.

5. Omit unnecessary words.

6. Replace wordy phrases (prior to, with regard to, in the event that).

7. Give shall the boot; use must instead.

8. In consumer documents, consider making the consumer "you."

9. Avoid multiple negatives.

10. Be consistent; use the same term for the same thing, without thinking twice.
Appendix II:

French source text

Co-organisé par la France et la République tchèque, dans le cadre de la Conférence européenne et de la Présidence française de l'Union européenne, avec la participation de la Commission européenne et la contribution d'Eureka Audiovisuel, ce Séminaire a réuni plus de deux cents responsables politiques, institutionnels et professionnels du secteur audiovisuel des 15 Etats membres de l'Union européenne, des 13 Etats candidats à l'adhésion et de la Suisse.

A travers l'examen détaillé de plusieurs expériences positives présentées par des professionnels européens, les débats ont visé à identifier les défis et les opportunités créés par la mise en place d'un marché audiovisuel européen élargi, ainsi qu'à énoncer des propositions concretes susceptible d'accompagner ce processus.

Dans cette perspective, les participants ont souligné l’importance des points suivants :

1/ Ils ont fait valoir la spécificité et l’importance du secteur audiovisuel pour la préservation et la promotion de la diversité et de la richesse des cultures européennes, dans le cadre de la construction d’une Union européenne élargie.

2/ Ils ont insisté dans ce contexte sur l’importance d’un cadre juridique adéquat pour le développement du secteur audiovisuel, au niveau national et européen, en vue de la constitution d’un espace audiovisuel européen cohérent.

Ceux des candidats qui n’ont pas achevé la reprise de l’acquis communautaire en matière audiovisuelle ont réaffirmé leur détermination à le faire le plus rapidement possible.

Pour favoriser la reprise de l’acquis, lorsque celle ci n’est pas achevée, et une plus grande effectivité de sa mise en oeuvre, la nécessité d'une mobilisation du programme PHARE a été soulignée.

3/ Les participants ont relevé que le développement d’un espace audiovisual européen représente un enjeu à la fois politique, culturel et économique, destiné à favoriser les échanges culturels et une meilleure comprehension entre les peuples européens, ainsi qu’à renforcer la compétitivité des acteurs audiovisuels européens à l’ère de la révolution numérique.

L’existence d’un système dual, caractérisé par un système public fort et un secteur privé dynamique, est l’une des clés de voûte de l’Europe de l’audiovisuel. Il doit être conforté par la sécurisation juridique du financement des chaînes publiques. Cela leur permettrait notamment, dans le cadre de leur mission de service public et aux côtés des autres opérateurs de ce secteur, de profiter pleinement des nouvelles possibilités offertes par le développement des technologies de l’information (chaînes thématiques, télévision numérique hertzienne, Internet, services radiophoniques).

Le développement d’instruments nationaux et européens – ces derniers dans le cadre des programmes PHARE et MEDIA, de la Banque européenne de reconstruction et de développement (BERD), de la Banque européenne d’investissement (BEI), et du Fonds européen d’investissement (FEI) – pour favoriser la production, le développement, la distribution et la promotion de programmes culturellement diversifiés constitue également un élément.
détecteur pour atteindre ces objectifs.

Ils ont considéré la participation prochaine des pays candidats au programme MEDIA comme un élément essentiel dans la stratégie de préadhésion, et appelé au développement de mesures d’accompagnement, en particulier dans le cadre du programme PHARE, afin de garantir l’équilibre du programme et son accessibilité à tous les professionnels concernés.

Les participants ont estimé essentiel que, conformément au traité de l’Union européenne, l’application du droit de la concurrence prenne en compte la spécificité culturelle de ce secteur et permette l’émergence de grands groupes européens en vue de la création d’une véritable industrie culturelle européenne dans le contexte d’une concurrence mondiale. Le pluralisme devra être respecté sur chacun des marchés concernés.

Les participants ont réaffirmé la légitimité des aides publiques à la création et à la diffusion des œuvres cinématographiques et audiovisuelles, dans le respect des règles du traité de l’Union européenne. Ils ont demandé à la Commission européenne de clarifier sa réponse sur cette question déterminante pour le renforcement de la diversité culturelle.

Ils ont enfin marqué leur attachement à ce que la capacité à définir et développer des politiques nationales et communautaires pour la sauvegarde et la promotion de la diversité culturelle européenne soit rigoureusement promue dans les instances multilatérales.
Original translation

This seminar, which was organised jointly by France and the Czech Republic in the context of the European Conference and the French Presidency of the European Union with the participation of the European Commission and the contribution of Audiovisual Eureka, brought together more than 200 political, institutional and professional heads from the audio-visual field from the 15 Member States of the European Union, the 13 candidate countries and Switzerland.

Through the detailed examination of several successful experiences presented by European professionals the debate aimed at identifying the challenges and opportunities created by the establishment of an enlarged European audio-visual market, as well as enunciating concrete proposals, able to accompany this process.

Within this framework, the participants underlined the importance of the following points:

1/ They emphasised the specific nature and the prominent role of the audio-visual sector in the preservation and the promotion of the diversity and the richness of European cultures, in the context of the construction of an enlarged Europe Union.

2/ In this context, they insisted up on the importance of an adequate legal framework for the development of the audio-visual sector on both national and European levels in order to create a coherent audio-visual European area.

Those applicant States which have not yet completed the adoption of the Community “acquis” in the audio-visual field reaffirmed their determination to do so as soon as possible.

In order to encourage the adoption of the Community "acquis", where this has not yet been completed, and to enhance the effectiveness of its implementation, the necessity to utilize the PHARE programme was underlined.

3/ The participants raised the question of the further development of an European audiovisual area, which is a major challenge – not only in cultural terms, but also from a political and economic point of view – for the development of cultural exchanges and for a better understanding between the people of Europe, as well as for the reinforcement of the competitiveness of European audio-visual actors in the context of the digital revolution.

The existence of a dual system in which a strong public service and a dynamic private sector coexist is the keystone of audio-visual Europe. It has to be reinforced by legally securing the financing of public channels. The later will enable them, in particular within the remit of public service and alongside with the other actors of the sector, to take full advantage of the new opportunities offered by the development of information technologies (thematic cable and satellite channels, digital terrestrial television, the Internet and radio services).

The development of national and European tools – within the framework of the PHARE and MEDIA programmes, and EBRD, EIB and EIF. In order to stimulate production, development, distribution, promotion of culturally diversified programmes is also a key element to reach these goals.

The forthcoming participation of candidate countries to the MEDIA programme being an essential aspect of the pre-accession process, participants ask for the establishment of accompanying measures, in
particular in the framework of the PHARE programme, in order to guarantee the balance in that programme and its accessibility to all professionals concerned.

The participants considered that it was essential that, in accordance with the European Union Treaty, the implementation of competition law takes into account the cultural specific features of the audio-visual sector and allows the formation of major European groups with a view to creating a real European "cultural industry" in a world-wide competitive audiovisual market. Pluralism should continue to be respected on each of the markets concerned.

The participants reaffirmed the legitimacy of public aid for the creation and broadcasting of cinematographic and audiovisual works, in accordance with the rules of the European Union treaty. They requested the European Commission to clarify its response to this question, which is a deciding factor for the strengthening of cultural diversity.

And finally, the participants strongly affirmed that the capacity to define and develop national and Community policies to safeguard and to promote European cultural diversity should be rigorously promoted within multilateral bodies.
Plain-language translation

France and the Czech Republic, with assistance and participation from the European Commission and Eureka Audiovisual, organized the seminar as part of the European Conference during France’s term as E.U. president, bringing together more than 200 political, institutional, and professional leaders in the audiovisual field from the 15 E.U. member states, 13 applicant countries, and Switzerland.

The debates looked closely at several positive experiences presented by European professionals in order to identify the challenges and opportunities involved in enlarging the European audiovisual market and to make practical suggestions about handling the enlargement.

The participants highlighted three key points:

1) The audiovisual sector is a unique and important part of preserving and promoting European cultural richness and diversity during E.U. enlargement.

2) Audiovisual development must be appropriately supported by national and European legal frameworks in order to create a coherent European audiovisual area.

The applicant countries which had not adopted E.U. laws for the audiovisual field confirmed that they planned to do so as soon as possible.

Participants stressed that the PHARE program should be used to promote the adoption of the E.U. body of law and to make it more effective.

3) that developing a shared European audiovisual area would have a political, cultural, and economic impact by promoting cultural exchanges and better understanding among the people of Europe and increasing E.U. competitiveness in the audiovisual market as the digital revolution continues.

A European audiovisual space must be based on a strong public system combined with an active private sector. This combination should be strengthened by legal protection of financing for public channels so that they can fulfill their public-service mission alongside other operators by taking full advantage of the opportunities created by new information technology (themed channels, digital terrestrial television, the internet, and radio services).

Developing national and European tools (within the PHARE and MEDIA programs, the European Bank for Reconstruction and Development, the European Investment Bank, and the European Investment Fund) is another key to achieving these goals by promoting the production, development, distribution, and promotion of culturally diverse programming.

Participants noted that applicant countries’ forthcoming participation in the MEDIA program is essential for the pre-accession process and called for measures to support them, particularly in the PHARE program, so that the program will be balanced and accessible to all the professionals involved.

The participants felt that the application of laws on competition must, within the framework of the E.U. treaty, take into account the cultural specificity of the audiovisual sector and permit the formation of large European groups, with the goal of creating a true European cultural industry in the global market. Pluralism in the markets involved must be respected.
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